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June 17, 2011

Via Certified Mail and Return Receipt Requested

Alci Maldonado
Robert DeV.Bunn, Esq.
5747 S.W. 75th Street, Suite 297
Gainesville, FL 32608-5504

Dear Ms. Maldonado & Mr. DeV. Bunn:

Please be advised that I represent the Illinois Chapter of the Republican National Hispanic Assembly (RNHAIL). At approximately 4:00p.m. on Friday, June 10, 2011, Rafael Rivadeneira, received your certified letter dated June 3, 2011, informing him of your Mandate/decision ("Mandate") regarding the appeal filed by Steven Orlando ("Orlando"), et.al. to which he subsequently responded. On behalf of the RNHAIL I am filing a limited appeal of the Mandate.

RNHAIL responds to each of the rulings in your Mandate as follows:

- 1) RNHAIL concurs with your decision in paragraph 1) and does not appeal your decision to summarily dismiss the appeal of Orlando.
- 2) RNHAIL concurs with and does not appeal your decision to recognize Mr. Rivadeneira's election as Chairman of the Illinois Chapter of the Republican National Hispanic Assembly.
- 3) RNHAIL does not concur and hereby appeals your decision to deny its right to invoke paragraph 14(d). As Mr Rivadeneira was the outgoing Chairman at the time of the election he was still Chairman until the new Chairman was elected. Furthermore, Rule 14(d) does not

require that the petitioner to be Chairman of a State Chapter to call for a meeting of the RNHA National Committee.

4) RNHAIL does not concur with your statement that there were insufficient members of the RNHANC to call a meeting and that Mr. Rivadeneira lacked the standing because he failed to comply with instructions from the RNHAEC. Your Mandate failed to identify any way in which he did not comply with your instructions at any point in the process. Furthermore, as the Chairwoman knows from the numerous e-mails that she received from Mr. Rivadeneira and others supporting his call for a meeting of the RNHANC, there were more than 25% of RNHA members calling for this meeting from more than 25% of the states represented in the RNHA. If allowed, RNHAIL will provide additional documentation substantiating this point.

5) RNHAIL does not concur with and hereby appeals your decision and statements in paragraph 5.

First, while the process was intense the RNHAIL does not believe whether something is or is not embarrassing to a particular Chairwoman should be the determinative factor in whether or not to decertify a State Chapter of the RNHA. Nothing illegal took place and there were no lewd pictures or extra marital affairs, just 2 different groups making their case for recognition by the RNHANC. More specifically: 1) Rule 3 indicates that the RNHA *National Committee* has authority to decertify State Chapters, not the RNHA *Executive Committee*. Therefore the decision of the Chairwoman and General Counsel to decertify the Illinois State Chapter is void *ab initio*. 2) Rule 12(a) (2) only applies to Organization of State Chapters and is inapplicable to decertifying a State Chapter. 3) Rule 15(b) gives the RNHA Executive Committee the authority to exercise executive and administrative functions of the RNHANC. There is no process for decertification provided anywhere in the Rules of the RNHA. Therefore, there is no

administrative process for the Executive to execute. The suggestion that the RNHA empowered the Chairwoman or the Executive Committee to decertify State Chapters because someone was embarrassed or did not approve of “behavior” of its members hurts the credibility of the RHNA and the notion that the RNHA operates by fairness and due process. The standard of care for giving a state chapter the death penalty needs to be more rigorous than a subjective opinion as to whether or not “behavior” is acceptable or some one is embarrassed. If not, the credibility of the RNHA will be damaged. The Executive Committee alleges that there was damage to the RHNA, but fails to state or establish what the damage was, so that there is nothing for the RNHAIL to refute.

The Executive Committee goes on to allege that the RNHAIL failed to follow instructions but, again, provided no evidence of such failure. It is unfair to disenfranchise Hispanic Republicans from the State of Illinois based on subjective, unsubstantiated claims that instructions were not followed, that parties had “behavioral” issues and that the parties conduct was embarrassing and then fail to substantiate any of those allegations.

6) The RNHACEC provided seven (7) days to respond from the date of their decision. However, as stated above, Mr. Rivadeneira did not receive the RNHAEC decision until seven (7) days after their decision. Therefore, I assume that the RNHAEC will reasonably accept this response as it is within 7 days from the date he received the Mandate..

Thank you for your consideration.

Very truly yours,



Paul R. Buikema

cc: Rafael Rivadeneria