

Exhibit W

Official



Dedication
Ceremony

for Grange Halls

THE NATIONAL GRANGE



*Presented to**

Grange

For Official Dedication of its Hall

(DATE)

Master

State Grange

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* Certain State Granges follow the highly commendable practice of presenting a set of these Dedication Ceremony booklets to Granges upon completion of their Hall.

Official Dedication Ceremony *for Grange Halls*

THIS Dedication Ceremony itself is a part of the prescribed ritual of the Order, authorized by the National Grange.

The ceremony of dedication must be performed by the Master of the State Grange, or by some member of the State Grange especially deputed by him to do so. He shall always be addressed as "Worthy Dedicating Officer."

The hall dedication may be conducted in closed Grange session, under the order of New Business, or may be opened to the public by previous vote of the Grange. In the latter case, the assembly will simply be called to order, previous to the Dedication Ceremony. Public dedication is recommended.

All officers and members will wear regulation regalia, and marching officers will bear their emblems of office. Whether the exercises be in closed session or public, the hall will be set up in regular form, as prescribed in the Manual, except there will be no altar.

Two Past Masters, or other Patrons selected in advance for the positions, will occupy the respective stations of Master and Overseer. When all is in readiness for the exercises, the Acting Master will call to order and the dedication exercises will be carried out as indicated.

ORDER OF SERVICE

ACTING MASTER—Worthy Overseer, [Overseer rises] is our Worthy Dedicating Officer in waiting?

ACTING OVERSEER—Worthy Master, Brother [Give full name and title] is in waiting.

ACTING MASTER—Our Worthy Dedicating Officer, accompanied by the officers of Grange, will be presented.

Following this instruction, Acting Master calls up and march starts from the anteroom, in double file, as follows:—

[MUSIC]

Flag Bearer

Assistant Steward and Lady Assistant Steward

Dedicating Officer and Flora

Master and Ceres

Overseer and Pomona

[The arrangement of the other officers in the line of March may be varied to suit the occasion.]

If State or National Grange officers are present, they will be assigned places in the line, in ranks of two, directly following the Graces.

As the line passes Master's station the second time, Flag Bearer drops out and stands holding the flag. After Flag Bearer drops from line, all the sisters [except Lady Assistant Steward] will drop out as stations are passed. The brothers drop out on third round and the Assistants return to their stations.

Master calls down.

Master remains standing and addresses Dedicating Officer, who rises:

MASTER—Worthy Dedicating Officer, the officers and members of Grange, No.

....., through loyal cooperation and at great expense and labor, have erected [purchased or secured] the hall in which we are now assembled, in order that the Grange may have a permanent home. We, therefore, desire that it be formally dedicated to the purposes for which it is designed, according to the custom and usages of the Order of the Patrons of Husbandry.

DEDICATING OFFICER—Worthy Master and Patrons, [Master sits] the custom of celebrating in some formal manner the completion of public buildings is as old as the art of architecture. The formal dedication of halls and buildings to the purposes for which they are erected is equally venerable. We follow, therefore, long-established precedents in dedicating this beautiful Grange home to the uses of the Order of Patrons of Husbandry.

As that family is more closely bound together by home and household ties, which gathers nightly around its own hearthstone and beneath its own roof-tree, so that society is most firmly established which meets within its own walls. There is magic in the word Home.

I congratulate you upon the wise forethought that has prompted you to provide yourselves with this attractive Grange home. I trust that here, not only you, but all who come after you, may meet in fraternal amity, and that the spirit of discord, contention and ill-will may never cross your threshold.

The organization in whose name and in whose honor we are now assembled was not the creation of a day and is destined to long life and usefulness. By more than eighty years of continuing achievement, it has proven its worth by stimulating educational and social leadership among agricultural people. Founded upon the necessities of husbandry—if we are true to its principles and true to ourselves—it can never pass away so long as agriculture

survives and mankind continues to draw its sustenance from the earth. Like water from a never-failing fountain, it will continue to lighten the labors of the husbandmen, will make fruitful fields more productive, and cause barren wastes to bloom.

Every advance in the world's progress has been made by the combined efforts of men, exerted through organization. In the infancy of the human race, the very necessities of the times compelled men to combine their strength for mutual protection and assistance. The earliest form of such organization was of a family or tribal character. In time, these groups became stronger, more compact and more extensive, until hundreds of millions of people were sometimes embraced within a single governmental organization.

Subordinate to these, similarity of belief, of aspiration and of interest has, in every age and in all countries, induced or compelled the formation of religious, educational or protective associations, as numerous and as varied as the necessities which gave them birth. The history of the world is but the history of organization, and demonstrates alike its necessity and its beneficence.

The Order of the Patrons of Husbandry was first to recognize the right of woman to a participation in the march of progress, and deserves the honor of correctly estimating her talents and of calling to its councils her finer perceptions, her keen intuitions and her unfailing sympathies. Wisely this fraternity admits her to equal participation in its mysteries, its instructions and its benefits.

The Grange door swings inward as readily at the gentle touch of woman as to the bolder knock of man. She is conducted not to a silent and humble seat in its congregation, but is given an equal voice in its councils and shares with her brother its most exalted honors.

Within this Grange home, instruction and entertainment will be happily combined. Here plans for cooperative effort and community betterment will be laid; events of importance and accomplishment will be celebrated; the happenings of a vast world of action will be reviewed and the lessons thereof be emphasized. Here loyal service will be recognized, and here, finally, the members will gather to pay loving tribute to those who have served faithfully down through the years.

This dedication, therefore, takes on far-reaching significance, because within the walls of this Grange home will be taught the noblest ideals of civilization. Here will be given the individual opportunity that trains men and women for larger usefulness and civic service; here new emphasis will be placed upon the home, its influence extended and its ties strengthened; here, also, will be taught loyalty to country and to God and the never-ceasing duty each human being owes to his fellows.

Conscious of the new responsibilities your Grange now assumes, and certain that it will discharge them with fidelity, we gladly participate in this solemn service of dedication.

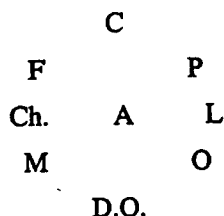
MASTER [Rises]—We will now proceed to establish our altar, asking all to join reverently in recognition of this emblem of our faith in God, our hope for His continual blessing and protection, and our practice of that charity which He has commended as the greatest of all virtues.

[MUSIC]

Assistant Stewards march once around hall, picking up four altar bearers [Past Masters if possible] and pass to anteroom, where altar is in readiness. Assistant Stewards lead back, followed by four altar bearers, one at each corner, and by a young girl dressed in white, carrying open Bible, which is

placed upon altar, when in position, allowing space for offering of Graces. As altar enters door, Master calls up. Bearers pass to front of Overseer, then to proper place, deposit altar, and follow Assistant Stewards in double rank around hall to former seats. Assistant Stewards proceed to stations. "Nearer, My God, to Thee" suggested as music during march.

When Assistants have resumed stations, Flora, followed by Ceres, Pomona, Dedicating Officer and Master, march entirely around the hall, with Lecturer dropping in behind Pomona, Overseer behind Lecturer and Chaplain behind the Master. The altar is circled until all are in proper position as shown in diagram, the Dedicating Officer facing the station of Overseer.



MASTER—In keeping with the reverent spirit of this occasion, we join with you, Worthy Chaplain, in seeking the Great Master's favor.

CHAPLAIN—Let us pray.

O, Thou Great Eternal Builder, we come before Thee with grateful hearts for the devotion of those who in days past have toiled and planned and sacrificed to build this Great Order. We thank Thee for the loyalty, the energy, and the foresight which have inspired these Patrons to build this Grange home, where the idealism of the Founders may be brought into fuller fruition.

We are met to dedicate this Grange hall.
 Bless us in our undertaking. May those
 who meet within these walls remain stead-
 fast to the principles of our fraternity and
 be given strength to carry forward its
 work, wisdom to avoid error, and vision
 to direct its efforts. May all our plans
 seek to advance Thy Kingdom and to
 promote the welfare of our fellow men.

We ask all in Thy Holy Name. Amen.

ALL—Amen.

Chaplain leads in responsive reading:

CHAPLAIN—Praise ye the Lord.

ALL—The Lord's name be praised.

CHAPLAIN—Not unto us, O Lord, not unto us,

ALL—But to Thy name be the praise.

CHAPLAIN—And for Thy loving mercy.

ALL—And for Thy truth's sake.

CHAPLAIN—Thou visiteth the earth and blesseth
 it.

ALL—Thou maketh it very plenteous.

CHAPLAIN—Thou enricheth it with the full river
 of God.

ALL—For so Thou provideth the earth.

CHAPLAIN—Thou watereth her furrows.

ALL—Thou sendeth rain into the little valley.

CHAPLAIN—Thou maketh it soft with the drops
 of rain.

ALL—And blesseth the increase of it.

CHAPLAIN—Thou crowneth the year with Thy
 goodness.

ALL—The clouds drop fatness.

CHAPLAIN—Thy folds shall be full of sheep.

ALL—The valleys shall stand so thick with corn,

CHAPLAIN—That they shall laugh and sing.

ALL—Not unto us, O Lord, not unto us,

CHAPLAIN—But to Thy name be the praise.

ALL—And for Thy loving mercy,

CHAPLAIN—And for Thy truth's sake, Amen.

ALL—Amen.

ALTAR SONG

Acting Master calls down. When quiet is restored, Master says:

MASTER—As our organization has always recognized and welcomed woman as the equal of man, we ask her in turn to strengthen it by her sympathy and to encourage it by the elevating and refining influence of her presence. She represents with us the Faith, the Hope and the Charity of the Order. Our altar would lack its chief consecration if not blessed and endowed by her. We, therefore, ask her to lay thereon her offering and to invoke the blessings of peace and prosperity upon our Order.

Flora advances, lays her offering of flowers upon the altar and says:

FLORA—I lay upon our altar an offering of the flowers of spring, as an emblem of that faith which animates the laborer in springtime to sow the seed, believing that the promised seedtime and harvest will repay his toil and reward his faith. As every seed bringeth forth fruit after its kind, so in every action of life. As we sow, we shall also reap. May each act of every Patron be as good seed sown, so that when at last we are cut down by the reaper, Death, we may, like good wheat, be gathered into the garner-house of God.

POMONA [Deposits fruit]—I lay upon our altar an offering of the fruits of summer, as an emblem of that hope which inspires the cultivator to toil through the summer's heat, trusting that abundant harvests will bless his labor. As he prunes and

trains the vines, to check excessive and worthless growth, so that perfect and abundant fruit may form, likewise each Patron should prune his mind of every unworthy thought and influence, that when the fruits of his life work are presented before the Great Patron Above, they may be found perfect, abundant and acceptable.

CERES [Deposits grain]—I lay upon our altar an offering of the ripened grains of autumn, as an emblem of that charity which should characterize the harvester and crown his labors. As God remembers us by filling our stores with plenty, so should we not forget the destitute and the distressed; ever remembering that He hath declared Himself to be the father of the fatherless and the widow's God. But charity has a more exalted application than merely the bestowal of alms. It teaches us to be tolerant of the opinions of others, to make allowance for their shortcomings and to seek probable reasons for their apparent failures. When evil is suggested and circumstances appear to condemn, "Judge not, that ye be not judged." This is the true spirit of charity. May each Worthy Patron, with liberal hands, so dispense charity as to hear the blessed assurance, "Inasmuch as ye have done it unto one of the least of these, my brethren, ye have done it unto me."

OVERSEER—Out of the memories of the past, let the voice of Grange achievement be heard. Serving well each succeeding generation of rural homes and people, continuing ever true to the ideals of the Founders, the Grange has made substantial contribution to the best things in American life, and constitutes one of the important assets of the nation.

LECTURER—Glorious as Grange history has been, its supreme task lies before it. In the midst of world perplexities and doubts, the calm, well-balanced judgment of this fraternity must assist in meeting great needs and in promoting universal prosperity and human happiness. Blessed with this

new home, of such ample equipment, may
Grange always measure up to its share in the great
opportunity that beckons on.

CHAPLAIN—Though I speak with the tongues
of men and of angels, and have not charity, I am
become as a sounding brass or a tinkling cymbal;
and though I have the gift of prophecy, and under-
stand all mysteries and all knowledge, and though
I have all faith, so that I could remove mountains,
and have not charity, I am nothing; and though I
bestow all my goods to feed the poor and though I
give my body to be burned, and have not charity,
it profiteth me nothing. Charity suffereth long
and is kind, charity envieth not, charity vaunteth
not itself, is not puffed up, does not behave itself
unseemly, seeketh not her own, is not easily pro-
voked, thinketh no evil; rejoiceth not in iniquity,
but rejoiceth in the truth; beareth all things, be-
lieveth all things, hopeth all things, endureth all
things. And now abideth Faith, Hope, Charity,
these three, but the greatest of these is Charity.

Acting Master calls up and Dedicating Officer
says:

DEDICATING OFFICER—By virtue of the au-
thority in me vested, and in the name of the State
Grange of, I hereby dedicate this
Grange home to the use and purposes of the Order
of Patrons of Husbandry. May Faith inspire, Hope
sustain, and Charity characterize all the work and
councils of this Grange.

At close of Dedicating Officer's charge, officers
surrounding the altar join hands and all unite in
singing one verse of "Blest Be the Tie That Binds."

Music as officers retire to stations, Flora leading,
circling the hall once each, dropping out as they
pass their stations.

DEDICATION ODE

Master calls down.

DEDICATING OFFICER—Worthy Master, having formally dedicated this hall to the use and purposes of the Order of Patrons of Husbandry, I now return to you the keys thereof [presents keys], thereby restoring it to the possession of your Grange. I charge you ever to guard its doors against the admission of the disqualified and the unworthy.

MASTER—Worthy Dedicating Officer, in the name of Grange, permit me to thank you for your assistance in the dedication of this hall, and to assure you that you will always be a welcome guest within its doors.

Worthy Steward, [MUSIC.] [Steward advances to Master's station.] to your care is now entrusted the important custody of the keys to this hall [presents keys]. Guard well its doors and be sure they are opened only for the use of the Grange, or by its authority. With the same injunction you will transmit the keys to your successor.

STEWARD—Your instructions, Worthy Master, shall be obeyed.

[MUSIC]

Steward resumes his station.

Master calls up.

MASTER—Worthy Chaplain, we ask you to invoke the continued blessing of our Heavenly Father upon our labors.

CHAPLAIN—May the Great Master of the Universe accept the work of our hands and make it an agency of service, now and forevermore. Amen.

ALL—Amen.

Master closes the exercises with one stroke of the gavel.

Program or entertainment is suggested immediately following the dedication.

Altar Song

Tune: "Come Thou Fount of Every Blessing"

—NETTLETON

1

Here to Thee we raise our Altar,
God of Wisdom, Love and Might,
And we trust in Thee for guidance
That our work be done aright.

2

'Round this altar may each member
Who would be a Patron true,
Pledge to Order, home and nation
Service which will each renew.

3

May the pledges hereon given
Be of faith and hope sincere,
While with work we fill the seasons,
Of life's swiftly passing year.

4

When for us the evening shadows
Tell our day of toil is done,
Cheered by faith may we look forward
To the rising of the sun.

Dedication Ode

Tune: "Juanita"

1

On hill and valley,
 Fertile plain and mountain side,
 We are now building
 That which shall abide;
 May no word or action
 E'er our union true divide;
 But in every section
 May our truths abide.

CHORUS

Grange Home—how we love thee!
 'Round thy hearth may Truth remain,
 Binding us ever
 By true friendship's chain.

2

When summer's sunshine
 Turns to gold the waving grain,
 And autumn's fruitage
 Brings reward again,
 Tho' the cold of winter
 Stills the world in silence deep,
 Springtime's resurrection
 Will her promise keep.

CHORUS

Grange Home—place of plenty!
 May we share thy gladsome cheer,
 Whate'er the season
 Of the circling year.

When the Great Master
 Says to us, "Thy work is done,"
 And shades of evening
 Dim life's setting sun,
 May to each be given
 As a man and matron true,
 The rewards of Heaven
 As our wages due.

CHORUS

Grange Home—of thy blessings
 May we share the gathered store,
 Rich sheaves possessing
 When life's day is o'er.

Suggestions

For Making the Dedication Ceremony Interesting and Impressive

The first step in planning for dedicating a Grange hall is to get in touch with the Master of the State Grange to arrange for date of ceremony, instructions and suggestions.

Everyone having a ritual part in the Dedication Ceremony must be sure it is thoroughly committed to memory and should give it in a dignified and inspiring manner. This ritual ceremony should never be attempted without thorough rehearsal and adequate preparation, including suitable hall decorations and, of course, the provision of real fruits and flowers for Pomona and Flora as well as grain for Ceres. It is particularly important that the entrance march and presentation of the altar be thoroughly rehearsed.

A good chorus should be available to lead in singing the songs indicated, with appropriate music to accompany all marches upon the floor.

Everyone should be supplied with a leaflet containing words of the "Altar Song," "Dedication Ode" and the responsive reading led by the Chaplain, in which all are expected to join. Such leaflets can be purchased in desired quantities and at minimum price, through The National Grange Supply Department, 1616 H St., N.W., Washington, D.C. 20006.

Past Masters of the Grange are the most fitting altar bearers, but if these are unavailable, four other members should be selected and assigned seats at the Master's left, from which they march when going for the altar and to which they return after the altar is placed, following the Assistant Stewards in both instances. All Past Masters should be included in the line of seats reserved at the Master's left.

Sufficient seats should be provided at the Master's right for such guests as are included in the entrance march; these guests drop out of line immediately following the Dedicating Officer, who is seated directly at the Master's right.

The long charge by the Dedicating Officer is given from the Master's station, and the Master sits after acknowledging the opening salutation of the Dedicating Officer.

Enough copies of this Dedication Ceremony should be provided to furnish one to each officer participating; and far enough in advance to permit thorough study.

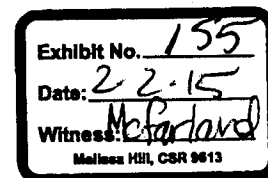
Start the exercises promptly at the advertised hour and conduct them in a dignified manner, without unnecessary delays.

The formal Dedication Ceremony may be followed by a speaking or literary program, but with ample opportunity for all to inspect the new hall and its equipment. The fact should be strictly borne in mind that the Dedication Ceremony itself is a part of the prescribed ritualism of the Order, authorized by the National Grange.

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Exhibit X

INSTALLATION OF OFFICERS



[Any Master, Past Master or Fifth Degree member may install officers. The installation may be public if desired.]

M. We have met on this occasion to install the officers of this Grange; let us first invoke the blessing of God. *[Calls up.]*

C. Almighty Father, Maker and Ruler of the Universe, and Giver of every good and perfect gift, we beseech Thee to be with us on this occasion. Bless those who shall now be installed officers of the Grange, and endow them with prudence and wisdom. Be with all the officers of the National and State Granges, and aid all connected with our Order in extending its benefits in all parts of our land. Prosper all orders and associations having for their object the advancement of education, and of the moral welfare and happiness of mankind. We ask all in Thy holy name.

All. Amen.

(Opening Ode, No. 13, The Grange Songbook.)

M. *[Calls down.]*

M. The officer-elect will please seat themselves at the left of the Worthy Master.

[When seated he shall say:]

M. Patrons and Friends, be pleased to give an attentive ear to our worthy Brother (Sister) who has been authorized to install our officers.

[Installing officer may open with an original address, but should close with the following:]

Since God placed man on the earth, agriculture has existed. There is no occupation that precedes it, no order or association that can rank with the tillers of the soil. Before literature existed, before governments were known, agriculture was the calling of man. And all the fruits of social progress since then grew from the brown soil. Agricultural toilers, therefore, "claim this precedence over royal dynasties and titles of nobility-that they represent the oldest and most indisputable lineage, and hold a patent that issues from the ancient gates of Eden. The Order of Patrons of Husbandry is the only association whose teachings accompany its members in their daily pursuits. They form part of the farmer's life. They do not call him from his work to put his mind upon any other subject, but furnish recreation in his daily duties, and, by cheerful instruction, lighten and elevate his labor. These teachings are the loftiest that man can seek. Nor does our Order interfere with his religious or political views, but in morality it seeks the highest standard. Honesty is inculcated, education nurtured, temperance supported, brotherly love cultivated, and charity made an essential characteristic. Thus our Order binds us together in fraternity, and, by encouraging education, will advance to a higher state of perfection the science of agriculture. We encourage the planting of trees, fruits and flowers, by which to enhance the value and increase the attractions of our home; adorning them with those beauties so lavishly given us by the God of Nature. There is no calling more elevating to the mind than agriculture, when viewed as presented in our Order. God, in the beginning, made it honorable, and it is our duty to sustain it as such.

Discarding the principles which exclude women from knowledge of the mysteries, we open wide the door and bid her welcome. In so doing we claim a high precedent, for God said, "It is not good for man

to be alone." Thus ours is truly a social Order -- one in which all can find something to enjoy; and we believe there is nothing better for a man than that he should eat and drink, and that he should make his soul enjoy good in his labor. It is from the hand of God.

We ask none to join us who cannot see good in their fellow beings; but to all interested in Agriculture, who have generous hearts and open hands to help the needy, raise the fallen, and aid in making the labors of this life cheerful, we say, "Welcome to the Grange."

[To the members]

Patrons, I am clothed with authority to install your officers.

[To officers-elect]

Placing confidence in you, that you will seek to add honor to your positions by correct deportment, your companions have selected you as their leaders for the ensuing year.

[To the Grange]

Patrons, it your wish that Brother (Sister) _____ shall be installed as Master of this Grange?

All It is.

[Installing Officer's Marshall will now conduct the Master-elect to the altar and say:]

Mar. Worthy Sir, I have the honor to introduce to you Brother (Sister) _____, who has been chosen Master of this Grange. I believe him (her) to be well skilled in our work, and observant of the noble precepts of our Order, and I have no doubt that he (she) will discharge the important duties of his (her) office with fidelity.

Master

[Installing Officer calls up and administers this Obligation:]

I, _____, having been elected Master of _____ Grange, do solemnly pledge my honor that I will perform all the duties appertaining to the office, as far as in my power, until my successor is duly installed. I will support the Constitution and By-Laws of the National Grange, and of this State Grange, and the By-Laws of this Grange, and I will inculcate a strict obedience to all laws and edicts emanating from the proper authority. I will not take advantage of the position to bias, in any way, either directly or indirectly, the political or religious opinions of any member of the Order. And at the close of my term of office, or when legally required, I will deliver to my successor, or other property authorized person, all the property of the Grange, or of the Order, which may be in my possession. All of which I promise on my sacred honor.

[Installing Officer calls down.]

I.O. Worthy Brother (Sister), in performing this duty, I must impress upon your mind the importance of the position you hold. You should be foremost in advocating the principles and carrying out the objects of our Order, To you all connected with your Grange will look for example; and not these only, but those outside the Gate will diligently scrutinize each act. Let me caution you, that you keep the eye of the mind

open among your members. Encourage improvement; remember that Nature's motto is onward; SHE never goes backward.

You may encounter difficulties. Overcome then, remembering that difficulties' are but opportunities to test our abilities. As Master of this Grange, your fellow laborers will look to you to devise work. A judicious Master will use due care that no time is lost in useless labor. Let all labor and all time tend toward improvement. Your laborers may not at first comprehend the value of this; but it is your duty to instruct them. Thus you will come in contact with their minds; if they are left uncultivated, if neglect is allowed, the moral weed crop will baffle and torment you.

It is especially your duty to exercise the supreme authority with you are invested, in maintaining order in the Grange, and in enforcing obedience to the Constitution and Laws of the Order, yourself setting the example in all things. Decide all questions with calmness and firmness, granting the right of appeal courteously, and abiding decisions against you cheerfully.

We trust that it will be a prominent part of your duty, both in and out of the Grange, to encourage the education of the children within the limits of your jurisdiction, and to plead that they be not employed in the arduous labors of the field, before their minds have received that gentle care and training which enliven, explain, and dignify labor.

It is also an important part of your duty to exercise such oversight in the conduct of the Grange as will encourage each officer to perform his or her part, and to suggest ways and means of assistance whenever needed.

[Installing Officer calls up and continues:]

I now decorate you with the regalia of the Master of this Grange, and present you with the Master's gavel; *[presents gavel]* and *[conducting him to the Chair]* I place in your hands the Constitution and By-Laws of the National Grange and of our State Grange, and the By-Laws of this Grange. *[Presents books.]*

[Installing Officer calls down. Retiring Master extends greetings, and, if he sees fit, makes a retiring speech.]

[Installing Officer returns to Altar, and calls up]

I.O. Officers elect, I am about to administer to you the oath of office. Please place your right hand over your heart. At the conclusion of this oath, you will be asked to accept this oath.

OATH

Having been elected an officer of my Grange, I do solemnly pledge my honor that I will perform all the duties appertaining to the office, as far as in my power, until my successor is duly installed. I will support the Constitution and By-Laws of the National Grange, and of this State Grange, and the By-Laws of this Grange, and I will inculcate a strict obedience to all laws and edicts emanating from the proper authority. I will not take advantage of the position to bias, in any way, either directly or indirectly, the political or religious opinions of any member of the Order. And at the close of my term of office, or when legally

required, I will deliver to my successor, or other property authorized person, all the property of the Grange, or of the Order, which may be in my possession. All of which I promise on my sacred honor.

Patrons, is this your oath?

ALL Yes

[Calls down]

I.O. Worthy Marshall, please present the Overseer's elect.

[Marshall introduces -- Overseer]

OVERSEER

I.O. Brother (Sister), it is your duty to see that the orders of the Master are faithfully transmitted to the Laborers, and, in his (her) absence, to take his (her) place. The Laborers come to you for instruction in their work, and you are brought in contact with them. Your influence is direct; exert that influence with due care. Of all the sweeteners of human toil, of all the motive powers that give alacrity to the hand or foot, readiness to the will, and intelligence to mind and purpose, the quickest and most enduring in results is the kind word spoken in season.

In presenting you with the emblem of your rank *[presents gavel]*, I urge you to be faithful in the performance of your duties.

[Marshall places regalia upon him, and conducts him to his station. Then introduces -- Lecturer]

LECTURER

I.O. Brother (Sister), to you is assigned the important duty of leading in the literary program and the educational work of the Grange. To this end you will be prepared, at all regular meetings, as time will permit, with a list of exercises, consisting of essays, discussions, readings and music, to be responded to by the members. Especially urge and encourage the young and the diffident to become writers, readers and speakers in Grange meetings, and thus develop and direct to greater usefulness the latent abilities of your fellow members.

In selecting subjects, include the household and the home, as well as the farm and the field; for it is in the former that the rewards of labor upon the latter are finally enjoyed. A well-ordered household is essential to a happy home, and without a happy home no farm is fully a success.

You will also see that addresses, lectures, and other information for the good of the Order are promptly laid before the Grange, or distributed among the members.

We now have the pleasure of investing you with the regalia, and of decorating you with the emblem of your office *[presents scroll]*.

[Marshall conducts him to his station. Then introduces - Steward]

STEWARD

I.O. "It is required in Stewards that they be found faithful." Your post is at the Inner Gate, which you are to guard carefully, and to report all signals to the Overseer. Your duty in the Grange is to learn the qualifications of new laborers, then assign them their proper places, and set them at work. It requires good judgment on your part. You are also to see that each one is suitably rewarded for his labor. You will find many claiming a thorough knowledge of the business of the farm who, at the same time, are ignorant of the first principles of the laws of Nature. To these you will furnish every facility, by referring them to the library, to improve their minds, and incite them to use every effort to attain the highest rank in their calling. It is also your duty to keep safely and in proper order the property of the Grange. Your assistants will aid you in the care of the wardrobe, and in arranging the decorations and ornaments of the Grange rooms.

Your emblem is the Spud, *[presents staff]* an ancient implement used by Stewards in passing through the fields to eradicate weeds that may have escaped the notice of the Laborers. Let it remind you of your duty as a faithful steward to prevent or remove all causes of dissension or strife, in the Grange and in our Order.

[Marshall places regalia upon him and conducts him to his station. Then introduces - Assistant Steward]

ASSISTANT STEWARD

I.O. Brother (Sister), your duty is to assist the Steward in his (her) labors, and to examine the members at the opening of the Grange. You will guide those consigned to your charge over the fields, and guard their minds and hearts from misconceptions, and their feet from stumbling. Be cautious, be true. As the Assistant Steward, there are labors also devolving upon you which require that you look carefully to the comfort, protection and welfare of the Grange. Your associations with the Steward should be of the most amicable nature.

Your emblem is the Pruning Hook *[presents staff]*. The spear, beaten into a pruning hook, is emblematic of peace. May it always remind you of your duty to preserve peace in our Order.

[Marshall places regalia upon him and conducts him to his station. Then introduces - Lady Assistant Steward].

LADY ASSISTANT STEWARD

I.O. My Worthy Sister, it is your duty to assist at the opening examination and to conduct your Sister initiates. At your hands alone are they enabled for the first time to enter a working Grange, and it is by you that they are decorated as Sisters in our Order. May the impressions you make upon their minds be salutary, and may the associations so formed prove honorable to all. You will also aid the Steward in keeping the wardrobe and the decorations of the Grange rooms in proper order.

I present you, *[presents shepherd's crook]* the Lady Assistant Steward of your Grange, with the Shepherd's Crook, which symbolizes a sense of caring.

[Marshall places regalia upon her and conducts her to her station. Then introduces - Chaplain]

CHAPLAIN

I.O. *[Calls up and places regalia upon him.]*

Brother (Sister), upon you devolves a labor that I trust will ever be a pleasant and cheerful task. In presenting you with this sacred volume *[presents small open Bible]*, the textbook to which all look for wisdom and instruction, I need not urge you to be faithful in your calling. As the Chaplain of this Grange, in your prayers to the Master of the Great Grange above, may you never labor in vain. May the spiritual seed you shall sow fall on good soil, and bring forth an hundredfold. Cast thy bread upon the waters, and thou shalt gather it after many days. Remember the parable of the mustard seed.

(Song: Nearer My God to Thee, No. 62, The Patron; No. 91, The Grange Songbook.) Brethren, behold your Chaplain.

[Installing Officer or Marshal conducts Chaplain to his station and Installing Officer calls down. Marshall introduces - Treasurer].

TREASURER

I.O. Brother (Sister), confidence in your honesty and integrity prompts your companions to deposit in your keeping the keys of the treasury. Prove your ability by having your accounts always correct and in order for examination, and the funds safely secured and ready for needed payments. Take the emblem of your office *[presents keys]*, and may you prove to all that you are honorable and worthy of the trust.

[Marshall places regalia upon him and conducts him to his station. Then introduces - Secretary]

SECRETARY

I.O. Brother (Sister), the duties of your office are most arduous of all, requiring judgment, promptness and efficiency. You become the organ of the Grange, and through you communication is maintained with the Granges throughout the land. Let your correspondence at all times be courteous, brief, yet comprehensive. The records of this Grange *[presents record book]* will be held as a memento of your labors long after the recording hand has crumbled into dust. Let them be exact, that they may redound to your honor, and exhibit a faithful history of the work of your Grange to all who come after us.

[Marshall places regalia upon him and conducts him to his station. Then introduces - Gatekeeper]

GATEKEEPER

I.O. Brother (Sister), in presenting you with the emblem of your rank *[presents owl on staff]*, I caution you to be vigilant and watchful. Your position between the Outer and Inner Gates is a responsible one. Neglect on your part might permit an enemy to enter, rob the orchard and vineyard, or sow the ground with tares. Being chosen by your fellow Patrons is evidence that they hold you in high esteem. Deserve it, by sleepless watchfulness at your post, by scrutinizing all who enter or pass out, and be seeing that the garments of the Laborers are suitable, and that none enter the field except authorized persons, clad in

proper attire.

[Marshall places regalia upon him and conducts him to his station. Then introduces - Ceres]

CERES

I.O. My Worthy Sister, the ancients worshipped Ceres, Pomona and Flora, as goddesses presiding over cereals, fruits and flowers. But we place woman in these presiding positions as Patrons, to show our respect for her and our regard for Agriculture. Therefore, also, we aid her to enlarge her sphere of thought and action, and to elevate her aims and character; and we ask her in return to grace our meetings with her presence and counsel, and thus refine our manners and improve our lives.

You have been chosen to preside over our sacred rites as Ceres, and to encourage your Brothers to labor with diligence and prudence. We therefore entrust to your care the garnered grain and place the sickle under your protection. *[Presents grain and sickle.]* Treasure the one, guard the brightness of the other. Both are reminders of God's bounty, and of man's duty to garner that bounty, carefully and gratefully.

[Marshall places regalia upon her and conducts her to her station. Then introduces - Pomona]

POMONA

I.O. In greeting you as Pomona, goddess of fruits, let me remind you that the department of fruits is to receive your special attention and care. Urge their cultivation and improvement upon your associates, and encourage woman to engage in that work whenever practicable and proper. The best in kind and quality can never become too abundant.

And thus placing fruits in your care *[presents specimens]*, let us remember that no trees bear fruit in Autumn which do not blossom in the Spring. That life may be profitable, laden with good fruits, let all endeavor that youth be studious and virtuous, replete with the blossoms of observation and study-the promise of future wisdom and usefulness.

[Marshall places regalia upon her and conducts her to her station. Then introduces - Flora]

FLORA

I.O. Selected to impersonate Flora in our sacred rites, I cordially welcome you to that station in you Grange, and trust that the ardor you will evince in the cultivation of those most beautiful expressions of the Creator's goodness will prompt all your associates to adorn their homes with flowers. Their purifying and refining influences are needed by all, and their cultivation cannot but elevate the thoughts and refine the tastes of all who thus study and cultivate their graceful forms and beautiful colors. The home that is thus made fragrant and cheerful is pre pared to be the abode of sweeter affections and more radiant virtues. That you may be incited to a zealous performance of your duties, I present you with these beautiful flowers *[presents bouquet]*, emblematic of the graces and the virtues that should ever adorn and dignify your sex.

[Marshall places regalia upon her and conducts her to her station. Then introduces - Executive Committee]

EXECUTIVE COMMITTEE

- I.O. In installing you as a member of the Executive Committee of your Grange for the constitutional term, we would remind you and your associates *[Installing Officer turns and addresses other members of Executive Committee at their station, who should rise and remain standing until the newly installed member reaches the station]* that the office carries important duties and grave responsibilities. As an Executive Committee you are responsible for the custody of the invested funds of the Grange *[presents bank book]* and from you is expected such advice and counsel as will encourage your fellow officers in the faithful discharge of their duties. As an Executive Committee, but always and only in conjunction with the Worthy Master, you are authorized, between regular meetings of your Grange, in time of emergency or need, to act for and in the name of the Grange itself.

[Marshall places regalia upon him and conducts him to his station. Then introduces - Musician]

MUSICIAN

- I.O. In your selection as Musician of this Grange, you are presented with the opportunity to share your talents with the members of your Grange and visitors and guests.

It will be your duty to select appropriate marches to enhance the floor work of the officers and aid the Lecturer in presenting musical portions of the programs. *[Present music book]*

Music truly touches the mood of people, increasing joy and happiness in good times and providing solace in times of trouble and despair. It is said that God hears music above all else. Use your abilities to lift the hearts of those around you.

[Marshall places regalia upon him and conducts him to his station.]

I.O. *[Calls up].*

I now declare the officers of this Grange duly installed. May your labors be pleasant, and your duties faithfully performed, to the satisfaction of all working under you. Be cheerful, be united. "Behold how good and how pleasant it is for brethren to dwell together in unity. It is like the precious ointment upon the head, that ran down upon the beard--even Aaron's beard--that went down to the skirts of his garments; as the dew of Hermon, as the dew that descended upon the mountains of Zion; for there the Lord commanded the blessing, even life forevermore."

(Song: To Thee Beloved Grange, No. 7, The Patron; No. 22, The Grange Songbook or Closing Ode, No. 27, The Grange Songbook.)

- I.O. And now, Patrons, cherishing in our hearts every kind feeling toward all other orders and associations which seek to promote human welfare, let us strive with them, working hand in hand, for the good of our fellow beings. Let us remember that amid all that is bright and beautiful in Nature there is nothing that blooms with such unfading colors, there is no perfume on earth fraught with such fragrance, as the

flowers of good works, and the sweet-smelling savor of that pity which feels for the wants and relieves the distresses of our Sisters and our Brothers.

[Remarks by newly installed Master and announcement may be made here if they were not made after the Master was escorted to his station].

BENEDICTION

Chap. May our Father and our God, the bounteous Benefactor of all beings, Who has filled the earth with His goodness and crowned its seasons with continually renewed beauty, fill our souls with His love, that our every good word and work may be blessed with abundant harvests of joy and peace.

All.Amen, and Amen!

[Master closes installation with one rap of gavel]

Exhibit Y

Grange adjourn without selecting the place of meeting, the Executive Committee shall appoint the place and notify the Secretary of the National Grange and the Masters of State Granges, at least thirty days before the day appointed.

CONSTITUTION.

ARTICLE III.—*Laws.*

The National Grange, at its annual session, shall frame, amend, or repeal such laws as the good of the Order may require. All laws of State and Subordinate Granges must conform to this Constitution and the laws adopted by the National Grange.

ARTICLE IV.—*Ritual.*

The Ritual adopted by the National Grange shall be used in all Subordinate Granges, and any desired alteration in the same must be submitted to, and receive the sanction of, the National Grange.

ARTICLE V.—*Membership.*

Any person interested in agricultural pursuits, of the age of sixteen years, (female,) and eighteen years, (male,) duly proposed, elected, and complying with the rules and regulations of the Order, is entitled to membership and the benefit of the degrees taken. Every application must be accompanied by the fee of membership. If rejected, the money will be refunded. Applications must be certified by members, and balloted for at a subsequent meeting. It shall require three negative votes to reject an applicant.

ARTICLE VI.—*Fees for Membership.*

The minimum fee for membership in a Subordinate Grange shall be, for men five dollars, and for women two dollars, for the four degrees, except charter members, who shall pay—men, three dollars, and women fifty cents.

ARTICLE VII.—*Dues.*

SECTION 1. The minimum of regular monthly dues shall be ten cents from each member, and each Grange may otherwise regulate its own dues.

ARTICLE I.—*Officers.*

SECTION 1. The officers of a Grange, either National, State, or Subordinate, consist of and rank as follows: Master, Overseer, Lecturer, Steward, Assistant Steward, Chaplain, Treasurer, Secretary, Gate-keeper, Ceres, Pomona, Flora, and Lady Assistant Steward. It is their duty to see that the laws of the Order are carried out.

SEC. 2. *How Chosen.*—In the Subordinate Granges they shall be chosen annually; in the State Granges once in two years; and in the National Grange once in three years. All elections to be by ballot.

Vacancies by death or resignation to be filled at a special election at the next regular meeting thereof—officers so chosen to serve until the annual meeting.

SEC. 3. The Master of the National Grange may appoint members of the Order as deputies to organize Granges where no State Grange exists.

SEC. 4. There shall be an Executive Committee of the National Grange, consisting of three members, whose terms of office shall be three years, one of whom shall be elected each year.

SEC. 5. The officers of the respective Granges shall be addressed as "WORTHY."

ARTICLE II.—*Meetings.*

SECTION 1. *Subordinate Granges* shall meet once each month, and may hold intermediate meetings as may be deemed necessary for the good of the Order. All business meetings are confined to the Fourth Degree.

SEC. 2. *State Granges* shall meet annually at such time and place as the Grange shall from year to year determine.

SEC. 3. The *National Grange* shall meet annually on the first Wednesday in February, at such place as the Grange may from year to year determine. Should the National

SEC. 2. The Secretary of each Subordinate Grange shall report quarterly to the Secretary of the State Grange the names of all persons initiated or passed to higher degrees.

SEC. 3. The Treasurer of each subordinate Grange shall report quarterly, and pay to the Treasurer of his State Grange the sum of one dollar for each man and fifty cents for each woman initiated during that quarter; also, a quarterly due of six cents for each member.

SEC. 4. The Secretary of each State Grange shall report quarterly to the Secretary of the National Grange the membership in his State, and the degrees conferred during the quarter.

SEC. 5. The Treasurer of each State Grange shall deposit to the credit of the National Grange of Patrons of Husbandry with some Banking or Trust company in New York, (to be selected by the Executive Committee,) in quarterly instalments, the annual due of ten cents for each member in his State, and forward the receipts for the same to the Treasurer of the National Grange.

SEC. 6. All moneys deposited with said company shall be paid out only upon the drafts of the Treasurer, signed by the Master, and countersigned by the Secretary.

SEC. 7. No State Grange shall be entitled to representation in the National Grange whose dues are unpaid for more than one quarter.

ARTICLE VIII.—*Requirements.*

SECTION 1. Reports from Subordinate Granges relative to crops, implements, stock, or any other matters called for by the National Grange, must be certified to by the Master and Secretary, and under seal of the Grange giving the same.

SEC. 2. All printed matter on whatever subject, and all information issued by the National or State to Subordinate Granges, shall be made known to the members without unnecessary delay.

SEC. 3. If any brothers or sisters of the Order are sick it shall be the duty of the Patrons to visit them, and see that they are well provided with all things needful.

SEC. 4. Any member found guilty of wanton cruelty to animals shall be expelled from the Order.

SEC. 5. The officers of Subordinate Granges shall be on the alert in devising means by which the interests of the whole Order may be advanced; but no plan of work shall be adopted by State or Subordinate Granges without first submitting it to, and receiving the sanction of, the National Grange.

ARTICLE IX.—*Charters and Dispensations.*

SECTION 1. All charters and dispensations issue directly from the National Grange.

SEC. 2. Nine men and four women having received the four Subordinate Degrees, may receive a dispensation to organize a Subordinate Grange.

SEC. 3. Applications for dispensations shall be made to the Secretary of the National Grange, and be signed by the persons applying for the same, and be accompanied by a fee of fifteen dollars.

SEC. 4. Charter members are those persons *only* whose names are upon the application, and whose fees were paid at the time of organization. Their number shall not be less than nine men and four women, nor more than twenty men and ten women.

SEC. 5. Fifteen Subordinate Granges working in a State can apply for authority to organize a State Grange.

SEC. 6. When State Granges are organized, dispensations will be replaced by charters, issued without further fee.

SEC. 7. All charters must pass through the State Granges for record, and receive the seal and official signatures of the same.

SEC. 8. No Grange shall confer more than one degree (either *First, Second, Third, or Fourth*) at the same meeting.

SEC. 9. After a State Grange is organized, all applications for charters must pass through the same and be approved by the Master and Secretary.

ARTICLE X.—*Duties of Officers.*

The duties of the officers of the National, State, and Subordinate Granges shall be prescribed by the laws of the same.

ARTICLE XI.—*Treasurers.*

SECTION 1. The Treasurers of the National, State, and Subordinate Granges shall give bonds, to be approved by the officers of their respective Granges.

SEC. 2. In all Granges bills must be approved by the Master, and countersigned by the Secretary, before the Treasurer can pay the same.

ARTICLE XII.—*Restrictions.*

Religious or political questions will not be tolerated as subjects of discussion in the work of the Order, and no political or religious tests for membership shall be applied.

ARTICLE XIII.—*Amendments.*

This Constitution can be altered or amended by a two-thirds vote of the National Grange at any annual meeting, and when such alteration or amendment shall have been ratified by three-fourths of the State Granges, and the same reported to the Secretary of the National Grange, it shall be of full force.

THIRD DAY.

FRIDAY, January 10, 1873.

Previous to the opening of the session, Bro. T. R. ALLEN, of Missouri, placed on the table a large vase of various Missouri productions, from his farm, comprising corn, wheat, buckwheat, potatoes, and apples, all excellent specimens.

Worthy Chaplain GROSH called the meeting to order, (the Worthy Master being absent.) and opened with prayer. Minutes of previous sessions were read, corrected, and approved.

Bro. CURTISS offered a resolution relating to Deputies at large. Referred to Finance Committee.

Also, a resolution for a committee of four to report in regard to markets. Referred to Committee on Good of the Order.

On motion, the following resolutions were adopted:

Resolved. That Bros. Thompson of Minn., Robertson, Wilson, Grosh, and Thompson of D. C., and the Master and Secretary of the National Grange, be appointed a Committee on Ritual, whose duty it shall be to report a revised and printed form of the Manual of the Order to the next meeting of the National Grange.

Resolved. That the Committee on the Revision of the Manual be requested to gather material, as their own minds suggest, and meet one week before the meeting of the National Grange, at such place as may be selected by this session as the next place of meeting of the National Grange.

Bro. McDOWELL offered the following, which was seconded by Bro. Aiken, and unanimously adopted:

Resolved, That the thanks of the National Grange be presented to Brother and Mrs. Thomas B. Bryan, for their hospitable entertainment of its members on Thursday evening, the 9th instant, and that our worthy Secretary be, and he is hereby, instructed to communicate the foregoing to Brother Bryan.

The Committee on Transportation and Co-operation made a report referring the whole subject to the Executive Committee. On motion, the report was accepted and so referred.

The Committee on By-laws made a report, which was accepted, when the Grange went into a Committee of the Whole to consider it section by section; Bro. Thompson, of Minnesota, in the chair.

When the Committee rose, the following resolution was adopted:

Resolved, That the report of the Committee on By-laws, as amended in Committee of the Whole, be recommitted to the Committee on By-laws, with instructions that the same be printed.

B Y - L A W S.

ARTICLE 1.

The fourth day of December, the birthday of the Patron^s of Husbandry, shall be celebrated as the anniversary of the Order.

ARTICLE 2.

Not less than the representation of ten States present at any meeting of the National Grange shall constitute a quorum for the transaction of business.

ARTICLE 3.

At the annual meeting of each State Grange it may elect a proxy to represent the State Grange in the National

Grange in case of the inability of the Master to attend, but such proxy shall not thereby be entitled to the Sixth Degree.

ARTICLE 4.

Questions of administration and jurisprudence arising in and between State Granges, and appeals from the action and decision thereof, shall be referred to the Master and Executive Committee of the National Grange, whose decision shall be respected and obeyed until overruled by action of the National Grange.

ARTICLE 5.

It shall be the duty of the Master to preside at meetings of the National Grange; to see that all officers and members of committees properly perform their respective duties; to see that the Constitution, By-laws, and resolutions of the National Grange and the usages of the Order are observed and obeyed; to sign all drafts drawn upon the treasury, and generally to perform all duties pertaining to such office.

ARTICLE 6.

It shall be the duty of the Secretary to keep a record of all proceedings of the National Grange, to keep a just and true account of the National Grange, to keep out by him, to countersign all moneys received and paid out by him, to correspond all drafts upon the treasury, to conduct the correspondence of the National Grange, and generally to act as the administrative officer of the National Grange, under the direction of the Master and the Executive Committee.

It shall be his duty, at least once each month, to deposit with the Fiscal Agency holding the funds of the National Grange all moneys that may have come into his hands, and forward a duplicate receipt therefor to the Treasurer, and to make a full report of all transactions to the National Grange at each annual session.

It shall be his further duty to procure a monthly report from the Fiscal Agency with whom the funds of the National Grange are deposited of all moneys received and paid out by them during each month, and send a copy of such report to the Executive Committee and the Master of the National Grange.

ARTICLE 7.

SECTION 1. It shall be the duty of the Treasurer to issue all drafts upon the Fiscal Agency of the Order, said drafts having been previously signed by the Master and countersigned by the Secretary of the National Grange.

SEC. 2. He shall report monthly to the Master of the National Grange, through the office of the Secretary, a statement of all receipts of deposits made by him and of all drafts or checks signed by him during the previous month.

SEC. 3. He shall report to the National Grange at each annual session a statement of all receipts of deposits made by him and of all drafts or checks signed by him since his last annual report.

ARTICLE 8.

It shall be the duty of the Lecturer to visit, for the good of the Order, such portions of the United States as shall Executive Committee may direct, for which services he shall receive compensation.

ARTICLE 9.

It shall be the duty of the Executive Committee to exercise a general supervision of the affairs of the Order during the recess of the National Grange; to instruct the Secretary in regard to printing and disbursements and to place in his hands a contingent fund; to decide all questions and appeals referred to them by the officers and members of State Granges; and to lay before the National Grange at each session a report of all such questions and appeals, and their decisions thereon.

ARTICLE 10.

SECTION 1. Such compensation for time and service shall be given the Master, Lecturer, Secretary, Treasurer, and Executive Committee, as the National Grange may, from time to time, determine.

SEC. 2. Whenever General Deputies are appointed by the Master of the National Grange, said Deputies may receive such compensations for time and services as may be determined by the Executive Committee: *Provided*, In

case shall pay from the National Grange be given General Deputies in any State after the formation of its State Grange.

ARTICLE 11.

SECTION 1. The financial existence of Subordinate Granges shall date from the first day of January, first day of April, first day of July, and first day of October subsequent to the day of their organization, from which date their first quarter shall commence.

SEC. 2. State Granges shall date their financial existence three months after the first day of January, first of April, first of July, and first of October immediately following their organization.

ARTICLE 12.

Each State Grange shall be entitled to send one representative, who shall be a Master thereof, or his proxy, to all meetings of the National Grange. He shall receive mileage at the rate of five cents per mile both ways, computed by the nearest practicable route, to be paid as follows: The Master and Secretary of the National Grange shall give such representative an order for the amount on the Treasurer of the State Grange which he represents, and this order shall be receivable by the National Grange in payment of State dues.

ARTICLE 13.

Special meetings of the National Grange shall be called by the Master upon the application of the Masters of ten State Granges, one month's notice of such meeting being given to all members of the National Grange. No alterations or amendments to the By-laws or Ritual shall be made at any special meeting.

ARTICLE 14.

These By-laws may be altered or amended at any annual meeting of the National Grange by a two-thirds vote of the members present.

Exhibit Z

Constitution and Digest of the Laws and Enactments of the Order of Patrons of Husbandry

Including the Decisions of the Masters, Executive Committees, and Court of Appeals of the National Grange, from the organization of the Order to November 23, 1944

Issued by the Authority of the National Grange
Corrected and brought down to date
December 6, 1944

First Printing

1945

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CHAPTER IV.

CONSTITUTION

OF THE

NATIONAL GRANGE PATRONS
OF HUSBANDRY.

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ARTICLE I—ORGANIZATION.

SEC. 1. The Order of Patrons of Husbandry shall consist of the following divisions:

Subordinate Granges (membership Granges) having charge of the first four degrees as follows:

First Degree—Laborer (man), Maid (woman).

Second Degree—Cultivator (man), Shepherdess (woman).

Third Degree — Harvester (man), Gleaner (woman).

Fourth Degree—Husbandman (man), Matron, (woman).

Pomona Granges (district membership Granges) having charge of the fifth degree (Pomona).

State Granges (state delegate bodies) having charge of the sixth degree (Flora).

National Grange (a national representative body) having charge of the business of the Seventh Degree (Ceres).

Assembly of Demeter having charge of the secret work of the Order and trial court of National Grange officers.

ARTICLE II—MEMBERSHIP.

SEC. 1. Subordinate Granges.

Any person engaged in agricultural pursuits and having no interest in conflict with our purposes, of the age of fourteen years, duly proposed, elected and complying with the rules and regulations of the Order, is entitled to membership and the benefit of the degrees taken. Every application must be accompanied by the fee of membership. If rejected, the money will be refunded, and no petition shall be received from a rejected applicant until six months shall have elapsed after such rejection. Applications must be certified by two members, and balloted for at a regular subsequent meeting. It shall require three negative votes to reject an applicant.

SEC. 2. Pomona Granges. (Faith).

Pomona Granges shall be composed of all fourth degree members in good standing in the subordinate Granges of the district who have been properly recommended, elected by a majority vote and initiated in the fifth degree.

Pomona Granges shall open in and confer the fifth degree.

It shall be the duty of Pomona Granges to assist in the social, educational, legislative and business interests of the Order in their respective districts, and especially to assume responsibility for Grange growth in the county or district under such system as the State Grange shall provide.

Secretaries of Pomona Granges shall keep a list of members of their Pomona Grange.

SEC. 3. State Granges. (Hope).

(a) State Granges shall be composed of officers and their wives or husbands; past masters and their wives or husbands, all ex-officio, and delegates selected from the Grange membership in the state under such regulation as the State Grange may provide.

The wives or husbands of the delegates to State Grange, if fourth degree members in good standing, shall be voting members in that body.

(b) Where a state has not reduced its representation, any subordinate Grange shall have the right to elect a fourth degree member in good standing, as its representative in the State Grange, when neither the master nor his wife or husband are able to attend.

(c) Pomona Granges may be represented in State Granges under such regulations as the State Grange may provide.

(d) State Granges shall open in the sixth degree and have authority to confer the degree of Flora on all members of the Order in good standing, in their respective states, who have taken the degree of Pomona, and each person receiving the degree shall be entitled to a certificate of membership in

the sixth degree from the National Grange and duly attested by the State Grange under its seal.

SEC. 4. National Grange. (Charity).

The National Grange shall be composed of Masters and Past Masters of State Granges, or other representatives as hereinafter provided, and their wives or husbands, if Fourth Degree members in good standing, who have taken the Degree of Ceres, and the officers and members of the Executive Committee of the National Grange.

Provided, that only those members of the National Grange who are Masters of State Granges, and their wives or husbands, if Fourth Degree members in good standing, shall be entitled to vote therein; except, when the National Master may excuse the Master of a State Grange because of serious illness or death in the immediate family, the executive committee of such State Grange shall appoint in his place some officer, Past State Master, or voting member of that State Grange, who may become the accredited representative of that State Grange at such session, with all the powers and privileges appertaining to the office; and provided further, that Past Masters and their wives or husbands, if Fourth Degree members in good standing, who have taken the Degree of Ceres, and all former members of the National Grange, shall be Honorary members of the National Grange, eligible to office therein, but shall not be entitled to vote.

The National Grange shall open in the Seventh Degree.

SEC. 5. Assembly of Demeter. (Fidelity):

The Assembly of Demeter shall be composed of all members of the Order who have received the Seventh Degree and who are in good standing in a subordinate Grange; provided, however, that only officers of the Assembly, past masters of State Granges and their wives or husbands, and the voting members of the National Grange shall be entitled to vote.

The Assembly of Demeter shall have charge of the secret work of the Order, confer the Seventh Degree, and shall be a trial court of all officers of the National Grange under such rules and regulations as the National Grange may from time to time provide.

ARTICLE III—OFFICERS

SEC. 1. The officers of a Grange, Juvenile, Subordinate, Pomona, State, or National, consist of and rank as follows: Master, overseer, lecturer, steward, assistant steward, chaplain, treasurer, secretary, gatekeeper, Ceres, Pomona, Flora, and lady assistant steward.

*The Officers of the Assembly of Demeter shall be High Priest, Priest Archon, Priest Annalist, Priest Archivist, Priest Treasurer, Priest Hierophant, Priest Interpreter, Priest Orator, Priest First Mystagogue, Priest Second Mystagogue, Priest Conductor, Priest Messenger, Priest Herald, Priest Guardian, Priestess Ceres, Priestess Flora and Priestess Pomona.

It is their duty to see that the laws of the Order are carried out.

SEC. 2. How chosen—In the Subordinate Granges they shall be chosen annually at a regular meeting in December and installed at a regular or special meeting in January or as soon thereafter as practicable, provided such states as desire may elect in November and install as soon after the election as practicable; in the Pomona Grange annually at such time within the last quarter of the year as each State Grange may determine; provided that State Granges shall have the power to provide for biennial election of officers in Pomona Granges in their respective jurisdictions; in the State Granges once in two years; and in the National Grange once in two years; and in the Assembly of Demeter, the High Priest, Priest Archon, and Priest Annalist once in two years, coinciding with the election

in the National Grange; Ceres, Pomona, and Flora elected by the National Grange and the remaining officers appointed by the High Priest.

SEC. 3. The Master of the National Grange may appoint members of the Order as deputies, to organize Granges where no State Grange exists, and in other States with approval of State Master.

SEC. 4. There shall be an Executive Committee of the National Grange, consisting of the Master and three other members, whose term of office shall be three years, one to be elected each year. Such members of said Committee as shall have the management of the funds of the National Grange shall give bonds in the sum of five thousand dollars each, each of said bonds to be approved by the other members of the Committee.

SEC. 5. The officers of the respective Granges shall be addressed as "WORTHY."

ARTICLE IV—MEETINGS.

SEC. 1. Subordinate Granges shall meet at least once each month, and may hold intermediate meetings.

SEC. 2. Pomona Granges shall meet once in three months, and may hold intermediate meetings as may be deemed necessary for the good of the Order.

SEC. 3. State Granges shall meet annually at such time and place as the Grange shall from year to year determine.

SEC. 4. The National Grange shall meet annually on the first Wednesday after the second Monday in November, at such place as the Grange may from year to year determine. Should the National Grange adjourn without selecting the place of meeting, the Executive Committee shall appoint the place and

notify the Secretary of the National Grange and the Masters of State Granges, at least thirty days before the day appointed.

ARTICLE V—LAWS.

SEC. 1. The National Grange, at its annual session, may frame, amend, or repeal such laws as the good of the Order may require. All laws of State, Pomona, and Subordinate Granges must conform to this Constitution and the laws adopted by the National Grange.

ARTICLE VI—RITUAL.

SEC. 1. The Ritual adopted by the National Grange shall be used in all Subordinate Granges, and any desired alteration in the same must be submitted to, and receive the sanction of, the National Grange.

ARTICLE VII—FEES FOR MEMBERSHIP.

SEC. 1. The minimum fee for membership in a Subordinate Grange shall be for men three dollars, and for women one dollar for the four degrees; provided that State Granges shall have power to reduce the fee within their respective jurisdiction to any sum not less than one dollar for men, and fifty cents for women and minors eighteen years of age or under.

SEC. 2. The minimum fee for membership in a Pomona Grange shall be fifty cents.

SEC. 3. The minimum fee for the sixth degree shall be two dollars for each person, one-half to be retained by the State Grange and one-half to be paid to the National Grange.

SEC. 4. The initiation fee for the Seventh Degree shall be two dollars for each person.

ARTICLE VIII--DUES.

SEC. 1. The minimum of regular quarterly dues in a subordinate Grange shall be thirty cents from each member and each Grange may otherwise regulate its own dues; Provided, however, that a State Grange may increase the minimum subordinate Grange dues for the purpose of financing Pomona Granges and for other purposes.

SEC. 2. The Secretary of each Subordinate Grange shall report quarterly to the Secretary of his State Grange the number of persons initiated since his last report, and also the number who, by death, expulsion, removal, or otherwise have ceased to be members within the same time; and shall pay to the Secretary of the State Grange such amount of dues on each member and fees for each person initiated, during the quarter, as the State Grange may determine.

All Juvenile Granges shall be required to make quarterly reports to the State Secretary and to pay a minimum of two cents per member per quarter to the State Grange.

SEC. 3. The Secretary of the State Grange shall pay to the Treasurer of the State Grange all moneys coming into his hands, at least once every thirty days, taking his receipts therefor; and shall report quarterly, to the Secretary of the National Grange, the membership in the state.

The Secretary of the State Grange shall also report quarterly to the Secretary of the National Grange, the dues paying Juvenile Grange membership in the state.

SEC. 4. The Treasurer of each State Grange shall pay to the Secretary of the National Grange, in quarterly installments, the annual dues of sixteen cents for each member in the state except Golden Sheaf members; said installments to be due on April 1st, July 1st, October 1st, and January 1st of each year, and to the Secretaries of the several Pomonas within the State such portions of

the quarterly dues as the State Grange shall determine. The Secretary of the National Grange shall between the first and tenth of each month pay into the hands of the National Treasurer, all moneys in his possession belonging to the National Grange.

The Treasurer of each State Grange shall pay to the Secretary of the National Grange in the same manner that Subordinate dues are paid, one cent per dues paying Juvenile member per quarter, except honorary members.

SEC. 5. The Treasurer of the National Grange shall pay out money only upon order signed by the Secretary of the Executive Committee and countersigned by the Master.

SEC. 6. No State Grange shall be entitled to representation in the National Grange whose dues are unpaid for more than one quarter.

ARTICLE IX—CHARTERS AND DISPENSATIONS.

SEC. 1. All Charters and Dispensations issue directly from the National Grange.

SEC. 2. Thirteen persons, having received the four Subordinate Degrees, of which there shall not be less than four of either sex, may receive a Dispensation to Organize a Subordinate Grange.

SEC. 3. Applications for Dispensations for a Subordinate Grange shall be made to the Secretary of the National Grange, be signed by the persons applying for the same, and be accompanied by a fee of fifteen dollars.

SEC. 3A. Applications for Dispensation for a Pomona Grange shall be made to the Secretary of the National Grange, be signed by the persons applying for the same and be accompanied by a fee of five dollars.

SEC. 4. Charter members are those persons ONLY whose names are upon the application, and whose fees were paid at the time of organization. Their number shall

not be less than thirteen, of which there must be at least four of either sex.

SEC. 5. Fifteen Subordinate Granges working in a State can apply for authority to organize a State Grange.

SEC. 6. Where State Granges are organized, Dispensations for the organization of the Subordinate Granges theretofore, issued, shall be replaced by Charters from the National Grange without further fee; and thereafter all applications for Charters for Subordinate Granges shall pass through the office of the Master of the State Grange, and must be approved by him before they are issued by the National Grange. When so issued, the Charter shall receive the signatures of the Master and Secretary and the seal of the State Grange.

SEC. 7. No Grange shall confer more than two degrees on the same person at the same meeting.

ARTICLE X—DUTIES OF OFFICERS.

SEC. 1. The duties of the officers of the National, State, Pomona and Subordinate Granges shall be prescribed by the laws of the same.

ARTICLE XI—TREASURERS.

SEC. 1. The Treasurers of the National, State, Pomona, and Subordinate Granges shall give bonds, to be approved by the Master and Executive Committee of their respective Granges.

SEC. 2. In all Granges, orders on the Treasurer must be approved by the Master, and countersigned by the Secretary, before the Treasurer can pay the same.

ARTICLE XII—RESTRICTIONS.

SEC. 1. Sectarian or partisan questions will not be tolerated as subjects of discussion in the work of the Order, and no religious or political tests for membership shall be applied.

CONSTITUTION

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ARTICLE XIII—SUSPENSIONS.

SEC. 1. The Master of the National Grange and the Executive Committee shall be empowered to suspend from office any officer of the National Grange who may prove inefficient or derelict in the discharge of his duty, subject to appeal to the next session thereafter of the National Grange.

ARTICLE XIV—AMENDMENTS.

SEC. 1. This constitution can be altered or amended by a two-thirds vote of the National Grange at any annual meeting, and when such alteration or amendment shall have been ratified by two-thirds of the State Granges, and the same reported to the Secretary of the National Grange, it shall be of full force.

CHAPTER V.

BY-LAWS
OF THE
NATIONAL GRANGE PATRONS
OF HUSBANDRY.

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By-Laws of the National Grange Patrons of Husbandry.

ARTICLE I—ANNIVERSARY.

SEC. 1. The fourth day of December, the birthday of the Patrons of Husbandry, shall be celebrated as the anniversary of the Order.

ARTICLE II—QUORUM.

SEC. 1. Not less than a majority of the State Granges entitled to representation in the National Grange shall constitute a quorum for the transaction of business.

ARTICLE III—LAW AND USAGE.

SEC. 1. Questions of law or usage arising in a subordinate or Pomona Grange, or referred to the master thereof by a member thereof, shall be decided by the master of such subordinate or Pomona Grange, subject to an appeal to the master of the State Grange. (See Sec. 16, page 82.)

SEC. 2. Questions of law or usage arising in the State Grange, or referred to the Master thereof by any member thereof, or brought by appeal from the decision of a Master of a Subordinate or Pomona Grange, shall be decided by the Master of the State Grange, subject to an appeal to the Master of the National Grange.

SEC. 3. Questions of law or usage arising in the National Grange, or referred to the Master thereof by any member of the National Grange, or brought by appeal from the decision of a Master of a State Grange, shall be decided by the Master of the National Grange, whose decision thereon shall be final.

ARTICLE IV—MASTER.

SEC. 1. It shall be the duty of the Master to preside at meetings of the National Grange; to see

that all officers and members of the committees properly perform their respective duties; to see that the Constitution, By-Laws, and Resolutions of the National Grange, and the usages of the Order are observed and obeyed, and generally to perform all duties pertaining to such office.

SEC. 2. The Master of the National Grange shall report to each session of the National Grange all rulings made since his last report.

ARTICLE V—OVERSEER.

SEC. 1. It shall be the duty of the Overseer to fill the Master's Station in the absence of the Master. In case the Master's station becomes vacant, the Overseer shall become Master upon being duly installed by any Past Master or by any member of the Executive Committee, to hold office until the next regular session of the Grange.

ARTICLE VI—SECRETARY.

SEC. 1. It shall be the duty of the Secretary to keep a record of all proceedings of the National Grange; to receive all moneys and keep a just and true account of the same; to conduct the correspondence of the National Grange; and to perform such other duties appertaining to his office as may be required by the Master and Executive Committee.

The Executive Committees of the National Grange and of the State Granges shall have the authority to employ such assistants for their respective Secretaries as they deem necessary, and determine their duties.

SEC. 2. It shall be his duty, between the first and tenth day of each month, to pay to the Treasurer of the National Grange all moneys in his possession belonging to the National Grange, taking a receipt therefor.

SEC. 3. He shall give bond in such sum and with such security as may be approved by the Executive Committee.

ARTICLE VII—TREASURER.

SEC. 1. It shall be the duty of the Treasurer to receive all moneys from the Secretary, giving a receipt therefor; to keep a correct account of all receipts and expenditures of the National Grange; to pay all drafts drawn on the Treasurer that have been signed by the Secretary of the Executive Committee and countersigned by the Master of the National Grange.

SEC. 2. He shall report monthly to the Master of the National Grange, giving a statement of all moneys received and bills paid by him during the previous month.

SEC. 3. He shall report to the National Grange at each annual session, giving a statement of all moneys received and bills paid by him since his last annual report. He shall include in his annual report a record of all bonds and securities bought and sold during the year, and shall show the rate of interest and due date of all bonds on hand and their market value at the time the report is made.

ARTICLE VIII—LECTURER.

SEC. 1. It shall be the duty of the Lecturer to visit, for the good of the Order, such portions of the United States as the Master and the Executive Committee may direct, for which services he shall receive compensation.

ARTICLE IX—EXECUTIVE COMMITTEE.

SEC. 1. It shall be the duty of the Executive Committee to exercise a general supervision of the affairs of the Order during the recess of the National Grange. They shall have authority to act on all

matters of interest to the Order when the National Grange is not in session; shall provide for the welfare of the Order in business matters; and no disbursements, not excepting salaries, shall be made except by the order of the Committee; and shall report their acts in detail to the National Grange on the first day of its annual meeting, or as soon thereafter as practicable. They shall include in such report what action has been taken with reference to the resolutions passed at the previous session of the National Grange and the results obtained.

SEC. 2. The Executive Committee shall hold one regular session in each year, immediately before and during the annual session of the National Grange, at the place selected for holding such session, at which meeting the Secretary and Treasurer shall be present with their books and accounts for examination by the Executive Committee. It may also hold other meetings, when in the opinion of the Master or of any two members of the Executive Committee, such meetings may be necessary for the good of the Order.

SEC. 3. The Master and the Executive Committee shall constitute a Court of Appeals, to which shall be referred all appeals taken to the State or (and) National Grange. Said court shall try all causes which may be brought before it, at its first sitting thereafter, but may continue the same when in its judgment justice requires it. It shall preserve a record of its proceedings, in which the opinions of the court shall be set forth.

SEC. 4. The Executive Committee of a Grange, National, State, Pomona, or Subordinate, cannot act authoritatively for the Grange between Grange sessions, without the approval of the Master.

ARTICLE X—COMPENSATION OF OFFICERS.

SEC. 1. The compensation of all officers of the National Grange shall be fixed at the session of the biennial election, and prior to the election of said officers and shall not be reduced or increased during the term of office.

SEC. 2. Whenever general Deputies are appointed by the Master of the National Grange, said Deputies shall receive such compensation for time and services as may be determined by the Master and the Executive Committee.

ARTICLE XI—COMPENSATION OF MEMBERS.

SEC. 1. Each session of the National Grange shall fix the compensation of its members.

ARTICLE XII—DATE OF REPORTS.

SEC. 1. The financial reports of Subordinate Granges shall be made on the first day of January, the first day of April, the first day of July, and the first day of October.

SEC. 2. State Granges shall date their financial existence three months after the first day of January, first day of April, first day of July, and the first day of October immediately following their organization.

SEC. 3. The financial year of the National Grange shall close on the 30th day of September.

ARTICLE XIII—SPECIAL MEETINGS.

SEC. 1. Special meetings of the National Grange shall be called by the Master upon the application of the Masters of twenty State Granges, one month's notice of such meeting being given to all voting members of the National Grange. No alterations or amendments of the By-Laws or Ritual shall be made at any special meeting.

ARTICLE XIV—AYES AND NOES.

SEC. 1. Upon the demand of five members, the ayes and noes may be called on any question, and when so called shall be entered by the Secretary upon his minutes.

ARTICLE XV—PAST MASTERS.

SEC. 1. Past Masters are Masters who have been duly elected and installed, and who have served out the term for which they were elected.

ARTICLE XVI—VACANCIES.

SEC. 1. Vacancies in office may be filled, by election, at any regular meeting of the Grange.

ARTICLE XVII—CONSOLIDATIONS.

SEC. 1. Two or more Subordinate Granges may be consolidated in the manner following, to wit:

Application for permission to consolidate shall be made to the Master of the State Grange and his consent obtained. One of the consolidating Granges shall then vote to surrender its charter and to consolidate with the other; and the other must vote to receive all members of the surrendering Grange.

A copy of each vote, duly authenticated, must be transmitted to the Secretary of the State Grange, and the surrendered charter must be returned to the National Grange through the office of the Secretary of the State Grange, with the fact and date of its surrender and consolidation endorsed thereon, authenticated by the seal and signature of the Secretary of the State Grange; provided, that nothing herein contained shall be construed to authorize the surrender of the charter of a Grange in which thir-

teen persons, of which there shall not be less than four of either sex, shall desire to continue the organization thereof.

ARTICLE XVIII—SUSPENSIONS AND REVOCATIONS.

SEC. 1. In case satisfactory evidence comes to the Master of a State Grange that a Grange has been organized contrary to the laws and usages of the Order, or is working in violation of the same, or is in arrears for dues for two or more quarters, it shall be the duty of the Master to suspend the charter of such offending Grange, if in his opinion the good of the Order requires such action, and if in his judgment the good of the Order demands the revocation of the charter, he shall report his action suspending the charter, with an abstract of the testimony upon which it was based to the National Grange, with his reason therefor.

SEC. 2. Granges whose charters are thus suspended or revoked may appeal to the National Grange at its next session for the final action of that body.

ARTICLE XIX—JURISDICTION.

SEC. 1. Members of the State, Pomona, and Subordinate Granges shall be amenable to their respective Granges under such regulations as may be prescribed by the State Granges for the trial of causes in their respective jurisdictions, provided that the members of subordinate and Pomona Granges shall be allowed the right of appeal to their State Granges, and members of the State Grange shall be allowed the right of appeal to the court of appeals.

SEC. 2. A member of the Order not a voting member of the National Grange having charges preferred against him in the National Grange, for

offenses against the National Grange, or any of its members, shall be tried by a committee of three appointed by the Master and Overseer of the National Grange, the Master to appoint a majority of said committee. The trial shall be held in the jurisdiction of the Subordinate Grange where the accused resides. The said committee shall notify both parties of their findings and report the same to the National Grange, at its next session, and if found guilty, the member may be reprimanded or suspended by majority vote, or may be expelled from the Order by two-thirds vote, and the decision of the National Grange shall be final.

ARTICLE XX—OFFICERS' REPORTS.

SEC. 1. Each officer required by law to report to the National Grange at its annual sessions shall furnish, in connection with his report, an itemized statement of the expenses of his office for the current year.

ARTICLE XXI—REPORTS FROM STATE GRANGES.

SEC. 1. The Secretary of each State Grange shall send to the Secretary of the National Grange two printed copies of the proceedings of his State Grange as soon as practicable after each annual session, and also copies of the Constitution and By-Laws of his State Grange, whenever a revision or important amendment has been made to the same, and the Secretary of the National Grange shall preserve in his office one copy of each of these documents.

ARTICLE XXII—OFFICIAL COMMUNICATION.

SEC. 1. A copy of any official communication sent to the Subordinate or Pomona Granges of any State,

by the National Grange, its officers or members, shall be sent to the Master of the State Grange in which Subordinate or Pomona Grange is located, at the time such communication is sent to said Grange or Granges.

ARTICLE XXIII—NATIONAL GRANGE MONTHLY

SEC. 1. The National Grange Monthly shall be the official organ of the National Grange, and shall be published by the National Grange Monthly Publishing Company, a corporation incorporated under the laws of Delaware.

SEC. 2. The National Grange shall hold all the voting stock of the National Grange Monthly Publishing Company, which stock shall be voted at any meeting of the corporation by the Executive Committee in accordance with instructions by the National Grange by means of proxies equally divided among the members of such committees.

SEC. 3. The Secretary of the National Grange shall issue the proxies annually to the members of the newly constituted Executive Committee after the annual election, together with such instructions, as to the exercise of the rights under the proxies, as the National Grange shall determine.

SEC. 4. The property and business of the National Grange Monthly Publishing Company shall be under the supervision of a Board of Directors consisting of the Executive Committee of the National Grange and the Board of Managers of the National Grange Monthly Publishing Company. Such Board of Managers shall consist of three members to be elected by the National Grange for terms of three years each, one member to be elected each year. At the annual election of the Board of Directors the Executive Commit-

tee of the National Grange shall cast the votes of the National Grange, which they represent by proxy, for the directors as prescribed in this section.

SEC. 5. The details of publishing the National Grange Monthly shall be under the management of a sub-committee of the Board of Directors of the National Grange Monthly Publishing Company, consisting of the members of the Board of Managers as elected by the National Grange, with the Master of the National Grange as an ex-officio member. They shall carry out the policies as determined by the National Grange.

SEC. 6. The employment of the Editor or Manager, the determination of his compensation, and the management of the finances of the National Grange Monthly Publishing Company, shall be under the control of the Board of Directors; provided, that the Board may delegate any or all of these duties for a period of one year or less, to the sub-committee consisting of the Board of Managers. The Master of the National Grange shall be Editor-In-Chief.

SEC. 7. Except on instructions of the National Grange no member of the Executive Committee of the National Grange shall vote to sell, transfer, or mortgage the plant, or other assets of the National Grange Monthly Publishing Company, or to modify the provisions of the by-laws of the National Grange Monthly Publishing Company, which establish the Board of Managers as a sub-committee and define their powers and duties.

ARTICLE XXIV—AMENDMENTS

SEC. 1. These by-laws may be altered or amended at any annual meeting of the National Grange by a two-thirds vote of the members present.

Exhibit AA

From: Bob McFarland [mailto:bobupthecreek@yahoo.com]
Sent: Tuesday, June 15, 2010 4:30 PM
To: Jessica Cope
Subject: RE: Non Profit Mail Assistance Requested

Thanks. - B.

Grangestock! *Groovy Music, food & fun* **July 17**

<http://www.grangestock.com>

Bob McFarland, President

California State Grange

bobupthecreek@yahoo.com
(916) 454-5805 / (916) 768-9800

--- On Tue, 6/15/10, Jessica Cope <jcope@nationalgrange.org> wrote:

From: Jessica Cope <jcope@nationalgrange.org>

Subject: RE: Non Profit Mail Assistance Requested
To: "Bob McFarland" <bobupthecreek@yahoo.com>
Cc: "Edward Luttrell" <ELuttrell@nationalgrange.org>
Date: Tuesday, June 15, 2010, 12:00 PM

Bob,

I'm sending this to Amber Casey, our Controller. She will gather the IRS info for you. I'll coordinate a letter with her. Ed will be in the office next week to sign.

Jessie Cope

Executive Assistant and Meeting Planner

1616 H Street, NW 11th Floor

Washington, DC 20006

Phone: (202) 628-3507 x113

Fax: (202) 347-1091

jcope@nationalgrange.org

SAVE THE DATE!

50th Anniversary Rededication of the National Grange Building

June 26, 2010

Washington, DC

For more information visit [National Grange 50th Anniversary](#)

From: Bob McFarland [<mailto:bobupthecreek@yahoo.com>]
Sent: Tuesday, June 15, 2010 2:24 PM
To: Jessica Cope
Cc: Edward Luttrell
Subject: Non Profit Mail Assistance Requested

Jessie - The California State Grange is applying for non profit mail status which will save us \$1,000 - \$1,300 per issue of our newsletter.

According to the IRS, we need a letter on National Grange letterhead, stating:

"The California State Grange is a subordinate of the National Grange of the Order of Patrons Husbandry."

Signed President Luttrell, or the Secretary.

We also need a copy of the National Grange IRS non profit determination letter, to accompany it.

Our fax number is: 916-739-8189.

Much appreciated - Bob

Grangestock! *Groovy Music, food & fun* July 17

<http://www.grangestock.com>

Bob McFarland, President

California State Grange

bobupthecreek@yahoo.com
(916) 454-5805 / (916) 768-9800

--

Ed Luttrell

National Grange of the Order of Patrons of Husbandry

1616 H St., NW

Washington, DC 20006

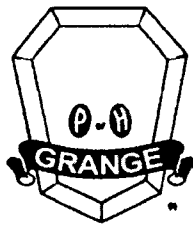
202.628.3507 ext. 112 (phone)

202.347.1091 (fax)

eluttrell@nationalgrange.org

www.nationalgrange.org

Exhibit BB



NATIONAL GRANGE

OF THE ORDER OF PATRONS OF HUSBANDRY

1616 H ST. NW, WASHINGTON, DC 20006 | PHONE (202) 628-3507 | FAX (202) 347-1091

Grange is a family affair

September 20, 2012

To all California Granges,

Due to actions of your Executive Committee, I, with the advice and consent of the National Grange Executive Committee, was forced to suspend the Charter of the California State Grange on September 17, 2012, based on the determination that the good of the order requires such action.

Attached is the suspension document. It is our hope and goal to reinstate the Charter of the State Grange as quickly as the current situation can be resolved.

This suspension will not impact your Grange activities at the Community or Pomona level. However, as of this date, your upcoming State Session will be canceled until further notice. All activities of the State Grange will be coordinated through the National Grange until the issues surrounding the suspension are resolved. Please contact the National Grange Deputy, Bob Clouse, for any Grange business concerning your Community or Pomona Grange. Bob's phone is (916) 988-3457 and email is bob@clouseins.com.

Our structure and rules give our Community, Pomona, and State Granges great flexibility and autonomy, but it also requires that they follow our fundamental rules. By their actions, the majority of your Executive Committee has chosen to attempt to obliterate our structure and rules which have been in place and adhered to since 1873.

It is clear that there is dysfunction within the State Grange and that dissension and deep divisions within the California Grange exist. These are problems that must be resolved to ensure that the Order moves forward. This issue is not one of personalities, but of fundamental rules and structure.

From the last issue of the California Grange News it is apparent that part of the leadership of the California State Grange has and continues to make statements and claims that are not accurate or conducive to harmony and unity. These and similar actions by other members are contrary to the philosophy of our organization. The National Grange will continue to protect the rights of every member, including the suspended Master, while protecting the integrity of our Order. This means we cannot discuss the charges against him. The suspended Master is provided due process rights under Grange Law and will have the ability to defend the charges against him.

Our organization has served the State of California for the past 139 years and without following our principles as stated in the By-Laws it is not possible to ensure the sustainability and growth of our Order. I encourage your Grange to continue your good work on behalf of your communities. I ask that each member remember their obligations and have patience through these trying times.

Fraternally Yours,

Edward L. Luttrell, Master
National Grange

September 17, 2012

To the Acting Master of the California State Grange,

Article V of The Digest of Laws Order of Patrons of Husbandry ("Digest of Laws") outlines the process by which suspension or revocation of a Charter can occur. Specifically, section 4.5.7 of the Digest of Laws sets forth the criteria for which a State Grange Charter may be suspended or revoked. The criteria for suspension or revocation of a State Grange Charter are satisfied when "...The State Grange is working in violation of the law and usages of the Order..."

In early August, State Grange Master Bob McFarland was suspended according to Digest of Laws rules which are incorporated by Section I, Article II; Section I, Article IX; Section II, Article XIV (14.13) of the Digest of Laws of the California State Grange. As a result of the suspension, the Overseer was to take over until the Grange Judicial process was completed. Bob McFarland and a majority in interest of the State Grange Executive Committee have failed to acknowledge the suspension of Bob McFarland.

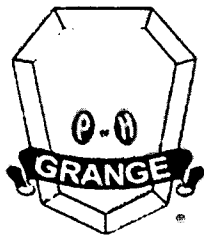
The majority of the California State Grange Executive Committee, acting as the California State Grange, has failed to enforce the rules of the Order requiring the Master of the California State Grange to follow the rules of the Order, i.e. accept his suspension; by failing to acknowledge the authority of the Acting Master of the California State Grange including holding a duly-noticed Executive Committee meeting and conducting business without the presence of the Acting Master with a vote of all Executive Committee members, by refusing to respond to requests of the Acting State Master, National Master, and the National Grange for confirmation of desire to follow the rules of the Order; and for engaging legal representation with the support of the suspended State Grange Master.

Finding that the good of the order requires such a determination, I therefore suspend the Charter of the California State Grange. With the advice and consent of the Executive Committee of the National Grange, the suspension will be for a period of six months or until the California State Grange can be returned to working order and avoid revocation of the State Grange Charter.



Edward L. Luttrell, Master
National Grange

Exhibit CC



NATIONAL GRANGE

OF THE ORDER OF PATRONS OF HUSBANDRY

1616 H ST. NW WASHINGTON, DC 20006 | PHONE (202) 628-3507 | FAX (202) 347-1091

April 5, 2013

To the Officers of the Suspended State Grange of California:

Chapter 1, Article III, Section 1.3.1 to the Constitution of the Order of Patrons of Husbandry establishes the National Grange, as the national representative division of the Order, shall be the controlling and supreme law making division of the Order from which body all the other Granges of the divisions of the Order shall derive their rights and powers. The National Grange shall have the right and power as the good of the Order requires to adopt laws for the organization, administration, and regulation of the affairs of the various Granges of the divisions of the Order including laws limiting, defining, and regulating the powers of the various Granges of the divisions of the Order. (Chapter 1, Article III, Section 1.3.1)

The Constitution of the California State Grange Article II states that the State Grange, as a chartered division of the National Grange, shall have the right and power, as the good of the Order requires, to adopt laws for the organization, administration, and regulation of the affairs of the various divisions of the State Grange, including laws limiting, defining, and regulating the powers of the various Granges of the divisions of the State Grange, so long as they do not conflict with the laws of the National Grange.

Chapter 4, Article V, of the By-Laws for the Order of Patrons of Husbandry, outline the procedure for suspension or revocation of a Charter. Chapter 4, Article V, Section 4.5.7 establish the criteria for the Suspension or Revocation of a State Grange Charter. The criteria includes when the State Grange is working in violation of the law and usages of the Order or when dues are not received by the National Grange for two consecutive quarters. Chapter 4, Article V, Section 4.5.11 provides that the remedy of revocation of a Charter is intended to be used when the judgment of the Master of the Grange having jurisdiction, the deficiencies in the criteria are incapable of being remedied or may not be remedied within a reasonable time.

On September 17, 2012, the Charter of the California State Grange was suspended by the National Grange Master with the advice and consent of the Executive Committee of the National Grange for violation of the laws and usages of the Order, as follows:

"In early August, State Grange Master Bob McFarland was suspended according to Digest of Laws rules which are incorporated by Section I, Article II; Section I, Article IX; Section II, Article XIV (14.13) of the Digest of Laws of the California State Grange. As a result of the suspension, the Overseer was to take over until the Grange Judicial process was completed. Bob McFarland and a majority in interest of the State Grange Executive

Committee have failed to acknowledge the suspension of Bob McFarland. The majority of the California State Grange Executive Committee, acting as the California State Grange, has failed to enforce the rules of the Order requiring the Master of the California State Grange to follow the rules of the Order, i.e. accept his suspension; by failing to acknowledge the authority of the Acting Master of the California State Grange including holding a duly-noticed Executive Committee meeting and conducting business without the presence of the Acting Master with a vote of all Executive Committee members, by refusing to respond to requests of the Acting State Master, National Master, and the National Grange for confirmation of desire to follow the rules of the Order; and for engaging legal representation with the support of the suspended State Grange Master."

Since that time, the suspended California State Grange has made no effort to work with the National Grange to resolve the issues which resulted in the suspension. The suspended California State Grange has repeatedly conducted a destructive public relations campaign against the National Grange, the Master of the National Grange, and California Grange members who disagree with the actions of the suspended State Grange. The Leadership of the California State Grange has sought to prevent internal Grange procedures from being conducted to enforce the By-Laws of the Order. It is the duty of the officers of the California State Grange to ensure that the Constitution and By-Laws of the Grange at all levels are observed and obeyed, and generally to perform all duties pertaining to their elected office, as contained in the Constitution, By-Laws, and Manual of the Degrees of the Order. This duty has not been upheld. The Suspended State Grange leadership has improperly used rules to remove from office any dissenters to their view, and to attempt to expel from membership other California Grange officers who stated that they would follow the rules of the Order. Consistent with Chapter 4, Article V, Section 4.5.7 of the By-Laws, the California State Grange is working in violation of the law and usages of the Order. This is grounds for the revocation of the Charter.

The suspended State Grange Master has admitted in public, and one of his deputy's has admitted, to organizing or re-organizing at least one Community Grange outside the Chartering process which is authorized only through the National Grange. This action amounts to a violation of Chapter 4, Article III, Section 4.3.1 of the By-Laws as Charters can only be issued by the National Grange. Such action is grounds for revocation of the California State Grange Charter.

In addition the last quarterly report and payment received by the National Grange from the suspended California State Grange was the second (2nd) quarter report thereby putting the California State Grange more than two quarters behind in dues and quarterly reports. Consistent with Chapter 4, Article V, Section 4.5.7, this is grounds for immediate revocation of the Charter.

It is my judgment that the current situation with the California State Grange cannot be remedied at this time nor does there appear to be any remedy to this situation within the foreseeable future for the stated reasons listed above and the fact that the California State

Grange continues to advocate the position that they are not subject to the rules of the Grange due to their interpretation of State law which is unlikely to be resolved in the near future. After consulting with the Executive Committee of the National Grange and for the good of the Order, I hereby revoke the Charter of the California State Grange as of today, April 5, 2013 on the grounds that the California State Grange is continuing to work in violation of the law and usages of the Order and shows no desire to abide by the rules of the Order of Patrons of Husbandry.

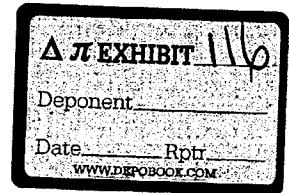
Fraternally,

A handwritten signature in cursive script, appearing to read "Edward L. Luttrell".

Edward L. Luttrell, Master
The National Grange

cc: National Grange Executive Committee
cc: Bob Clouse, Deputy
cc: California Community and Pomona Granges

Exhibit DD



California State Grange

3830 U Street Sacramento, California 95817
(916) 454-5805 / fax: (916) 739-8189
info@californiagrango.org

Position Statement

November 8, 2013

To the Executive Committee of the National Grange:

The Executive Committee of the California State Grange, a California Corporation, wishes to inform the National Grange of a change in our structure.

For 140 years, the California State Grange has enjoyed a positive affiliation with the National Grange. This past year has seen a dramatic change in the relationship between the National Grange and the California State Grange and the revocation of our fraternal relationship.

To preserve our corporate structure and protect and serve our members, by unanimous vote of the delegates at our 141st annual meeting, the California State Grange amended our By-Laws to acknowledge that we are no longer affiliated with the National Grange.

Sincerely,

Bob McFarland, *President*
Kathy Bergeron, *Vice President*
Executive Committee
Bill Thomas, *Chairman*
Jon Luvaas
Damian Parr
Takashi Yogi
Lawrence Jaffe
Leo T. Bergeron, *Chief Deputy*

Exhibit EE

3649252

FILED
Secretary of State
State of California

FEB 21 2014

ARTICLES OF INCORPORATION
OF
THE GRANGE OF THE STATE OF CALIFORNIA'S ORDER OF PATRONS OF
HUSBANDRY, CHARTERED

ARTICLE I

That the name of this corporation is:

The Grange of the State of California's Order of Patrons of Husbandry, Chartered

ARTICLE II

(a) This corporation is a nonprofit mutual benefit corporation organized under the Nonprofit Mutual Benefit Corporation Law. The purpose of this corporation is to engage in any lawful act or activity other than credit union business for which a corporation may be organized under such law.

(b) The corporation is organized and operated for the purposes set forth under Internal Revenue Code Section 501(c)(5).

(c) The specific purpose of the corporation is to serve as the sole State Grange for the State of California authorized and chartered by The National Grange.

(d) Notwithstanding any of the above statements of purposes and powers, this corporation shall not, except to an insubstantial degree, engage in any activities or exercise any powers that are not in furtherance of the specific purposes of this corporation.

ARTICLE III

The name and address of the corporation's initial agent for service of process are Ed Komski located at 1311 Willow Glen Road, Fallbrook, CA 92028.

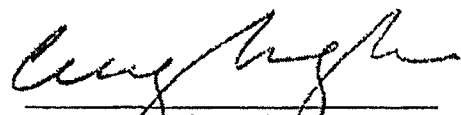
ARTICLE IV

The initial street and mailing address of this corporation is 1311 Willow Glen Road, Fallbrook, CA 92028.

ARTICLE V

No part of the net earnings of the corporation shall inure to the benefit of any member or private shareholder.

Date: February 21, 2014


Craig Engle, Incorporator



I hereby certify that the foregoing
transcript of _____ page(s)
is a full, true and correct copy of the
original record in the custody of the
California Secretary of State's office.

FEB 27 2014 PS

Date: _____

Debra Bowen
DEBRA BOWEN, Secretary of State

Exhibit FF

SMITH, SILBAR & PARKER, LLP
Keith M. Parker, Esq., Bar No. 107693
Lisa Welch Silbar, Esq., Bar No. 117723
19100 Von Karman Avenue, Suite 400
Irvine, California 92612

Telephone: (949) 263-8066
Facsimile: (949) 263-8073

Attorneys for the CALIFORNIA STATE GRANGE

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO - NORTH COUNTY REGIONAL CENTER

CALIFORNIA STATE GRANGE, a non-
profit corporation,

Plaintiff,

vs.

VISTA GRANGE, NO. 609, aka
AGRICULTURAL ASSOCIATION OF
VISTA, a non-profit corporation;
and DOES 1-50,

Defendants.

Case No. 37-2009-00052675-CU-OR-NC

COMPLAINT FOR:

- 1) QUIET TITLE
- 2) CLAIM AND DELIVERY
- 3) CONVERSION
- 4) CONSTRUCTIVE TRUST
- 5) DECLARATORY RELIEF
- 6) DISSOLUTION OF CORPORATION

Plaintiff California State Grange, a non-profit corporation, for causes of action against Vista Grange, No. 609, aka Agricultural Association of Vista, a non-profit corporation, and Does 1 through 50, inclusive (collectively "Defendants") and each of them, alleges as follows:

I. PRELIMINARY ALLEGATIONS

1. This action is brought in the Superior Court for the County of San Diego pursuant to C.C.P. § 392 because the real property at issue is located in the County of San Diego.

1 2. This action is filed in the North County Regional
2 Center pursuant to San Diego Superior Court Rule 1.2.2(C) because
3 the real property at issue is located in the City of Vista.

4 **II. THE PARTIES**

5 3. Plaintiff California State Grange is a California
6 non-profit corporation with its principal place of business in
7 Sacramento, California. The California State Grange is a division
8 of the Order of Patrons of Husbandry (the "Order"), a national, non-
9 profit agricultural organization established in 1867. The
10 California State Grange was first organized as an unincorporated
11 association in 1873.

12 4. Defendant Vista Grange, No. 609, aka Agricultural
13 Association of Vista (the "Vista Grange"), is a California non-
14 profit corporation with its principal place of business in Vista,
15 California. The Vista Grange was until January 21, 2009, a division
16 of the Order and a Subordinate Grange member of the California State
17 Grange; the Vista Grange was first organized as an unincorporated
18 association in or before May 1942.

19 5. The California State Grange does not know the true
20 names or capacities of the defendants named herein as Does 1 through
21 50, inclusive, and the California State Grange will amend this
22 complaint to state the true names and capacities of such defendants
23 as and when they have been ascertained. The California State Grange
24 is informed and believes, and on that basis alleges, that each of
25 the defendants named herein as Does 1 through 50, inclusive,
26 participated in the acts and/or omissions hereinafter alleged and,

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1 as a result, are responsible for the injuries and damages sustained
2 by the California State Grange as hereinafter alleged.

3 6. The California State Grange is informed and believes,
4 and on that basis alleges, that at all times mentioned herein, each
5 of the Defendants, including those named as Does 1 through 50,
6 inclusive, was the agent, servant, partner or employee of each of
7 the other Defendants, and in participating in the acts and/or
8 omissions hereinafter alleged was acting within the course and scope
9 of such agency and with the permission, consent of and ratification
10 by such other Defendants.

11 **III. FACTS COMMON TO ALL CAUSES OF ACTION**

12 **A. The Order of Patrons of Husbandry**

13 7. The Order is the oldest national non-profit
14 agricultural organization in the United States, having been formed
15 in the years following the Civil War to unite private citizens in
16 improving the economic and social position of the nation's farm
17 population. The Order has over 300,000 members in 3600 communities
18 in 37 states. The Order provides service to agricultural and rural
19 areas on a wide variety of issues, including economic development,
20 education, family endeavors and legislation designed to ensure a
21 strong and viable rural America.

22 8. The Order consists of 6 divisions, including the
23 National Grange, State Granges (such as the California State
24 Grange), and Subordinate Granges (such as the Vista Grange). The
25 National Grange is the controlling and supreme law making division
26 of the Order from which all other divisions of the Order derive
27 their rights and powers. Pursuant to the Constitution of the Order,

28 ///

1 the National Grange has the power to adopt, amend or repeal Articles
2 of Incorporation, By-Laws and Grange Laws which govern the
3 organization, administration and regulation of the affairs of
4 various divisions of the Order. State Granges are chartered by the
5 National Grange and are responsible for the organization,
6 administration and regulation of the affairs of the divisions of the
7 Order (including Subordinate Granges) within a particular state, so
8 long as such activities do not conflict with the laws of the
9 National Grange. Subordinate Granges are chartered by the National
10 Grange, with the approval of the responsible State Grange, and are
11 membership organizations operating within local communities for the
12 purposes of the Order.

13 9. Pursuant to the Constitution of the Order, the
14 various divisions of the Order may incorporate, and adopt articles
15 of incorporation and by-laws for that purpose, provided that such
16 articles of incorporation and by-laws conform to the Constitution,
17 Articles of Incorporation, By-Laws and Grange Laws adopted by the
18 National Grange.

19 10. Pursuant to the Constitution of the Order and the By-
20 Laws of the National Grange, a Subordinate Grange may not sell,
21 encumber or transfer any real property held by such Subordinate
22 Grange without the prior written consent of the responsible State
23 Grange. Moreover, if a Subordinate Grange surrenders its charter,
24 either through consolidation, dissolution or abandonment, or has its
25 charter revoked, the real and personal property held by such
26 Subordinate Grange is required to be transferred to the responsible
27 State Grange for use in accordance with the purposes of the Order.

28 ///

1 11. Pursuant to the By-Laws of the National Grange, the
2 Master (President) of a responsible State Grange has the authority
3 to suspend and/or remove the Master of a Subordinate Grange for,
4 among other things, failure or refusal to obey the laws of the
5 National Grange or State Grange. In the event that a Master of a
6 Subordinate Grange is removed from office, the vacancy created
7 thereby is required to be filled by an election not later than the
8 second regular meeting of the affected Subordinate Grange after the
9 event of the vacancy.

10 12. Pursuant to the By-Laws of National Grange, the
11 Master of a responsible State Grange may suspend and/or revoke the
12 charter of a Subordinate Grange if it is determined that the
13 Subordinate Grange is "working in violation of the law and usages of
14 the Order". A Subordinate Grange whose charter is suspended and/or
15 revoked may appeal the decision to the Master of the National
16 Grange.

17 **B. The Vista Grange**

18 13. The Vista Grange was first established as an
19 unincorporated association pursuant to a charter approved by the
20 California State Grange and issued by the National Grange. The
21 charter of the Vista Grange provides that

22 "officers and members of the Grange hereby
23 constituted, and their successors, shall at all
24 times comply with the Constitution of the
25 National Grange and of the State Grange before
26 mentioned, and all laws, rules and regulations,
27 passed in accordance therewith."

28 ///

1 14. In or about May 1942, the Vista Grange elected to
2 incorporate as a California non-profit corporation. In compliance
3 with the Constitution of the National Grange, the Articles of
4 Incorporation of the Vista Grange in force through and including
5 January 7, 2009, provide at Article VII that the "constitution and
6 bylaws of Vista Grange,... an existing unincorporated association,
7 shall be adopted by the directors ... as the constitution and bylaws
8 of this corporation" and that such constitution and by-laws "may
9 thereafter be amended or repealed ... as may be in conformity with
10 the rules and regulations of the California State Grange."

11 15. The By-Laws of the Vista Grange in force through and
12 including January 7, 2009, provide at Article III, Section 1, that
13 all "candidates for membership and elected officers [of the Vista
14 Grange] shall be required to agree at the time of election to
15 membership or installation in office that at all times they will
16 faithfully comply with the Constitution, By-Laws and Codes of the
17 Grange at all levels, as from time to time adopted."

18 16. Article XI, Section 1, of the By-Laws of the Vista
19 Grange in force through and including January 7, 2009, provide that
20 proposed amendments to such By-Laws, after being properly approved
21 by the membership of the Vista Grange, must be sent to the Master of
22 the California State Grange for approval before becoming effective.

23 17. Article X, Section 1, of the By-Laws of the Vista
24 Grange in force through and including January 7, 2009, provide that
25 on dissolution of the Grange, including as a result of the
26 revocation of its charter, the Vista Grange

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28 ///

1 "shall remit to the California State Grange all
2 remaining funds, and personal property of this
3 Grange.... Any title to any real property of this
4 Grange shall be transferred to the California
5 State Grange, to be disposed of in accordance
6 with the provisions of the By-Laws of the
7 National Grange."

8 Article X, Section 2, of such By-Laws further provides:

9 "If the Grange is unable to have meetings at
10 which a quorum is present, for the dissolution of
11 this Grange, or if the charter is revoke[d], the
12 Executive Committee of the [California] State
13 Grange is hereby given the authority to act in
14 the interests of the Grange as provided for in
15 Section 1 of Article X."

16 **C. Revocation of Charter of Vista Grange**

17 18. In or about December 1949, Vista Grange acquired
18 certain real property (the "Real Property") located at 1050 South
19 Santa Fe Avenue, Vista, California, more particularly described in
20 Exhibit A hereto, and erected and maintained a Grange Hall thereon
21 for use in furtherance of the purposes of the Order; the Vista
22 Grange continues to hold title to the Real Property. In addition,
23 the Vista Grange acquired and holds certain personal property (the
24 "Personal Property"), including its charter, awards, historical and
25 financial records, regalia and bank accounts, for use in furtherance
26 of the purposes of the Order.

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28 ///

1 19. Beginning in or about August 2005, and continuing to
2 this date, certain officers and members of the Vista Grange,
3 including its Master, Hank Hitt ("Mr. Hitt"), and Treasurer, Del
4 McCracken ("Mr. McCracken"), embarked upon a course of conduct
5 designed to divert the assets of Vista Grange, including the Real
6 Property and the Personal Property, from use for the purposes of the
7 Order to other unrelated uses, including use for their personal
8 benefit.

9 20. On or about November 6, 2005, Mr. Hitt, as Master of
10 the Vista Grange, sent a letter to the California State Grange
11 advising it of the alleged decision of the membership of the Vista
12 Grange to sell the Real Property and soliciting the approval of the
13 California State Grange for such sale. On or about December 15,
14 2005, the California State Grange notified the Vista Grange that its
15 request for approval of the sale of the Real Property was incomplete
16 because it failed to provide a summary of the reasons for the
17 proposed sale of the Real Property or a report of the current use
18 and condition of the Real Property. On or about January 16, 2006,
19 Mr. Hitt responded by letter, asserting that the membership of the
20 Vista Grange had decided to sell the Real Property because there was
21 no one available to maintain it. Thereafter, the California State
22 Grange informed the Vista Grange that it would not approve the sale
23 of the Real Property because the presence of Grange Halls played an
24 important role in the furtherance of the purposes of the Order, but
25 offered to provide the Vista Grange with low interest loans and
26 other assistance to repair and maintain the Real Property.

27 ///

28 ///

1 21. Unbeknownst to the California State Grange, in or
2 about November 2005, Mr. Hitt, as Master of the Vista Grange,
3 entered into a real estate listing agreement with M&H Seaside
4 Properties Inc. ("Seaside"); the California State Grange is informed
5 and believes, and on that basis alleges, that Mr. McCracken was at
6 the time a principal of Seaside. The California State Grange is
7 informed and believes, and on that basis alleges, that pursuant to
8 the listing agreement Seaside agreed to market the Real Property for
9 sale and the Vista Grange agreed to pay Seaside a commission in the
10 event that the Real Property was sold.

11 22. In or about December 2005, Mr. Hitt, as Master of the
12 Vista Grange, entered into a binding contract to sell the Real
13 Property, and thereafter took steps (including executing escrow
14 instructions) to consummate the sale of the Real Property, which
15 sale was scheduled to close on or before March 6, 2006. Shortly
16 before closing, the California State Grange learned that,
17 notwithstanding the fact that it had not approved the sale of the
18 Real Property, the Vista Grange was under contract and in escrow for
19 such a sale. The California State Grange promptly informed the
20 parties to the proposed transaction that under applicable Grange Law
21 the California State Grange was required to approve any sale of the
22 Real Property and that such approval had not been granted. As a
23 result, the contract for sale of the Real Property was canceled by
24 the parties thereto and the Real Property was not sold.

25 23. On or about February 24, 2007, a complaint against
26 Mr. Hitt was filed with the Master of the California State Grange
27 alleging that he had violated Grange Law by attempting to sell the
28 ///

1 Real Property without the prior written consent of the California
2 State Grange. On June 15, 2007, a Grange Trial Court was convened
3 and heard evidence on the complaint, and found Mr. Hitt guilty of
4 failing to uphold the Constitution and By-Laws of the National
5 Grange and the California State Grange by attempting to sell the
6 Real Property without the prior written consent of the California
7 State Grange. As a result of his conviction, Mr. Hitt was "removed
8 from his current office as Master of the Vista Grange."

9 24. On June 24, 2007, Mr. Hitt appealed his conviction to
10 the Master of the California State Grange. On August 1, 2007, the
11 Master of the California State Grange affirmed Mr. Hitt's
12 conviction, and the punishment imposed by the Grange Trial Court,
13 including Mr. Hitt's immediate removal as Master of the Vista
14 Grange. Pursuant to the By-Laws of the National Grange, the
15 decision of the Master of the California State Grange was final.

16 25. Unbeknownst to the California State Grange, on or
17 about July 21, 2007, during the pendency of his appeal, Mr. Hitt,
18 purporting to act as Master of the Vista Grange, entered into a
19 five-year lease of the Real Property without seeking or obtaining
20 the consent of the California State Grange as required by the
21 Constitution and By-Laws of the National Grange and the California
22 State Grange. On or about October 24, 2007, the California State
23 Grange, having learned of Mr. Hitt's action, requested a copy of the
24 lease from Mr. Hitt, informing him that the approval of the
25 California State Grange was required prior to entering into the
26 lease. Mr. Hitt refused to provide the California State Grange with
27 a copy of the lease and instructed his tenant not to provide the
28 California State Grange with any information regarding the lease.

1 26. Accordingly, on or about November 10, 2007, the
2 Master of the California State Grange suspended the charter of the
3 Vista Grange on the grounds that it was "working in violation of the
4 law and usages of the Order." The California State Grange stated
5 that the suspension would not be lifted until it had completed a
6 "complete and thorough audit of the financial and fraternal
7 operations" of the Vista Grange to determine if "a viable nucleus of
8 individuals is in place to carry out the purposes of the [O]rder."

9 27. Thereafter, in separate actions the National Grange
10 confirmed Mr. Hitt's conviction and removal as Master of the Vista
11 Grange and advised the California State Grange that it had the
12 authority to require an audit of the Vista Grange in order to
13 determine whether it was acting in violation of the laws of the
14 Order. On or about September 23, 2008, the California State Grange
15 proposed dates certain for the audit of the Vista Grange, which
16 audit would be conducted by a member of the Executive Committee of
17 the Oregon State Grange to ensure the impartiality of the audit.
18 The Vista Grange did not respond to the California State Grange's
19 proposal, except through counsel who stated that the dates suggested
20 for the audit conflicted with other obligations of his practice.

21 28. On December 16, 2008, the California State Grange
22 advised the Vista Grange that unless satisfactory arrangements for
23 the audit were completed by January 9, 2009, the California State
24 Grange would proceed on the assumption that the Vista Grange would
25 not cooperate with the audit. When the deadline passed without
26 response from the Vista Grange, the California State Grange revoked
27 the charter of the Vista Grange; a true and correct copy of

28 ///

1 the January 21, 2009 revocation letter from the California State
2 Grange is attached hereto as Exhibit B.

3 29. On or about February 11, 2009, the Vista Grange,
4 through counsel, informed the California State Grange that the Vista
5 Grange purportedly "changed its name to 'Agricultural Association of
6 Vista' and severed all relation with the state and national Grange
7 organization, amending its articles and bylaws accordingly;" a true
8 and correct copy of the February 11, 2009 letter from counsel for
9 the Vista Grange is attached hereto as Exhibit C. On investigation
10 the California State Grange learned that on or about January 7,
11 2009, Mr. Hitt, purporting to act as Master of the Vista Grange,
12 executed Amended and Restated Articles of Incorporation which
13 purported to change the name of Vista Grange to Agricultural
14 Association of Vista and to delete all reference to its obligations
15 to act in conformity with the Constitution, By-Laws and Grange Laws
16 of the National Grange and the California State Grange. The
17 California State Grange is informed and believes, and on that basis
18 alleges, that on or about the same date the Vista Grange purported
19 to amend its By-Laws to eliminate all reference to its obligations
20 to act in conformity with Constitution, By-Laws and Grange Laws of
21 the National Grange and California State Grange. The Vista Grange
22 did not seek or obtain the consent of the California State Grange to
23 the amendments of its Articles of Incorporation or By-Laws.

24 30. On or about January 28, 2009, Mr. Hitt, purporting to
25 act on behalf of the Vista Grange, executed and recorded a Grant
26 Deed transferring the Real Property from the Vista Grange to the
27 Agricultural Association of Vista, stating that the purpose of the
28 deed was a "change of corporation name only".

1 FIRST CAUSE OF ACTION

2 (Quiet Title Against All Defendants)

3 31. The California State Grange realleges and
4 incorporates by this reference the allegations of paragraphs 3
5 through 30, inclusive, of this complaint.

6 32. By virtue of the foregoing, the purported amendments
7 to the Articles of Incorporation and By-laws of the Vista Grange
8 were ultra vires, and of no force and effect.

9 33. Pursuant to the By-Laws of the National Grange, the
10 By-Laws of the Vista Grange, California Corporations Code § 9913(a)
11 and California General Nonprofit Corporation Law § 9802, as in
12 effect on December 31, 1979, upon the revocation of the charter of
13 the Vista Grange by the California State Grange, the Vista Grange
14 was required to dissolve, make provision for payment of its
15 liabilities, and thereafter transfer the Real Property and Personal
16 Property to the California State Grange to be held for the purposes
17 of the Order.

18 34. To date Defendants, including the Vista Grange, have
19 failed and refused to transfer the Real Property and Personal
20 Property to the California State Grange, and instead wrongfully
21 assert that they hold all right, title and interest in and to the
22 Real Property and the Personal Property.

23 35. The California State Grange seeks to quiet title to
24 the Real Property and the Personal Property against the claims of
25 Defendants, including the Vista Grange, who have no right, title or
26 interest in and to the Real Property or the Personal Property; the
27 California State Grange holds all right, title and interest in and

28 ///

1 to the Real Property and the Personal Property, free and clear of
2 any claims of Defendants, including the Vista Grange.

3 **SECOND CAUSE OF ACTION**

4 (Claim and Delivery Against All Defendants)

5 36. The California State Grange realleges and
6 incorporates by this reference the allegations of paragraphs 3
7 through 30 and 32 through 35, inclusive, of this complaint.

8 37. By virtue of the foregoing, Defendants, including the
9 Vista Grange, are required to transfer the Personal Property to the
10 California State Grange. The continued possession of the Personal
11 Property by Defendants, including the Vista Grange, and their
12 claimed right to use the Personal Property other than for the
13 purposes of the Order is in violation of the right of the California
14 State Grange to immediate and exclusive possession of the Personal
15 Property. In wrongfully withholding and detaining the Personal
16 Property, the conduct of the Defendants, including the Vista Grange,
17 was willful and was intended to cause injury to the California State
18 Grange, which is therefore entitled to an award of exemplary or
19 punitive damages.

20 **THIRD CAUSE OF ACTION**

21 (Conversion Against All Defendants)

22 38. The California State Grange realleges and
23 incorporates by this reference the allegations of paragraphs 3
24 through 30, 32 through 35 and 37, inclusive, of this complaint.

25 39. By virtue of the foregoing, the California State
26 Grange is entitled to possession of the Personal Property.

27 40. Notwithstanding the right of the California State
28 Grange to possession of the Personal Property, Defendants, including

1 the Vista Grange, have retained possession of the Personal Property
2 and are utilizing such property for their own benefit, and not for
3 the purposes of the Order.

4 41. In doing so, Defendants, including the Vista Grange,
5 converted the Personal Property to their own use and benefit, all to
6 the damage of the California State Grange in an amount to be proven
7 at trial. The acts of the Defendants, including the Vista Grange,
8 alleged above were willful, wanton, malicious and oppressive, and
9 were undertaken with the intent to defraud, and justify an award of
10 exemplary or punitive damages.

11 **FOURTH CAUSE OF ACTION**

12 (Constructive Trust Against All Defendants)

13 42. Plaintiff realleges and incorporates by this
14 reference the allegations of paragraphs 3 through 30, 32 through 35
15 and 39 through 40, inclusive, of this complaint.

16 43. At all times relevant, Defendants, including the
17 Vista Grange, have held the Real Property and the Personal Property
18 in trust for use for the purposes of the Order. Because the members
19 of the Vista Grange allegedly disaffiliated from the Order, and
20 because the California State Grange revoked the charter of the Vista
21 Grange, applicable Grange Law and California law require that the
22 Real Property and the Personal Property be transferred to the
23 California State Grange for use for the purposes of the Order.

24 44. Until such time as Defendants, including the Vista
25 Grange, transfer the Real Property and the Personal Property to the
26 California State Grange, Defendants, including the Vista Grange,
27 hold such property in constructive trust for the benefit of the
28 California State Grange for use for the purposes of the Order.

1 **FIFTH CAUSE OF ACTION**

2 (Declaratory Relief Against All Defendants)

3 45. Plaintiff realleges and incorporates by this
4 reference the allegations of paragraphs 3 through 30, 32 through 35,
5 39 through 40 and 43 through 44, inclusive, of this complaint.

6 46. A dispute has arisen between the California State
7 Grange, on the one hand, and Defendants, including the Vista Grange,
8 on the other hand, regarding the obligation of Defendants, including
9 the Vista Grange, to transfer possession of the Real Property and
10 Personal Property to the California State Grange. The California
11 State Grange contends that the attempt of the Vista Grange to amend
12 its Articles of Incorporation and By-Laws was ultra vires, and of no
13 force and effect, and that the alleged decision of the members of
14 the Vista Grange to disaffiliate from the Order and the decision of
15 the California State Grange to revoke the charter of the Vista
16 Grange require the Vista Grange to dissolve and transfer the Real
17 Property and the Personal Property to the California State Grange.
18 The California State Grange is informed and believes, and on that
19 basis alleges, that Defendants, including the Vista Grange, dispute
20 these contentions of the California State Grange.

21 47. The California State Grange seeks a declaration from
22 the Court that the attempt of the Vista Grange to amend its Articles
23 of Incorporation and By-Laws was ultra vires, and of no force and
24 effect, and that the Vista Grange is required to transfer the Real
25 Property and the Personal Property to the California State Grange
26 forthwith.

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1 3. That Defendants, including the Vista Grange, be
2 ordered to transfer possession of the Personal Property to the
3 California State Grange;

4 4. For an order declaring that Defendants, including the
5 Vista Grange, hold the Real Property and the Personal Property in
6 constructive trust for the benefit of the California State Grange
7 until such time as such property is transferred to the California
8 State Grange;

9 5. For a declaration of the respective rights and duties
10 of the parties hereto;

11 6. For an order dissolving the Vista Grange as a
12 California nonprofit corporation, and directing the Vista Grange to
13 wind up its affairs and transfer the Real Property and the Personal
14 Property to the California State Grange;

15 7. For general and special damages in an amount to be
16 proven at trial;

17 8. For exemplary and punitive damages in an amount to be
18 proven at trial;

19 9. For costs of suit herein; and

20 10. For such other and further relief as the Court may
21 deem just and proper.

22 Dated: March 23, 2009

SMITH, SILBAR & PARKER, LLP

23
24 By: Keith M. Parker
25 Keith M. Parker
26 Attorneys for the CALIFORNIA STATE
27 GRANGE
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I have read the foregoing **COMPLAINT FOR: 1) QUIET TITLE, 2) CLAIM AND DELIVERY, 3) CONVERSION, 4) CONSTRUCTIVE TRUST, 5) DECLARATORY RELIEF, 6) DISSOLUTION OF CORPORATION** and know its contents.

I am the Master of the California State Grange, a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. The matters stated therein are true of my own knowledge except as to those matters alleged on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 20, 2009 at SACRAMENTO,
California.


Randall Lewis

Exhibit GG

1 Mark E. Ellis - 127159
William A. Lapcevic - 238893
2 Amanda N. Griffith - 288164
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Sacramento, CA 95825
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Fax: (916) 283-8821
5

6 Attorneys for
DEFENDANT/CROSS COMPLAINANT ROBERT McFARLAND
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SACRAMENTO
10

11 THE NATIONAL GRANGE OF THE ORDER
OF PATRONS OF HUSBANDRY, a
12 Washington, D.C., nonprofit corporation,

13 Plaintiff,

14 And

15 THE CALIFORNIA STATE GRANGE, a
California nonprofit corporation, and
16 ED KOMSKI

17 Plaintiffs-in-Intervention
18

v.

19 THE CALIFORNIA STATE GRANGE, a
California nonprofit corporation, and ROBERT
20 MCFARLAND, JOHN LUYAAS, GERALD
CHERNOFF, and DAMINA PARR,
21

22 Defendants.
23

24 AND RELATED CROSS ACTIONS
25

Case No.: 34-2012-00130439

**ROBERT McFARLAND'S RESPONSES TO
PLAINTIFFS-IN-INTERVENTION'S
SPECIAL INTERROGATORIES, SET ONE**

*Complaint Filed: October 1, 2012
Trial Date: TBD*

26 PROPOUNDING PARTY: PLAINTIFFS-IN-INTERVENTION THE CALIFORNIA STATE
GRANGE AND ED KOMSKI

27 RESPONDING PARTY: DEFENDANT/CROSS-COMPLAINANT ROBERT McFARLAND

28 SET NUMBER: ONE

1 It should be noted that this responding party has not fully completed his investigation of the
2 facts relating to this case, has not fully completed his discovery in this action, and has not completed
3 his preparation for the trial. All the answers contained herein are based upon such information and
4 documents which are presently available and specifically known to this responding party and disclose
5 only those contentions which presently occur to such responding party. It is anticipated that further
6 discovery, independent investigation, legal research and analysis will supply additional facts, add
7 meaning to the known facts, as well as establish entirely new factual conclusions and legal contentions,
8 all of which may lead to substantial additions, changes in and variations from the contentions herein
9 set forth. The following responses are given without prejudice to responding party's right to produce
10 evidence of any subsequently discovered fact or facts which this responding party may later recall.
11 Responding party accordingly reserves the right to change any and all answers herein as additional
12 facts are ascertained, analyses are made, legal research is completed and contentions are made.

13 **SPECIAL INTERROGATORIES**

14 **SPECIAL INTERROGATORY NO. 1:**

15 IDENTIFY all Bylaws or other rules applicable to the CALIFORNIA STATE GRANGE on the
16 following dates: (a) January 1, 2012; (b) September 16, 2012; (c) January 1, 2013; (d) April 4, 2013;
17 (e) October 1, 2013; and (f) December 31, 2013.

18 For the purposes of these Interrogatories, the term "IDENTIFY," when used in reference to a
19 DOCUMENTS, shall mean to describe the DOCUMENTS, its author(s), recipient(s), and date
20 prepared. Alternatively, if the responsive DOCUMENTS has been produced and Bates-stamped,
21 "IDENTIFY" shall mean to state the Bates-number(s) of the DOCUMENTS(S).

22 For the purposes of these Interrogatories, the term "DOCUMENTS" or "DOCUMENTS" shall
23 mean all writings as defined by California Evidence Code section 250, as well as any other kind of
24 printed, recorded, written, graphic, or photographic matter (including tape recordings, either audio or
25 video) as well as any information maintained by electronic data processing systems, including all non-
26 identical copies of such information, and any electronically stored information such as e-mails and the
27 like.

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1 For the purposes of these Interrogatories, the term "CALIFORNIA STATE GRANGE" shall
2 refer to the division of the National Grange chartered by the National Grange in 1873, including the
3 California non-profit corporation called "California State Grange" incorporated in 1946 and the
4 California non-profit corporation called "California Grange Foundation" incorporated in 1992.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

6 Responding Party objects that the interrogatory contains subparts and is compound,
7 conjunctive, and/or disjunctive. Responding Party objects that the interrogatory is overbroad, vague
8 and ambiguous with respect to the definitions of the terms "author(s)" and "recipient(s)" within the
9 definition of the term "IDENTIFY," and the definition of the term "CALIFORNIA STATE
10 GRANGE." Both Responding Party and Propounding Party claim to fall within the definition of
11 CALIFORNIA STATE GRANGE. In addition, "CALIFORNIA STATE GRANGE" is compound,
12 conjunctive, and/or disjunctive as defined. The term "Bylaws or other applicable rules" are vague and
13 ambiguous as well as overbroad. The term "applicable to" in this context is vague and ambiguous.
14 Responding Party further objects to the interrogatory to the extent it seeks information protected by the
15 attorney-client privilege and/or the attorney work product doctrine. Responding party further objects
16 that the interrogatory includes information protected by the attorney client privilege and/or attorney
17 client work product doctrine. Furthermore, discovery is ongoing and responding party reserves his
18 right to amend should more information become available.

19 **SPECIAL INTERROGATORY NO. 2:**

20 State the date(s) that YOU (a) ceased to be a member of the Order of Patrons of Husbandry;
21 (b) ceased to be affiliated with the Order of Patrons of Husbandry; and (c) ceased to be a member of
22 any organization affiliated with the National Grange of the Order of Patrons of Husbandry.

23 For the purposes of these Interrogatories, the terms "YOU" and "YOUR" shall mean Defendant
24 Robert McFarland, his attorneys, his present and former, agents, and anyone acting on his behalf.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

26 Responding Party objects that the interrogatory contains subparts and is compound,
27 conjunctive, and/or disjunctive. Responding Party objects that the definition of "You" is compound.
28 Responding party further objects that the interrogatory includes information protected by the attorney

1 client privilege and/or attorney client work product doctrine. Furthermore, discovery is ongoing and
2 responding party reserves his right to amend should more information become available.

3 Without waiving said objections, Responding Party responds as follows: The Responding Party
4 did not "cease" to be a member of the National Grange. The Responding Party was kicked out the
5 National Grange on April 5, 2013 when the National Grange revoked the California State Grange's
6 charter.

7 **SPECIAL INTERROGATORY NO. 3:**

8 IDENTIFY all NATIONAL SESSIONS of the National Grange to which the CALIFORNIA
9 STATE GRANGE sent a representative since 1873.

10 For the purposes of these Interrogatories, the term "NATIONAL SESSION" shall refer to the
11 annual meeting or "convention" of the National Grange.

12 For purposes of these Interrogatories, the term "IDENTIFY" with respect to a date shall mean
13 to state the year and to specify a range of dates, if applicable.

14 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

15 Responding Party objects that the interrogatory contains subparts and is compound,
16 conjunctive, and/or disjunctive. Responding Party objects that the interrogatory is overbroad, vague
17 and ambiguous with respect to the definition of the term "CALIFORNIA STATE GRANGE." Both
18 Responding Party and Propounding Party claim to fall within the definition of CALIFORNIA STATE
19 GRANGE. In addition, "CALIFORNIA STATE GRANGE" is compound, conjunctive, and/or
20 disjunctive as defined. Responding Party further objects that the interrogatory is vastly overbroad and
21 unduly burdensome as to time period and seeks information that is not relevant or likely to lead to the
22 discovery of admissible evidence. Responding party further objects that the interrogatory includes
23 information protected by the attorney client privilege and/or attorney client work product doctrine.
24 Furthermore, discovery is ongoing and responding party reserves his right to amend should more
25 information become available.

26 Without waiving said objections, the Responding Party responds as follows: It is the
27 Responding Party understands that the California State Grange has sent representatives to the
28 National Grange convention for almost every year leading up to the suspension and then revocation of

1 the California State Grange's charter.

2 **SPECIAL INTERROGATORY NO. 4:**

3 IDENTIFY all real property acquired, owned, or held by the CALIFORNIA STATE GRANGE
4 since its formation in 1873.

5 For purposes of these Interrogatories, the term "IDENTIFY" with respect to real property shall
6 mean to state the physical address of the property, the date of its acquisition, the date of its sale (if
7 any), the name in which title was and/or is held, the amount of the mortgage on the property (if any),
8 and date the property was mortgaged (if it was).

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

10 Responding Party objects that the interrogatory seeks information that is confidential and
11 protected by the right to privacy in Article I, section 1 of the California Constitution. Responding
12 Party objects that the interrogatory contains subparts and is compound, conjunctive, and/or
13 disjunctive. Responding Part objects in that the interrogatory impermissibly seeks financial condition
14 discovery. Responding Party objects that the interrogatory is overbroad, vague and ambiguous with
15 respect to the definition of the term "CALIFORNIA STATE GRANGE." Both Responding Party and
16 Propounding Party claim to fall within the definition of CALIFORNIA STATE GRANGE. In
17 addition, "CALIFORNIA STATE GRANGE" is compound, conjunctive, and/or disjunctive as
18 defined. Responding Party further objects that the interrogatory is vastly overbroad and unduly
19 burdensome as to time period and seeks information that is not relevant nor likely to lead to the
20 discovery of admissible evidence. Responding party further objects that the interrogatory includes
21 information protected by the attorney client privilege and/or attorney client work product doctrine.
22 Furthermore, discovery is ongoing and responding party reserves his right to amend should more
23 information become available.

24 Without waiving said objections, the Responding Party responds as follows: The Responding
25 Party does not know cannot identify all real property acquired, owned, or held by the California State
26 Grange.

27 **SPECIAL INTERROGATORY NO. 5:**

28 IDENTIFY all financial accounts, including but not limited to bank accounts, brokerage

1 accounts, trust accounts, and mutual funds, held by the CALIFORNIA STATE GRANGE on January
2 1, 2012.

3 For purposes of these Interrogatories, the term "IDENTIFY" with respect to financial accounts
4 shall mean to state the financial institution at which the account is held, the name of the account
5 holder, the account number, the names of all individuals entitled to deposit to or transfer or withdraw
6 funds from the account, the account balance as of January 1, 2012, the current status of the account,
7 and the account balance stated in the most recent statement of account.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

9 Responding Party objects that the interrogatory seeks information that is confidential and
10 protected by the right to privacy in Article I, section 1 of the California Constitution. Responding
11 Part objects in that the interrogatory impermissibly seeks financial condition discovery. Responding
12 Party objects that the interrogatory contains subparts and is compound, conjunctive, and/or
13 disjunctive. Responding Party objects that the interrogatory is overbroad, vague and ambiguous with
14 respect to the definition of the term "CALIFORNIA STATE GRANGE." Both Responding Party and
15 Propounding Party claim to fall within the definition of CALIFORNIA STATE GRANGE. In
16 addition, "CALIFORNIA STATE GRANGE" is compound, conjunctive, and/or disjunctive as
17 defined. Responding Party further objects that the interrogatory seeks information that is not relevant
18 or likely to lead to the discovery of admissible evidence. Responding party further objects that the
19 interrogatory includes information protected by the attorney client privilege and/or attorney client
20 work product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to
21 amend should more information become available.

22 Moreover, the Responding Party will not produce such information until a there is an executed
23 confidentiality agreement between the parties or a protective order has been granted by the court.

24 **SPECIAL INTERROGATORY NO. 6:**

25 IDENTIFY all real and personal property of the CALIFORNIA STATE GRANGE that YOU
26 contend was not donated to be used for the general purposes of the Order of Patrons of Husbandry.

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

28 Responding Party objects that the interrogatory seeks information that is confidential and

1 protected by the right to privacy in Article I, section 1 of the California Constitution. Responding Part
2 objects in that the interrogatory impermissibly seeks financial condition discovery. Responding Party
3 objects that the interrogatory contains subparts and is compound, conjunctive, and/or disjunctive.
4 Responding Party objects that the interrogatory is overbroad, confusing, vague and ambiguous with
5 respect to the phrase "was not donated to be used for the general purposes of the Order of Patrons of
6 Husbandry." Responding Party objects that the interrogatory is overbroad, vague and ambiguous with
7 respect to the definition of the term "CALIFORNIA STATE GRANGE." Both Responding Party and
8 Propounding Party claim to fall within the definition of CALIFORNIA STATE GRANGE. In
9 addition, "CALIFORNIA STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined.
10 Responding Party objects that the interrogatory may be unduly burdensome. Responding Party objects
11 to the interrogatory to the extent it seeks information protected by the attorney/client privilege, the
12 attorney work product doctrine, and/or or requires Responding Party to draw legal conclusions.
13 Responding party further objects that the interrogatory includes information protected by the attorney
14 client privilege and/or attorney client work product doctrine. Furthermore, discovery is ongoing and
15 responding party reserves his right to amend should more information become available.

16 Without waiving said objections, the Responding Party responds as follows: The Responding
17 Party does not have personal knowledge of any real or personal property that was specifically donated
18 to be used for the general purpose of the Order of Patrons of Husbandry. Any donations received were
19 made to the California State Grange.

20 Dated: January 16, 2015

21 ELLIS LAW GROUP, LLP

22 By 

23 William A. Lapcevic

24 Attorney for DEFENDANT/CROSS COMPLAINANT
25 ROBERT McFARLAND
26
27
28

1 I am a party in this action.

2 I have read the foregoing ROBERT McFARLAND'S RESPONSES TO PLAINTIFFS-IN-
3 INTERVENTION SPECIAL INTERROGATORIES, SET ONE and the same is true of my own
4 knowledge, except as to those matters which are therein stated on information and belief, and as to
5 those matters, I believe them to be true.

6 I declare under penalty of perjury under the laws of the State of California that the foregoing is
7 a true and correct statement.

8 Executed this 16th day of January, 2015, at ROSONUC, California.

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Robert McFarland

CERTIFICATE OF SERVICE

I, Karen Gould, declare:

I am a citizen of the United States, am over the age of eighteen years, and am not a party to or interested in the within entitled cause. My business address is 740 University Avenue, Suite 100, Sacramento, CA 95825.

On the date below, I served the following document on the parties in the within action:

ROBERT McFARLAND'S RESPONSES TO PLAINTIFFS-IN-INTERVENTION'S
SPECIAL INTERROGATORIES, SET ONE

| | |
|---|--|
| X | BY MAIL: I am familiar with the business practice for collection and processing of mail. The above-described document(s) will be enclosed in a sealed envelope, with first class postage thereon fully prepaid, and deposited with the United States Postal Service at Sacramento, CA on this date, addressed as follows: |
| | VIA OVERNIGHT SERVICE: The above-described document(s) will be delivered by overnight service, to the following: |

| | |
|--|--|
| Martin Jensen Thomas Riordan PORTER SCOTT 350 University Avenue, Suite 200 Sacramento, CA 95825 | Attorneys for Attorneys for Plaintiff and Cross-Defendants The National Grange of the Order of Patrons of Husbandry and Edward L. Luttrell |
| Robert Swanson Daniel Stouder BOUTIN JONES, INC. 555 Capitol Mall, Suite 1500 Sacramento, CA 95814 | Attorneys for Defendants and Cross-Complainants The California State Grange, Jon Luvaas, Gerald Chernoff, Damian Parr, Takashi Yogi, Kathy Bergeron, and Bill Thomas |
| Michael A. Farbstein FARBSTEIN & BLACKMAN 411 Borel Avenue, Suite 425 San Mateo, CA 94402 | Attorneys for Cross-Defendants Martha Stefenoni and MARTHA STEFENONI |
| Jeff Skinner SCHIFF HARDIN 901 K Street NW, Suite 700 Washington, DC 20001 | Attorneys for The Grange of the State of California's Order of Patrons of Husbandry, Chartered and Ed Komski |

I declare under penalty of perjury that the foregoing is true and correct. Executed at
Sacramento, California on January 16, 2015.

By Karen Gould
Karen Gould, CCLS

PROOF OF SERVICE

Exhibit HH

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William A. Lapcevic - 238893
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6 Attorneys for
DEFENDANT/CROSS COMPLAINANT ROBERT McFARLAND
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SACRAMENTO
10

11 THE NATIONAL GRANGE OF THE ORDER
OF PATRONS OF HUSBANDRY, a-
12 Washington, D.C., nonprofit corporation,

13 Plaintiff,

14 And

15 THE CALIFORNIA STATE GRANGE, a
California nonprofit corporation, and
16 ED KOMSKI

17 Plaintiffs-in-Intervention
18

19 v.

20 THE CALIFORNIA STATE GRANGE, a
California nonprofit corporation, and ROBERT
MCFARLAND, JOHN LUVAAS, GERALD
CHERNOFF, and DAMINA PARR,
21

22 Defendants.
23

24 AND RELATED CROSS ACTIONS
25

Case No.: 34-2012-00130439

**ROBERT McFARLAND'S RESPONSES TO
PLAINTIFFS-IN-INTERVENTION'S
REQUESTS FOR ADMISSION, SET ONE**

Complaint Filed: October 1, 2012
Trial Date: TBD

26 PROPOUNDING PARTY: PLAINTIFFS-IN-INTERVENTION THE CALIFORNIA STATE
GRANGE AND ED KOMSKI

27 RESPONDING PARTY: DEFENDANT/CROSS-COMPLAINANT ROBERT McFARLAND

28 SET NUMBER: ONE

1 It should be noted that this responding party has not fully completed his investigation of the
2 facts relating to this case, has not fully completed his discovery in this action, and has not completed
3 his preparation for the trial. All the answers contained herein are based upon such information and
4 documents which are presently available and specifically known to this responding party and disclose
5 only those contentions which presently occur to such responding party. It is anticipated that further
6 discovery, independent investigation, legal research and analysis will supply additional facts, add
7 meaning to the known facts, as well as establish entirely new factual conclusions and legal contentions,
8 all of which may lead to substantial additions, changes in and variations from the contentions herein
9 set forth. The following responses are given without prejudice to responding party's right to produce
10 evidence of any subsequently discovered fact or facts which this responding party may later recall.
11 Responding party accordingly reserves the right to change any and all answers herein as additional
12 facts are ascertained, analyses are made, legal research is completed and contentions are made.

13 GENERAL OBJECTIONS

14 Robert McFarland ("Responding Party") objects to the requests and to each individual request
15 on the following grounds:

16 1. The Responding Party objects to each request to the extent that it seeks to impose upon
17 the Responding Party an obligation to respond greater than that required by Code of Civil Procedure §
18 2033.010 et seq.

19 2. Responding Party objects to each request to the extent that it seeks information
20 protected by the attorney-client privilege and/or the attorney work product doctrine, including, but
21 not limited to, the joint defense privilege.

22 3. The Responding Party objects to each request to the extent that it seeks information
23 that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

24 4. Responding Party objects to each request to the extent it is vague, ambiguous,
25 confusing, overbroad, contains subparts, and/or is compound, conjunctive and/or disjunctive.

26 5. Responding Party objects to each request to the extent that responding would be
27 oppressive and/or unduly burdensome.

28

6. These responses are made solely for the purpose of this action. Each response is subject to all appropriate objections that would require the exclusion of any statement contained in any response if the request was made or if the response was given by a witness present and testifying in court. All objections are reserved and may be interposed at the time of trial.

7. The Responding Party has not yet completed investigation of the facts relating to this action, discovery in this action, nor preparation for trial in this action. Consequently, the following responses to individual requests are based on information presently available to the Responding Party and are given without prejudice to the right of the Responding Party to produce at the time of trial any and all subsequently discovered evidence relating to the proof of presently known material facts, and to produce all evidence, whenever discovered, relating to the proof of subsequently discovered material facts.

8. The fact that the Responding Party has responded to part or all of any specific request is not intended and shall not be construed to be a waiver by the Responding Party of all or any part of any objection to any specific request.

REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1:

Admit that YOU are not a member of the Order of Patrons of Husbandry.

For the purposes of these Requests for Admission, the terms “YOU” and “YOUR” shall mean Defendant Robert McFarland, his attorneys, his present and former agents, and anyone acting on his behalf.

RESPONSE TO REQUEST FOR ADMISSION NO. 1:

Responding Party objects that the request is vague and ambiguous as to time period and as to the phrase “member of the Order of Patrons of Husbandry.” Responding party further objects that the request includes information protected by the attorney client privilege and/or attorney client work product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend should more information become available.

Without waiving said objections, Responding Party responds as follows: Admit.

1 **REQUEST FOR ADMISSION NO. 2:**

2 Admit that YOU are not a member of any organization affiliated with the Order of Patrons of
3 Husbandry.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

5 Responding Party objects that the request is vague and ambiguous as to time period and as to
6 the terms "member" and "affiliated with." Responding party further objects that the request includes
7 information protected by the attorney client privilege and/or attorney client work product doctrine.
8 Furthermore, discovery is ongoing and responding party reserves his right to amend should more
9 information become available.

10 Without waiving said objections, Responding Party admits as follows: Admit.

11 **REQUEST FOR ADMISSION NO. 3:**

12 Admit that YOU are not a member of any organization affiliated with the National Grange of
13 the Order of Patrons of Husbandry.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

15 Responding Party objects that the request is vague and ambiguous as to time period and as to
16 the terms "member" and "affiliated with." Responding party further objects that the request includes
17 information protected by the attorney client privilege and/or attorney client work product doctrine.
18 Furthermore, discovery is ongoing and responding party reserves his right to amend should more
19 information become available.

20 Without waiving said objections, Responding Party admits as follows: Admit.

21 **REQUEST FOR ADMISSION NO. 4:**

22 Admit that YOU hold yourself out as the President of the "California State Grange."

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

24 Responding Party objects that the request is vague and ambiguous as to the phrase "hold
25 yourself out as." Additionally, Responding Party objects as the request is overbroad. Responding
26 party further objects that the request includes information protected by the attorney client privilege
27 and/or attorney client work product doctrine. Furthermore, discovery is ongoing and responding party
28 reserves his right to amend should more information become available.

1 Without waiving said objections, Responding Party admits as follows: Admit.

2 **REQUEST FOR ADMISSION NO. 5:**

3 Admit that the CALIFORNIA STATE GRANGE acquired real property prior to April 5, 2013.

4 For the purposes of these Requests for Admission, the term "CALIFORNIA STATE
5 GRANGE" shall refer to the division of the National Grange chartered by the National Grange in
6 1873, including the California non-profit corporation called "California State Grange" incorporated in
7 1946 and the California non-profit corporation called "California Grange Foundation" incorporated in
8 1992.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

10 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
11 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
12 Intervention) claim to be the "California State Grange," and Responding Party does not know
13 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
14 is compound, conjunctive, and/or disjunctive as defined. Responding Party objects that the term
15 "acquired" is vague and ambiguous. Responding party further objects that the request includes
16 information protected by the attorney client privilege and/or attorney client work product doctrine.
17 Furthermore, discovery is ongoing and responding party reserves his right to amend should more
18 information become available.

19 Without waiving said objections, Responding Party admits as follows: Admit.

20 **REQUEST FOR ADMISSION NO. 6:**

21 Admit that the CALIFORNIA STATE GRANGE acquired personal property prior to April 5,
22 2013.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

24 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
25 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
26 Intervention) claim to be the "California State Grange," and Responding Party does not know
27 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
28 is compound, conjunctive, and/or disjunctive as defined. Responding Party objects that the term

1 "acquired" is vague and ambiguous. Responding party further objects that the request includes
2 information protected by the attorney client privilege and/or attorney client work product doctrine.
3 Furthermore, discovery is ongoing and responding party reserves his right to amend should more
4 information become available.

5 Without waiving said objections, Responding Party admits as follows: Admit.

6 **REQUEST FOR ADMISSION NO. 7:**

7 Admit that the CALIFORNIA STATE GRANGE received charitable monetary donations prior
8 to April 5, 2013.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

10 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
11 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
12 Intervention) claim to be the "California State Grange," and Responding Party does not know
13 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
14 is compound, conjunctive, and/or disjunctive as defined. Responding Party objects that the term
15 "charitable monetary donations" is vague and ambiguous. Responding party further objects that the
16 request includes information protected by the attorney client privilege and/or attorney client work
17 product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend
18 should more information become available. Overbroad.

19 Without waiving said objections, Responding Party admits as follows: Admit.

20 **REQUEST FOR ADMISSION NO. 8:**

21 Admit that the CALIFORNIA STATE GRANGE received charitable non-monetary donations
22 prior to April 5, 2013.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

24 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
25 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
26 Intervention) claim to be the "California State Grange," and Responding Party does not know
27 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
28 is compound, conjunctive, and/or disjunctive as defined. Responding Party objects that the term

1 "charitable non-monetary donations" is vague and ambiguous. Responding party further objects that
2 the request includes information protected by the attorney client privilege and/or attorney client work
3 product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend
4 should more information become available. Overbroad.

5 Without waiving said objections, Responding Party admits as follows: Admit.

6 **REQUEST FOR ADMISSION NO. 9:**

7 Admit that the CALIFORNIA STATE GRANGE acquired real property prior to 1946.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

9 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
10 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
11 Intervention) claim to be the "California State Grange," and Responding Party does not know
12 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
13 is compound, conjunctive, and/or disjunctive as defined. Responding Party objects that the term
14 "acquired" is vague and ambiguous. The request is overbroad. Responding party further objects that
15 the request includes information protected by the attorney client privilege and/or attorney client work
16 product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend
17 should more information become available.

18 Without waiving said objections, Responding Party responds: Responding Party is without
19 sufficient personal knowledge to admit or deny this request in whole.

20 **REQUEST FOR ADMISSION NO. 10:**

21 Admit that the CALIFORNIA STATE GRANGE acquired personal property prior to 1946.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

23 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
24 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
25 Intervention) claim to be the "California State Grange," and Responding Party does not know
26 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
27 is compound, conjunctive, and/or disjunctive as defined. Responding Party objects that the term
28 "acquired" is vague and ambiguous. The request is overbroad. Responding party further objects that

1 the request includes information protected by the attorney client privilege and/or attorney client work
2 product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend
3 should more information become available.

4 Without waiving said objections, Responding Party responds: Responding Party is without
5 sufficient personal knowledge to admit or deny this request in whole.

6 **REQUEST FOR ADMISSION NO. 11:**

7 Admit that the CALIFORNIA STATE GRANGE received charitable monetary donations prior
8 to 1946.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

10 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
11 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
12 Intervention) claim to be the "California State Grange," and Responding Party does not know
13 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
14 is compound, conjunctive, and/or disjunctive as defined. Responding Party objects that the term
15 "acquired" is vague and ambiguous. The request is overbroad. Responding party further objects that
16 the request includes information protected by the attorney client privilege and/or attorney client work
17 product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend
18 should more information become available.

19 Without waiving said objections, Responding Party responds: Responding Party is without
20 sufficient personal knowledge to admit or deny this request in whole.

21 **REQUEST FOR ADMISSION NO. 12:**

22 Admit that the CALIFORNIA STATE GRANGE received charitable non-monetary donations
23 prior to 1946.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

25 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
26 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
27 Intervention) claim to be the "California State Grange," and Responding Party does not know
28 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"

1 is compound, conjunctive, and/or disjunctive as defined. Responding Party objects that the term
2 "acquired" is vague and ambiguous. The request is overbroad. Responding party further objects that
3 the request includes information protected by the attorney client privilege and/or attorney client work
4 product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend
5 should more information become available.

6 Without waiving said objections, Responding Party responds: Responding Party is without
7 sufficient personal knowledge to admit or deny this request in whole.

8 **REQUEST FOR ADMISSION NO. 13:**

9 Admit that the CALIFORNIA STATE GRANGE was a chartered division of the National
10 Grange prior to April 5, 2013.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

12 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
13 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
14 Intervention) claim to be the "California State Grange," and Responding Party does not know
15 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
16 is compound, conjunctive, and/or disjunctive as defined. Responding Party objects that the term
17 "acquired" is vague and ambiguous. Overbroad. Responding party further objects that the request
18 includes information protected by the attorney client privilege and/or attorney client work product
19 doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend should
20 more information become available.

21 Without waiving said objections, the Responding Party responds: Deny.

22 **REQUEST FOR ADMISSION NO. 14:**

23 Admit that the CALIFORNIA STATE GRANGE was a chartered division of the National
24 Grange prior to September 17, 2012.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

26 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
27 vague and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-
28 in-Intervention) claim to be the "California State Grange," and Responding Party does not know

1 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
2 is compound, conjunctive, and/or disjunctive as defined. Responding Party objects that the term
3 "chartered division" is vague and ambiguous. Overbroad. Responding party further objects that the
4 request includes information protected by the attorney client privilege and/or attorney client work
5 product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend
6 should more information become available.

7 Without waiving said objections, the Responding Party responds: Deny.

8 **REQUEST FOR ADMISSION NO. 15:**

9 Admit that the CALIFORNIA STATE GRANGE was a chartered division of the National
10 Grange prior to January 1, 2012.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

12 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
13 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
14 Intervention) claim to be the "California State Grange," and Responding Party does not know
15 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
16 is compound, conjunctive, and/or disjunctive as defined. Responding Party objects that the term
17 "chartered division" is vague and ambiguous. Overbroad. Responding party further objects that the
18 request includes information protected by the attorney client privilege and/or attorney client work
19 product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend
20 should more information become available.

21 Without waiving said objections, the Responding Party responds: Deny.

22 **REQUEST FOR ADMISSION NO. 16:**

23 Admit that the CALIFORNIA STATE GRANGE was a chartered division of the National
24 Grange prior to 1946.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

26 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
27 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
28 Intervention) claim to be the "California State Grange," and Responding Party does not know

1 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
2 is compound, conjunctive, and/or disjunctive as defined. Responding Party objects that the term
3 "chartered division" is vague and ambiguous. Overbroad. Responding party further objects that the
4 request includes information protected by the attorney client privilege and/or attorney client work
5 product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend
6 should more information become available.

7 Without waiving said objections, the Responding Party responds: Deny.

8 **REQUEST FOR ADMISSION NO. 17:**

9 Admit that all donations received by the CALIFORNIA STATE GRANGE prior to April 5,
10 2013, were to be used for the general purposes of the Order of Patrons of Husbandry within the State
11 of California.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

13 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
14 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
15 Intervention) claim to be the "California State Grange," and Responding Party does not know
16 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
17 is compound, conjunctive, and/or disjunctive as defined. Responding Party further objects that the
18 phrase "were to be used for the general purposes of the Order of Patrons of Husbandry within the State
19 of California" is vague and ambiguous. Overbroad. Responding party further objects that the request
20 includes information protected by the attorney client privilege and/or attorney client work product
21 doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend should
22 more information become available.

23 Without waiving said objections, Responding Party responds: Responding Party is without
24 sufficient personal knowledge to admit or deny this request in whole.

25 **REQUEST FOR ADMISSION NO. 18:**

26 Admit that all donations received by the CALIFORNIA STATE GRANGE prior to September
27 17, 2012, were to be used for the general purposes of the Order of Patrons of Husbandry within the
28 State of California.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
3 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
4 Intervention) claim to be the "California State Grange," and Responding Party does not know
5 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
6 is compound, conjunctive, and/or disjunctive as defined. Responding Party further objects that the
7 phrase "were to be used for the general purposes of the Order of Patrons of Husbandry within the State
8 of California" is vague and ambiguous. Overbroad. Responding party further objects that the request
9 includes information protected by the attorney client privilege and/or attorney client work product
10 doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend should
11 more information become available.

12 Without waiving said objections, Responding Party responds: Responding Party is without
13 sufficient personal knowledge to admit or deny this request in whole.

14 **REQUEST FOR ADMISSION NO. 19:**

15 Admit that all donations received by the CALIFORNIA STATE GRANGE prior to January 1,
16 2012, were to be used for the general purposes of the Order of Patrons of Husbandry within the State
17 of California.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

19 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
20 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
21 Intervention) claim to be the "California State Grange," and Responding Party does not know
22 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
23 is compound, conjunctive, and/or disjunctive as defined. Responding Party further objects that the
24 phrase "were to be used for the general purposes of the Order of Patrons of Husbandry within the State
25 of California" is vague and ambiguous. Overbroad. Responding party further objects that the request
26 includes information protected by the attorney client privilege and/or attorney client work product
27 doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend should
28 more information become available.

1 Without waiving said objections, Responding Party responds: Responding Party is without
2 sufficient personal knowledge to admit or deny this request in whole.

3 **REQUEST FOR ADMISSION NO. 20:**

4 Admit that the organization YOU purport to be the "California State Grange" has collected
5 dues from Pomona, Subordinate, and Junior Granges in California since April 5, 2013.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

7 Responding Party objects that the phrase "has collected dues...since April 5, 2013" is vague
8 and ambiguous. Responding Party objects that the term "the organization YOU purport to be the
9 'California State Grange'" is vague, ambiguous, and unintelligible. Compound, conjunctive, and/or
10 disjunctive. Overbroad. Responding party further objects that the request includes information
11 protected by the attorney client privilege and/or attorney client work product doctrine. Furthermore,
12 discovery is ongoing and responding party reserves his right to amend should more information
13 become available.

14 Without waiving said objections, Responding Party responds: Admit as "California State
15 Grange, a California state corporation.

16 **REQUEST FOR ADMISSION NO. 21:**

17 Admit that the organization YOU purport to be the "California State Grange" has not paid any
18 dues to the National Grange since April 5, 2013.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

20 Responding Party objects that the term "the organization YOU purport to be the 'California
21 State Grange'" is vague, ambiguous, and unintelligible. Overbroad. Responding party further objects
22 that the request includes information protected by the attorney client privilege and/or attorney client
23 work product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to
24 amend should more information become available.

25 Without waiving said objections, Responding Party responds: Admit as "California State Grange, a
26 California state corporation

27 **REQUEST FOR ADMISSION NO. 22:**

28 Admit that the CALIFORNIA STATE GRANGE was formed in 1873.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
3 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
4 Intervention) claim to be the "California State Grange," and Responding Party does not know
5 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
6 is compound, conjunctive, and/or disjunctive as defined. Responding party further objects that the
7 request includes information protected by the attorney client privilege and/or attorney client work
8 product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend
9 should more information become available.

10 Without waiving said objections, the Responding Party responds: Admit.

11 **REQUEST FOR ADMISSION NO. 23:**

12 Admit that the National Grange issued a Charter to the CALIFORNIA STATE GRANGE in
13 1873.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

15 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
16 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
17 Intervention) claim to be the "California State Grange," and Responding Party does not know
18 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
19 is compound, conjunctive, and/or disjunctive as defined. Responding party further objects that the
20 request includes information protected by the attorney client privilege and/or attorney client work
21 product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend
22 should more information become available.

23 Without waiving said objections, the Responding Party responds: Admit.

24 **REQUEST FOR ADMISSION NO. 24:**

25 Admit that the National Grange suspended the Charter of the CALIFORNIA STATE
26 GRANGE on September 17, 2012.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

28 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague

1 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
2 Intervention) claim to be the "California State Grange," and Responding Party does not know
3 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
4 is compound, conjunctive, and/or disjunctive as defined. Responding party further objects that the
5 request includes information protected by the attorney client privilege and/or attorney client work
6 product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend
7 should more information become available.

8 Without waiving said objections, the Responding Party responds: Admit as to California State
9 Grange, a California state corporation.

10 **REQUEST FOR ADMISSION NO. 25:**

11 Admit that the National Grange revoked the Charter of the CALIFORNIA STATE GRANGE
12 on April 5, 2013.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

14 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
15 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
16 Intervention) claim to be the "California State Grange," and Responding Party does not know
17 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
18 is compound, conjunctive, and/or disjunctive as defined. Responding party further objects that the
19 request includes information protected by the attorney client privilege and/or attorney client work
20 product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend
21 should more information become available.

22 Without waiving said objections, the Responding Party responds: Admit as to California State
23 Grange, a California state corporation.

24 **REQUEST FOR ADMISSION NO. 26:**

25 Admit that the CALIFORNIA STATE GRANGE sent a representative to the NATIONAL
26 SESSION of the National Grange in 1986.

27 For the purposes of these Requests for Admission, the term "NATIONAL SESSION" shall
28 refer to the annual meeting or convention of the National Grange.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
3 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
4 Intervention) claim to be the "California State Grange," and Responding Party does not know
5 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
6 is compound, conjunctive, and/or disjunctive as defined. Overbroad. Responding party further objects
7 that the request includes information protected by the attorney client privilege and/or attorney client
8 work product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to
9 amend should more information become available.

10 Without waiving said objections, Responding Party responds: Responding Party is without
11 sufficient personal knowledge to admit or deny this request.

12 **REQUEST FOR ADMISSION NO. 27:**

13 Admit that the CALIFORNIA STATE GRANGE sent a representative to the NATIONAL
14 SESSION of the National Grange in 1996.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

16 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
17 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
18 Intervention) claim to be the "California State Grange," and Responding Party does not know
19 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
20 is compound, conjunctive, and/or disjunctive as defined. Overbroad. Responding party further objects
21 that the request includes information protected by the attorney client privilege and/or attorney client
22 work product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to
23 amend should more information become available.

24 Without waiving said objections, Responding Party responds: Responding Party is without
25 sufficient personal knowledge to admit or deny this request.

26 **REQUEST FOR ADMISSION NO. 28:**

27 Admit that the CALIFORNIA STATE GRANGE sent a representative to every NATIONAL
28 SESSION of the National Grange between 1874 and 2011.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
3 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
4 Intervention) claim to be the "California State Grange," and Responding Party does not know
5 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
6 is compound, conjunctive, and/or disjunctive as defined. Overbroad. Responding party further objects
7 that the request includes information protected by the attorney client privilege and/or attorney client
8 work product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to
9 amend should more information become available.

10 Without waiving said objections, Responding Party responds: Responding Party is without
11 sufficient personal knowledge to admit or deny this request.

12 **REQUEST FOR ADMISSION NO. 29:**

13 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA STATE
14 GRANGE on January 1, 2012.

15 For the purposes of these Requests for Admission, the term "DIGEST OF LAWS" shall refer to
16 Digest of Laws of the Order of Patrons of Husbandry adopted and proclaimed by the National Grange.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

18 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
19 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
20 Intervention) claim to be the "California State Grange," and Responding Party does not know
21 Propounding Party's contentions as to its own origins. California State Grange, a California state
22 corporation, is not and never has been a "legal division" of the National Grange. Responding Party
23 further objects that the term "applied to the CALIFORNIA STATE GRANGE" is overbroad and
24 vague and ambiguous. The term "CALIFORNIA STATE GRANGE" is compound, conjunctive,
25 and/or disjunctive as defined. Object to the extent this calls for a legal conclusion. Responding party
26 further objects that the request includes information protected by the attorney client privilege and/or
27 attorney client work product doctrine. Furthermore, discovery is ongoing and responding party
28 reserves his right to amend should more information become available.

1 **REQUEST FOR ADMISSION NO. 30:**

2 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA STATE
3 GRANGE on September 16, 2012.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

5 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
6 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
7 Intervention) claim to be the "California State Grange," and Responding Party does not know
8 Propounding Party's contentions as to its own origins. Responding Party further objects that the term
9 "applied to the CALIFORNIA STATE GRANGE" is overbroad and vague and ambiguous.
10 California State Grange, a California state corporation, is not and never has been a "legal division" of
11 the National Grange. The term "CALIFORNIA STATE GRANGE" is compound, conjunctive, and/or
12 disjunctive as defined. Object to the extent this calls for a legal conclusion. Responding party further
13 objects that the request includes information protected by the attorney client privilege and/or attorney
14 client work product doctrine. Furthermore, discovery is ongoing and responding party reserves his
15 right to amend should more information become available.

16 **REQUEST FOR ADMISSION NO. 31:**

17 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA STATE
18 GRANGE on January 1, 2013.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 31:**

20 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
21 vague and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-
22 in-Intervention) claim to be the "California State Grange," and Responding Party does not know
23 Propounding Party's contentions as to its own origins. Responding Party further objects that the term
24 "applied to the CALIFORNIA STATE GRANGE" is overbroad and vague and ambiguous. The term
25 "CALIFORNIA STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Object
26 to the extent this calls for a legal conclusion. California State Grange, a California state corporation,
27 is not and never has been a "legal division" of the National Grange. Responding party further objects
28 that the request includes information protected by the attorney client privilege and/or attorney client

1 work product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to
2 amend should more information become available.

3 **REQUEST FOR ADMISSION NO. 32:**

4 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA STATE
5 GRANGE on April 4, 2013.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 32:**

7 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
8 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
9 Intervention) claim to be the "California State Grange," and Responding Party does not know
10 Propounding Party's contentions as to its own origins. Responding Party further objects that the term
11 "applied to the CALIFORNIA STATE GRANGE" is overbroad and vague and ambiguous. The term
12 "CALIFORNIA STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Object
13 to the extent this calls for a legal conclusion. California State Grange, a California state corporation,
14 is not and never has been a "legal division" of the National Grange. Responding party further objects
15 that the request includes information protected by the attorney client privilege and/or attorney client
16 work product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to
17 amend should more information become available.

18 **REQUEST FOR ADMISSION NO. 33:**

19 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA STATE
20 GRANGE on October 1, 2013.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 33:**

22 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
23 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
24 Intervention) claim to be the "California State Grange," and Responding Party does not know
25 Propounding Party's contentions as to its own origins. California State Grange, a California state
26 corporation, is not and never has been a "legal division" of the National Grange. Responding Party
27 further objects that the term "applied to the CALIFORNIA STATE GRANGE" is overbroad and
28 vague and ambiguous. The term "CALIFORNIA STATE GRANGE" is compound, conjunctive,

1 and/or disjunctive as defined. Object to the extent this calls for a legal conclusion. Responding party
2 further objects that the request includes information protected by the attorney client privilege and/or
3 attorney client work product doctrine. Furthermore, discovery is ongoing and responding party
4 reserves his right to amend should more information become available.

5 **REQUEST FOR ADMISSION NO. 34:**

6 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA STATE
7 GRANGE on December 31, 2013.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

9 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
10 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
11 Intervention) claim to be the "California State Grange," and Responding Party does not know
12 Propounding Party's contentions as to its own origins. Responding Party further objects that the term
13 "applied to the CALIFORNIA STATE GRANGE" is overbroad and vague and ambiguous. The term
14 "CALIFORNIA STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Object
15 to the extent this calls for a legal conclusion. California State Grange, a California state corporation,
16 is not and never has been a "legal division" of the National Grange. Responding party further objects
17 that the request includes information protected by the attorney client privilege and/or attorney client
18 work product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to
19 amend should more information become available.

20 **REQUEST FOR ADMISSION NO. 35:**

21 Admit that the CALIFORNIA STATE GRANGE sent annual and quarterly reports to the
22 National Grange prior to April 5, 2013.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

24 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
25 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
26 Intervention) claim to be the "California State Grange," and Responding Party does not know
27 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
28 is compound, conjunctive, and/or disjunctive as defined. Overbroad and not limited in temporal

1 scope. Responding party further objects that the request includes information protected by the
2 attorney client privilege and/or attorney client work product doctrine. Furthermore, discovery is
3 ongoing and responding party reserves his right to amend should more information become available.

4 Without waiving said objections, the Responding Party responds: Admit as to California State
5 Grange, a California state corporation.

6 **REQUEST FOR ADMISSION NO. 36:**

7 Admit that the CALIFORNIA STATE GRANGE participated in the Grange Insurance
8 Association prior to April 5, 2013.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

10 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
11 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
12 Intervention) claim to be the "California State Grange," and Responding Party does not know
13 Propounding Party's contentions as to its own origins. Responding Party objects to the term
14 "participated in" as vague and ambiguous. The term "CALIFORNIA STATE GRANGE" is
15 compound, conjunctive, and/or disjunctive as defined. Overbroad and not limited in temporal scope.
16 Responding party further objects that the request includes information protected by the attorney client
17 privilege and/or attorney client work product doctrine. Furthermore, discovery is ongoing and
18 responding party reserves his right to amend should more information become available.

19 Without waiving said objections, the Responding Party further objects as the amount of
20 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
21 2033.030(b).

22 **REQUEST FOR ADMISSION NO. 37:**

23 Admit that the CALIFORNIA STATE GRANGE paid dues to the National Grange prior to
24 April 5, 2013.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

26 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
27 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
28 Intervention) claim to be the "California State Grange," and Responding Party does not know

1 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE GRANGE"
2 is compound, conjunctive, and/or disjunctive as defined. Overbroad and not limited in temporal
3 scope. Responding party further objects that the request includes information protected by the
4 attorney client privilege and/or attorney client work product doctrine. Furthermore, discovery is
5 ongoing and responding party reserves his right to amend should more information become available.

6 Without waiving said objections, the Responding Party further objects as the amount of
7 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
8 2033.030(b).

9 **REQUEST FOR ADMISSION NO. 38:**

10 Admit that the CALIFORNIA STATE GRANGE took part in programs sponsored by the
11 National Grange prior to April 5, 2013.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 38:**

13 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
14 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
15 Intervention) claim to be the "California State Grange," and Responding Party does not know
16 Propounding Party's contentions as to its own origins. Responding Party further objects that the
17 phrase "took part in programs" is vague and ambiguous. The term "CALIFORNIA STATE
18 GRANGE" is compound, conjunctive, and/or disjunctive as defined. Overbroad and not limited in
19 temporal scope. Responding party further objects that the request includes information protected by the
20 attorney client privilege and/or attorney client work product doctrine. Furthermore, discovery is
21 ongoing and responding party reserves his right to amend should more information become available.

22 Without waiving said objections, the Responding Party further objects as the amount of
23 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
24 2033.030(b).

25 **REQUEST FOR ADMISSION NO. 39:**

26 Admit that the CALIFORNIA STATE GRANGE was represented by the National Grange in
27 lobbying activities prior to April 5, 2013.

28 ///

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 39:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
3 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
4 Intervention) claim to be the "California State Grange," and Responding Party does not know
5 Propounding Party's contentions as to its own origins. Responding Party further objects that the
6 phrase "was represented by" is vague and ambiguous. The term "CALIFORNIA STATE GRANGE"
7 is compound, conjunctive, and/or disjunctive as defined. Overbroad and not limited in temporal
8 scope. Responding party further objects that the request includes information protected by the
9 attorney client privilege and/or attorney client work product doctrine. Furthermore, discovery is
10 ongoing and responding party reserves his right to amend should more information become available.

11 Without waiving said objections, the Responding Party further objects as the amount of
12 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
13 2033.030(b).

14 **REQUEST FOR ADMISSION NO. 40:**

15 Admit that YOU were elected to the Executive Committee of the CALIFORNIA STATE
16 GRANGE in 2008.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 40:**

18 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
19 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
20 Intervention) claim to be the "California State Grange," and Responding Party does not know
21 Propounding Party's contentions as to its own origins. Responding party further objects that the
22 request includes information protected by the attorney client privilege and/or attorney client work
23 product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to amend
24 should more information become available.

25 Without waiving said objections, the Responding Party further objects as the amount of
26 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
27 2033.030(b).

28 ///

1 **REQUEST FOR ADMISSION NO. 41:**

2 Admit that YOU were installed as a member of the Executive Committee for the
3 CALIFORNIA STATE GRANGE pursuant to Section 10.4.7 of the DIGEST OF LAWS and Section
4 14.6 of the Bylaws of the CALIFORNIA STATE GRANGE.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 41:**

6 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
7 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not full
8 and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party objects
9 that the definition of "CALIFORNIA STATE GRANGE" is vague and ambiguous, in that both the
10 Defendant in this action and the Propounding Party (Plaintiff-in-Intervention) claim to be the
11 "California State Grange," and Responding Party does not know Propounding Party's contentions as
12 to its own origins. Responding Party objects that the phrase "pursuant to" and the term "installed"
13 are vague and ambiguous. Responding Party objects to the request to the extent it calls for a legal
14 opinion or conclusion. Responding party further objects that the request includes information
15 protected by the attorney client privilege and/or attorney client work product doctrine. Furthermore,
16 discovery is ongoing and responding party reserves his right to amend should more information
17 become available.

18 Without waiving said objections, the Responding Party further objects as the amount of
19 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
20 2033.030(b).

21 **REQUEST FOR ADMISSION NO. 42:**

22 Admit that at the time of installation in office as a member of the Executive Committee of the
23 CALIFORNIA STATE GRANGE, YOU agreed pursuant to Article III of the Constitution of the
24 CALIFORNIA STATE GRANGE to at all times "faithfully comply with the Constitution, By-Laws,
25 and Codes of Conduct of the Grange at all levels."

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 42:**

27 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
28 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not full

1 and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party objects
2 that the definition of "CALIFORNIA STATE GRANGE" is vague and ambiguous, in that both the
3 Defendant in this action and the Propounding Party (Plaintiff-in-Intervention) claim to be the
4 "California State Grange," and Responding Party does not know Propounding Party's contentions as
5 to its own origins. Responding Party objects that the phrase "pursuant to" and the term "installation"
6 are vague and ambiguous. Responding Party objects to the request to the extent it calls for a legal
7 opinion or conclusion. Responding party further objects that the request includes information
8 protected by the attorney client privilege and/or attorney client work product doctrine. Furthermore,
9 discovery is ongoing and responding party reserves his right to amend should more information
10 become available.

11 Without waiving said objections, the Responding Party further objects as the amount of
12 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
13 2033.030(b).

14 **REQUEST FOR ADMISSION NO. 43:**

15 Admit that YOU were elected to the office of Master of the CALIFORNIA STATE GRANGE
16 in 2009.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 43:**

18 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
19 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not full
20 and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party objects
21 that the definition of "CALIFORNIA STATE GRANGE" is vague and ambiguous, in that both the
22 Defendant in this action and the Propounding Party (Plaintiff-in-Intervention) claim to be the
23 "California State Grange," and Responding Party does not know Propounding Party's contentions as to
24 its own origins. Responding party further objects that the request includes information protected by the
25 attorney client privilege and/or attorney client work product doctrine. Furthermore, discovery is
26 ongoing and responding party reserves his right to amend should more information become available.

27 Without waiving said objections, the Responding Party further objects as the amount of
28 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §

1 2033.030(b).

2 **REQUEST FOR ADMISSION NO. 44:**

3 Admit that YOU were installed as Master of the CALIFORNIA STATE GRANGE pursuant to
4 Section 10.4.7 of the DIGEST OF LAWS and Section 14.6 of the Bylaws of the CALIFORNIA
5 STATE GRANGE.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 44:**

7 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
8 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not full
9 and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party objects
10 that the definition of "CALIFORNIA STATE GRANGE" is vague and ambiguous, in that both the
11 Defendant in this action and the Propounding Party (Plaintiff-in-Intervention) claim to be the
12 "California State Grange," and Responding Party does not know Propounding Party's contentions as
13 to its own origins. Responding Party objects that the phrase "pursuant to" and the term "installation"
14 are vague and ambiguous. Responding Party objects to the request to the extent it calls for a legal
15 opinion or conclusion. Responding party further objects that the request includes information
16 protected by the attorney client privilege and/or attorney client work product doctrine. Furthermore,
17 discovery is ongoing and responding party reserves his right to amend should more information
18 become available.

19 Without waiving said objections, the Responding Party further objects as the amount of
20 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
21 2033.030(b).

22 **REQUEST FOR ADMISSION NO. 45:**

23 Admit that at the time of installation in office as Master of the CALIFORNIA STATE
24 GRANGE, YOU agreed pursuant to Article III of the Constitution of the CALIFORNIA STATE
25 GRANGE to at all times "faithfully comply with the Constitution, By-Laws, and Codes of Conduct of
26 the Grange at all levels."

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 45:**

28 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in

1 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not full
2 and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party objects
3 that the definition of "CALIFORNIA STATE GRANGE" is vague and ambiguous, in that both the
4 Defendant in this action and the Propounding Party (Plaintiff-in-Intervention) claim to be the
5 "California State Grange," and Responding Party does not know Propounding Party's contentions as
6 to its own origins. Responding Party objects that the phrase "pursuant to" and the term "installation"
7 are vague and ambiguous. Responding Party objects to the request to the extent it calls for a legal
8 opinion or conclusion. Responding party further objects that the request includes information
9 protected by the attorney client privilege and/or attorney client work product doctrine. Furthermore,
10 discovery is ongoing and responding party reserves his right to amend should more information
11 become available.

12 Without waiving said objections, the Responding Party further objects as the amount of
13 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
14 2033.030(b).

15 **REQUEST FOR ADMISSION NO. 46:**

16 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on January 1, 2012.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 46:**

18 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
19 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not full
20 and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party objects
21 the phrase "applied to YOU" is vague and ambiguous. Overbroad. Responding party further objects
22 that the request includes information protected by the attorney client privilege and/or attorney client
23 work product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to
24 amend should more information become available.

25 Without waiving said objections, the Responding Party further objects as the amount of
26 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
27 2033.030(b).

28 ///

1 **REQUEST FOR ADMISSION NO. 47:**

2 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on September 16,
3 2012.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 47:**

5 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
6 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not full
7 and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party objects
8 the phrase "applied to YOU" is vague and ambiguous. Overbroad. Responding party further objects
9 that the request includes information protected by the attorney client privilege and/or attorney client
10 work product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to
11 amend should more information become available.

12 Without waiving said objections, the Responding Party further objects as the amount of
13 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
14 2033.030(b).

15 **REQUEST FOR ADMISSION NO. 48:**

16 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on January 1, 2013.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 48:**

18 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
19 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not full
20 and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party objects
21 the phrase "applied to YOU" is vague and ambiguous. Overbroad. Responding party further objects
22 that the request includes information protected by the attorney client privilege and/or attorney client
23 work product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to
24 amend should more information become available.

25 Without waiving said objections, the Responding Party further objects as the amount of
26 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
27 2033.030(b).

28 ///

1 **REQUEST FOR ADMISSION NO. 49:**

2 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on April 4, 2013.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 49:**

4 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
5 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not full
6 and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party objects
7 the phrase "applied to YOU" is vague and ambiguous. Overbroad. Responding party further objects
8 that the request includes information protected by the attorney client privilege and/or attorney client
9 work product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to
10 amend should more information become available.

11 Without waiving said objections, the Responding Party further objects as the amount of
12 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
13 2033.030(b).

14 **REQUEST FOR ADMISSION NO. 50:**

15 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on October 1, 2013.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 50:**

17 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
18 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not full
19 and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party objects
20 the phrase "applied to YOU" is vague and ambiguous. Overbroad. Responding party further objects
21 that the request includes information protected by the attorney client privilege and/or attorney client
22 work product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to
23 amend should more information become available.

24 Without waiving said objections, the Responding Party further objects as the amount of
25 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
26 2033.030(b).

27 **REQUEST FOR ADMISSION NO. 51:**

28 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on December 31,

1 2013.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 51:**

3 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
4 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not full
5 and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party objects
6 the phrase "applied to YOU" is vague and ambiguous. Overbroad. Responding party further objects
7 that the request includes information protected by the attorney client privilege and/or attorney client
8 work product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to
9 amend should more information become available.

10 Without waiving said objections, the Responding Party further objects as the amount of
11 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
12 2033.030(b).

13 **REQUEST FOR ADMISSION NO. 52:**

14 Admit that an entity may not operate as a Grange within the Order of Patrons of Husbandry
15 without a Charter issued by the National Grange.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 52:**

17 Responding Party objects that the request is, as a whole, vague and ambiguous. Responding
18 Party objects to the extent the request calls for a legal conclusion or legal opinion. Responding Party
19 objects that the terms "an entity", "may not", "operate", "as a Grange", and "within the Order" are
20 vague and ambiguous in the context of the request. Overbroad. Calls for a legal conclusion.
21 Responding party further objects that the request includes information protected by the attorney client
22 privilege and/or attorney client work product doctrine. Furthermore, discovery is ongoing and
23 responding party reserves his right to amend should more information become available.

24 Without waiving said objections, the Responding Party responds: Responding Party is without
25 sufficient personal knowledge to admit or deny the request.

26 Without waiving said objections, the Responding Party further objects as the amount of
27 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
28 2033.030(b).

1 **REQUEST FOR ADMISSION NO. 53:**

2 Admit that an entity may not operate as a State Grange within the Order of Patrons of
3 Husbandry without a Charter issued by the National Grange.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 53:**

5 Responding Party objects that the request is, as a whole, vague and ambiguous. Responding
6 Party objects to the extent the request calls for a legal conclusion or legal opinion. Responding Party
7 objects that the terms "an entity", "may not", "operate", "as a State Grange", and "within the Order"
8 are vague and ambiguous in the context of the request. Overbroad. Calls for a legal conclusion.
9 Responding party further objects that the request includes information protected by the attorney client
10 privilege and/or attorney client work product doctrine. Furthermore, discovery is ongoing and
11 responding party reserves his right to amend should more information become available.

12 Without waiving said objections, the Responding Party further objects as the amount of
13 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
14 2033.030(b).

15 **REQUEST FOR ADMISSION NO. 54:**

16 Admit that the entity YOU purport to be the "California State Grange" is operating without a
17 Charter issued by the National Grange.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 54:**

19 Responding Party objects that the term "the entity YOU purport to be the 'California State
20 Grange'" is vague, ambiguous, and unintelligible. Responding Party objects that the term "operating"
21 is vague and ambiguous. Assumes facts and lacks foundation to the extent a charter is necessary to
22 operate as the California State Grange. Overbroad. Calls for a legal conclusion. Responding party
23 further objects that the request includes information protected by the attorney client privilege and/or
24 attorney client work product doctrine. Furthermore, discovery is ongoing and responding party
25 reserves his right to amend should more information become available.

26 Without waiving said objections, the Responding Party further objects as the amount of
27 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
28 2033.030(b).

1 **REQUEST FOR ADMISSION NO. 55:**

2 Admit that since April 5, 2013, the activities of the entity YOU purport to be the "California
3 State Grange" have not been in furtherance of the general purposes of the Order of Patrons of
4 Husbandry.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 55:**

6 Responding Party objects that the term "the entity YOU purport to be the 'California State
7 Grange'" is vague, ambiguous, and unintelligible. Responding Party objects that the request is
8 overbroad and vague and ambiguous with respect to the terms "activities" and "in furtherance of the
9 general purposes of the Order of Patrons of Husbandry." Responding Party objects to the extent the
10 request calls for a legal conclusion or legal opinion. Overbroad. Calls for speculation. Responding
11 party further objects that the request includes information protected by the attorney client privilege
12 and/or attorney client work product doctrine. Furthermore, discovery is ongoing and responding party
13 reserves his right to amend should more information become available.

14 Without waiving said objections, the Responding Party further objects as the amount of
15 requests exceed 35 and have been propounded without a declaration of necessity. *See* CCP §
16 2033.030(b).

17 **REQUEST FOR ADMISSION NO. 56:**

18 Admit that since April 5, 2013, the activities of the entity YOU purport to be the "California State
19 Grange" have not been in furtherance of the general purposes of the National Grange.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 56:**

21 Responding Party objects that the term "the entity YOU purport to be the 'California State
22 Grange'" is vague, ambiguous, and unintelligible. Responding Party objects that the request is
23 overbroad and vague and ambiguous with respect to the terms "activities" and "in furtherance of the
24 general purposes of the National Grange." Responding Party objects to the extent the request calls for
25 a legal conclusion or legal opinion. Overbroad. Call for speculation. Responding party further objects
26 that the request includes information protected by the attorney client privilege and/or attorney client
27 work product doctrine. Furthermore, discovery is ongoing and responding party reserves his right to
28 amend should more information become available.

1 Without waiving said objections, the Responding Party further objects as the amount of
2 requests exceed 35 and have been propounded without a declaration of necessity. See CCP §
3 2033.030(b).

4
5 Dated: January 16, 2015

6 ELLIS LAW GROUP, LLP

7
8 By



William A. Lapcevic
Attorney for DEFENDANT/CROSS COMPLAINANT
ROBERT McFARLAND

VERIFICATION

1 I, Robert McFarland, declare:

2 I am a party in this action.

3 I have read the foregoing ROBERT McFARLAND'S RESPONSES TO PLAINTIFFS-IN-
4 INTERVENTION'S REQUESTS FOR ADMISSION, SET ONE, and the same is true of my own
5 knowledge, except as to those matters which are therein stated on information and belief, and as to
6 those matters, I believe them to be true.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing is
8 a true and correct statement.

9 Executed this 16th day of January, 2015, at ROSENLE, California.

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12 _____
13 Robert McFarland
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CERTIFICATE OF SERVICE

I, Karen Gould, declare:

I am a citizen of the United States, am over the age of eighteen years, and am not a party to or interested in the within entitled cause. My business address is 740 University Avenue, Suite 100, Sacramento, CA 95825.

On the date below, I served the following document on the parties in the within action:

ROBERT McFARLAND'S RESPONSES TO PLAINTIFFS-IN-INTERVENTION'S REQUESTS FOR ADMISSION, SET ONE

X

BY MAIL: I am familiar with the business practice for collection and processing of mail. The above-described document(s) will be enclosed in a sealed envelope, with first class postage thereon fully prepaid, and deposited with the United States Postal Service at Sacramento, CA on this date, addressed as follows:

VIA OVERNIGHT SERVICE: The above-described document(s) will be delivered by overnight service, to the following:

Martin Jensen
Thomas Riordan
PORTER SCOTT
350 University Avenue, Suite 200
Sacramento, CA 95825

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I declare under penalty of perjury that the foregoing is true and correct. Executed at Sacramento, California on January 16, 2015.

By

Karen Gould
Karen Gould, CCLS