

RNHA



Republican National Hispanic Assembly
PO Box 5991
Lakeland, Florida 33807
206- 337-1464

DATE: February 26, 2011
TO: Republican National Hispanic Assembly of Illinois
Rafael Rivadeneira, Steve Orlando, Mark Aguilera, Gloria Campos et al
FROM: Republican National Hispanic Assembly National Executive Committee
RE: RNHA of Illinois Convention, February 5, 2011

Dear Mssrs. Rivadeneira, Orlando, Aguilera and Ms. Campos:

The Republican National Hispanic Assembly National Committee (hereinafter “RNHA”) has plenary jurisdiction over the RNHA of Illinois pursuant to RNHA Rule 3 (Amended July 21, 2007).

Your chapter has brought to our attention the disputed election of the February 5, 2011 RNHA of Illinois State Convention. The RNHA does not interfere lightly in the affairs of its state chapters, however, in the instant case, we can no longer ignore the strife and dissent in your state chapter which stem from the contested election and its outcome.

The controversy in your state chapter has brought widespread negative attention to both your state chapter as well as to the Republican Party of Illinois. The RNHA National Executive Committee is greatly concerned with the recent escalation of ad hominem attacks, public disparagement of members on both sides of the instant issue and general erosion of the reputation of the RNHA of Illinois chapter and indeed, the RNHA organization and the Republican Party in light of public pronouncements, press releases, letters, new media contacts (Facebook, Twitter, etc.) which your members have distributed regarding this matter. The RNHA is appalled at the escalation of the negativity in your chapter. This is absolutely intolerable.

To say the least, we are disappointed by the actions of your members who continue to disseminate negative information about anyone in the RNHA. This is not helpful, it is not productive and it does not help your state chapter's reputation and credibility nor the merits of your respective arguments in this case.

We have encouraged all of you to engage in civil discourse and to attempt to resolve the outstanding issues for the good of your RNHA of Illinois and the Republican Party. To date, unfortunately, there has been no progress toward an amicable solution of this matter. Since the disputed February 5, 2011 RNHA of Illinois Convention, you and your supporters have forwarded various materials to us and we have carefully reviewed these items.

We have requested all of you, as representatives of your sides in the dispute, to request all of your members to refrain from any public comments about the controversy for the good of the organization. We have encouraged all of you to engage in open, useful and civil dialogue to initiate the healing process and to move forward in fellowship and in unity for the good of the RNHA and the Republican Party. Unfortunately, the RNHA sees no progress to date towards a settlement of this matter.

Accordingly, pursuant to the vote of the RNHA National Executive Committee with the advice of the RNHA National General Counsel and legal team, we hereby send you the following directions today, Saturday, February 26, 2011 regarding the steps we plan to take to resolve this matter.

For the good of the RNHA and the Republican Party, ALL RNHA members in the State of Illinois are henceforth to refrain from publicly discussing anything related to this matter until the RNHA National Executive Committee has taken final action to bring this dispute to its conclusion. Public comments include but are not limited to communications to the media, to membership databases, internet or emailed communications, or any other dissemination of information about this pending matter or about any member of the RNHA until this case has been decided. The foregoing applies as well to surrogates or representatives of members.

The RNHA National Executive Committee views such conduct as disruptive and harmful to the RNHA and it will not be tolerated irrespective of any officer or member.

Additionally, the two competing slates of officers, led by Messieurs Rafael Rivadeneira and Steve Orlando are to get together and to mediate over the next three days to attempt to settle all outstanding issues in this matter and are to report to the National Chairman via an emailed jointly prepared statement by **Tuesday evening, March 1, 2011** by 9:00pm Eastern whether the parties have resolved this dispute. If there is an impasse, the RNHA National Chairman will in turn forward this notification of impasse to the RNHA National Executive Committee.

In the event that the parties cannot reach a settlement of the disputed convention to resolve the issue of official recognition of the Illinois RNHA state chapter, the RNHA National Executive Committee instructs the parties as follows:

Based on the parties' submissions to date, it appears that there was an officially called RNHA of Illinois Convention and it was duly convened on February 5, 2011 and the Parliamentarian

was approved to assist during the convention by the majority of credentialed delegates. Accordingly, the various findings of fact and rulings by the Parliamentarian pursuant to but not limited to the RNHA of Illinois Bylaws and Roberts Rules of Order are presumed correct and the RNHA will not disturb such findings absent a showing of an abuse of discretion or other legally compelling reason.

Accordingly, there is a presumption that at the RNHA of Illinois Convention, the meeting took place at which a valid RNHA state organization and state committee were organized and now seek recognition for purposes of membership in the RNHANC. It also appears that sometime during this convention, a group left this meeting and convened at a separate location to organize another RNHA state organization and state committee for the State of Illinois. Mr. Rivadeneira and Mr. Orlando, as leaders of the two purported RNHA state organizations which are now competing for recognition as the RNHA of Illinois state organization are hereby designated as the two parties for the purposes of the following procedure:

If Mr. Steve Orlando wishes to challenge the recognition of the state organization and state committee which were organized during the original Convention, he may file an appeal with the RNHA National Executive Committee either pro se or through one representative, and said appeal shall consist of no more than five (5) typewritten pages, New Times Roman, font size 12, and double spaced per page. The submission shall be submitted by 9:00pm Eastern time March 6, 2011 via electronic mail to the RNHA National Chairman Alci Maldonado (address: chair@rnha.org) for distribution to the RNHA National Executive Committee and RNHA National General Counsel.

The appellant will copy the appellee Rafael Rivadeniera with his submission at the time he submits his written appeal to the RNHA National Executive Committee and the appellee will submit a written response not to exceed five (5) typewritten pages, New Times Roman, font size 12, double spaced per page to the RNHA National Chairman Alci Maldonado (address: chair@rnha.org) no later than 9:00pm Eastern time, March 13, 2011 for distribution to the RNHA National Executive Committee and RNHA National General Counsel and the appellee will copy the appellant contemporaneously with his submission to the RNHA National Executive Committee as well.

Thereafter, the RNHA National Executive Committee will set a private teleconference which will serve as a hearing during which the appellant or appellee pro se, or one (1) spokesman representative from each side shall have 15 minutes for oral argument and each side may reserve a portion of said 15 minutes for any rebuttals. During the conference call, if the appellant is pro se and/or the appellee is pro se, only the pro se party (ies) may make the presentations.

In the event either or both parties have representatives, as applicable, only the representative(s) for Steve Orlando and Rafael Rivadeneira will be permitted to present their cases and only Mssrs. Orlando and Rivadeneira will be permitted to listen but not speak during

the teleconference hearing. The RNHA National Executive Committee will subsequently deliberate regarding the case and will issue a decision within a reasonable time after deliberation has concluded.

The RNHA National Executive Committee thanks you in advance for your anticipated cooperation and for your advising your officers, supporters, members and surrogates of our immediate direction to you from the RNHA National Executive Committee.

Sincerely,

[Alci Maldonado](#)

Alci Maldonado
Republican National Hispanic Assembly
National Chairman

[Tony Benegas](#)

Tony Benegas
Republican National Hispanic Assembly
First Co-Chairman

[David Olivencia](#)

David Olivencia
Republican National Hispanic Assembly
Second Co-Chairman

[Manuel Perez](#)

Manuel Perez
Republican National Hispanic Assembly
National Treasurer

[Bob Spindell](#)

Bob Spindell
Republican National Hispanic Assembly
National Assistant Treasurer

[Lisa Benegas](#)

Lisa Benegas
Republican National Hispanic Assembly
National Secretary

[Debbie Bishop](#)

Debbie Bishop
Republican National Hispanic Assembly
National Assistant Secretary

[Robert Bunn](#)

Robert Bunn, Esq.
Republican National Hispanic Assembly
General Counsel, Chair Legal Team

[Carole Jean Jordan](#)

Carole Jean Jordan
Republican National Hispanic Assembly
National Parliamentarian