

February 27, 2023

To:

Joy Silver, Chair (chair.rcdp@gmail.com)

Agi Kessler, Vice (vicechairrcdp@gmail.com)

Riverside County Democratic Party

From:

Stephen R. Jaffe (stephenrjaffe@gmail.com)

415-652-6744

**Re: FORMAL COMPLAINT FOR VIOLATION OF RIVERSIDE
COUNTY DEMOCRATIC PARTY CODE OF CONDUCT**

Chair Silver and Vice Chair Kessler:

This is a formal complaint against Pricilla Richardson (“Richardson”) and possible others for multiple violations of the Riverside County Democratic Party Code of Conduct (“Code”). The Code provides, in relevant part:¹

“The Riverside County Democratic Party (RCDP) is committed to providing a welcoming, respectful, friendly, safe, supportive, and harassment-free environment for members, employees, and all others associated with RCDP. RCDP expects all leaders, members, employees, and others associated with RCDP to act professionally, respecting the personal rights and dignities of all individuals involved with the Party to create a productive, inclusive environment for all. All individuals should feel welcome and safe within RCDP, regardless of their sex, gender, gender identity, gender expression, sexual orientation, pregnancy, race, color, ethnicity, national origin, ancestry, religion, creed, age, physical or mental disability, medical

¹ Portions of the Code relevant to this matter are highlighted.

condition, genetic information, marital status, military or veteran status, body size, domestic violence victim status, or any other legally protected classifications. RCDP's behavior standards are not limited to RCDP membership meetings, Regional meetings, Assembly District meetings, or RCDP events. Harassment will not be tolerated at any and all events sponsored by or affiliated with the RCDP, as well as in RCDP-related calls, texts, emails, and social media like Facebook, Instagram, and Snapchat. RCDP expects its Chartered Clubs and Organizations to establish and enforce parallel behavioral standards."

"The RCDP will not tolerate prohibited harassment based on any of the protected categories listed above. Prohibited harassment can be verbal (such as slurs, jokes, insults, epithets, gestures, or teasing . . ."

At 11:50 PM on February 26, 2023, Ms. Richardson transmitted the following email ² to me:

"Okay Stephen,

I've had it with you and will say my piece, then you are out of DOD for good and good riddance.

First - your "Attorney at Law" moniker on all your communications is stupid, arrogant, and just a joke to me as I have been surrounded by multiple attorneys in my family as well as having a total social circle of attorneys. Come on - this is a totally pathetic little addition to your signature and means nothing.

My background is as a Debater on winning teams in high school and college, a Congressional Staffer in DC and Seattle, a holder of a Master's in Public Administration. At the Washington state SPI, I was the 20 year Director of Consolidated Federal Programs (accountable for \$400 million annually) and more. You have continually insulted those of us who spent happy years building DOD,, the powerhouse Democratic club of the

²The Richardson email letter is reproduced exactly as it was sent, with no corrections for formatting, spacing, grammar or spelling errors.

desert. We were so good that Congressman Ruiz appointed me to be the Elector to represent our district in Sacramento at the Electoral College in 2016/17 in Sacramento.

Last fall on a zoom meeting where Will Rollins took his precious campaign time to do a zoom meeting for DOD there were only twelve people at the meeting - what a waste of time for him! I and others made suggestions to you about previously successful strategies/programs to encourage meeting participation from our members. You rejected all recommendations - choosing not to do member outreach.

At the endorsement meeting there were multiple problems. First was that the endorsements were too late to matter, and I don't know why we were so late, but we were. There were several other issues where both the DOD by-laws and RCDP guidance was violated (endorsing a non-Democrat when the county had already endorsed a Democrat) This was an example of you not knowing/understanding/respecting the endorsement rules of the RCDP.

At the February 25 meeting of DOD you violated at least three of the by-laws of DOD which you pretended to represent. Please review Section 8.2 about nomination of candidates. As I read it, Michael Finland's nomination as a candidate is not valid, as it was not accompanied by written or verifiable oral confirmation that he will serve - frankly, from my standpoint - I like Michael and appreciate his dedication - but you, Stephen, need to know that you undercut your preferred people when you don't understand/follow/respect the DOD by-laws. If we get serious about the by-laws you ignored Michael could not have been on the ballot due to your negligence

Next violation. Please review the by-laws, but my reading indicates that the only nominations must be made by the January meeting, with conditions (sec. 8.2). You allowed a floor nomination

that was entirely outside the by-laws of DOD! So again, you failed to do your duty as an officer of DOD, So, the most nefarious Republican operative could not have done much more to destroy this vibrant group of Democrats than you have done."

The foregoing Richardson email violates the Code in multiple respects.

[I] It makes several false statements of fact, (lies) which are identified below.

[II] The words and tone of the Richardson email violate the Code which expressly prohibits "slurs, jokes, insults, epithets, gestures, or teasing" in any format, including, specifically, "RCDP-related calls, texts, emails, and social media like Facebook, Instagram, and Snapchat."

False Statements (Lies) In The Richardson Email

[1] Richardson states:

"... you are out of DOD for good and good riddance."

I am a fully paid member of the DOD. Despite what she may believe, Richardson has no power or authority to expel me from the Club.

[2] Richardson states:

"your "Attorney at Law" moniker on all your communications is stupid, arrogant, and just a joke to me as I have been surrounded by multiple attorneys in my family as well as having a total social circle of attorneys. Come on - this is a totally pathetic little addition to your signature and means nothing."

I have never used my professional email address or identified myself as an attorney in connection with the conduct of any business of the DOD. Richardson's statement is a lie, a pure fiction taken out of the thin air. Further, her insults against me and my honorable profession ("stupid, arrogant, and just a joke . .

is a totally pathetic little addition to your signature and means nothing.") are transparent violations of the Code's prohibition against "slurs, jokes, insults and "teasing." I make no comment on Richardson's long harangue about her past high school, college and work experiences, which are completely irrelevant to any issue in this matter.

[3] Richardson states:

"Last fall on a zoom meeting where Will Rollins took his precious campaign time to do a zoom meeting for DOD there were only twelve people at the meeting - what a waste of time for him!"

Will Rollins is my friend and professional colleague. Zoom was the only way for our Club to conduct membership meetings during the COVID restrictions and cautions. His staff requested Will be allowed to address DOD members at multiple Zoom meetings.

Further, there was never a membership meeting attended by only 12 people. That is another pure fiction (lie). Finally, no matter how many people may have attended any particular member Zoom meeting, it was my duty to present important Democratic candidates to DOD members, which I faithfully and in good faith always did.

[4] Richardson states:

"At the February 25 meeting of DOD you violated at least three of the by-laws of DOD which you pretended to represent. Please review Section 8.2 about nomination of candidates. As I read it, Michael Finland's nomination as a candidate is not valid, as it was not accompanied by written or verifiable oral confirmation that he will serve - frankly, from my standpoint - I like Michael and appreciate his dedication - but you, Stephen, need to know that you undercut your preferred people when you don't understand/follow/respect the DOD by-laws. If we get serious about the by-laws you ignored Michael could not have been on the ballot due to your negligence."

Where do I begin to address this rant? I do not “pretend” to represent anything. To the best of my ability, I sought to follow the RCDP and DOD By-Laws as well as keeping in mind the basic fundamental of democracy and due process.

There is a back story relating to Michael Finland’s nomination which I will not share here for the sake of brevity. However, I will state that Michael specifically asked to be nominated as Vice President, a position he has more than earned over the past 4 years. His wish and my recommendation were expressly communicated to the *ad hoc*, self-appointed “nominating committee” (Richardson, Maxwell and Dori Smith) which proceeded to completely ignore him and, instead, nominated an individual who had been a member of the DOD a much shorter time, but who is a close personal friend of the nominated incoming president (*i.e.*, cronyism). Richardson’s email is also a personal attack and insult, not only on me, but on Michael Finland, for which she should be ashamed.

Finally (and most telling), who the hell are “preferred people?” What is a “preferred person?” The DOD is a democracy, not an autocracy. Offices are filled by elections, not by appointment or recommendation. Michael Finland had every right to seek election as Vice President, which he did properly and successfully. Stating he should not have been on the ballot in deference to anyone’s personal wishes or preferences is insulting and fascist.

[5] Richardson states:

“So, the most nefarious Republican operative could not have done much more to destroy this vibrant group of Democrats than you have done.”

Do I need to deny being “the most nefarious Republican operative?”

Having been a Democratic activist since I was 14 (I am now almost 78), campaigning for Senator Phil Hart in Michigan, having run for public office as a Democrat multiple times, I have nothing more to add.

DOD BY-LAWS AND PROCEDURES

Since Richardson and my other detractors wish to rely on hyper-technical and microscopic examination of the DOD By-Laws, I feel compelled to point out

that 4 of the committee chairs “recommended” by the *ad hoc*, self-appointed “nominating committee” (Richardson, Maxwell and Dori Smith) and elected on February 25, 2023, were not eligible to hold their offices. The following individuals had not paid DOD dues at least 60 days prior to February 25, 2023: **Stephen Heslin, Geno Sexton, Janine Gregory, Yurema Arvizu**. (DOD By-Laws, Section 3.2 *et seq.*) *I do not here challenge their election.* I make this point to underscore the obvious hypocrisy of those who cite DOD by-law provisions to enforce them against their perceived opponents (Finland and me) but then ignore them for to suit their own agendas.

FORMAL COMPLAINT

This is a formal complaint against Priscilla Richardson and against anyone else whom, upon investigation, is found to be behind the Richardson email at issue. My complaint is that the Email violates the multiple prohibitions of the RCDP Code of Conduct as set forth above.

I demand the RCDP immediately undertake an investigation of this matter and take prompt and significant substantive disciplinary and corrective action against Richardson and any other persons founds to have violated the Code.

_____/s/_____

Stephen R. Jaffe