California Democratic Party Rules Subcommittee on Chartered Organizations Agenda
Thursday, November 12, 2026 at 6:00pm

I. **Roll Call**

II. **Meeting Called to Order**

III. **Adoption of Meeting Agenda**

IV. **Glenn Glazer Proposal language to reformat and other organizational improvements to Appendix C (Chartering of Organizations)**

Exhibit A

V. **Notice of CRC Decision - Riverside DCC against the California Democratic Council**

Exhibit B

VI. **Statewide Chartered Organizations Annual Report Notice**

A. Submission Form Due February 7, 2027

VII. **Adjournment**

EXHIBIT A

Appendix C: Chartering Organizations Guidelines

Chartering Organizations Guidelines

Adopted Jan 28, 2006 by the Rules Committee and Amended June 9, 2022

1. **GOVERNING BYLAWS**: These guidelines are extensions and clarifications of Article X and considered included herein.

~~1.~~ 2. **AUTHORITY**: ~~These Guidelines are proposed pursuant to the Bylaws of This Committee, Article X, Section 4, which provide that~~ Charters ~~for organizations which include in any part of their name the name of the Democratic Party, and, directly or indirectly solicit funds in the State of California for any purpose whatsoever under the representation, either express or implied, that the funds are being solicited for the use of the Democratic Party~~ shall only be granted upon recommendation of the Rules Subcommittee on Chartered Organizations to the Rules Committee pursuant to Article X and these guidelines as adopted by the Rules Committee.

~~2.~~ 3. **PURPOSE**: The purpose of these proposed guidelines is to:

A. Develop a systematic method for considering applications for Charter and provide criteria for weighing the qualifications of applicants requesting Charter,
B. Describe how This Committee assumes the primary responsibility of Chartering Statewide Democratic Organizations,
C. Maintain County Central Committees as the primary authority for chartering organizations on the local level,
D. Allow for the chartering of one State Chartered Organization in each district or area whose primary purpose is political organizing on the precinct level and engagement in electoral political activity, all in the best interests of the California Democratic Party,
E. Foster a clear delineation of responsibility between organizations and avoid organizational conflict, and,
F. Allow for an objective measure of the progress and efforts of State-Chartered Organizations in the performance of their purpose, through written reports.

~~3.~~ 4. **GRANTING**:

A. The following guidelines shall apply to the chartering of all organizations:
   ~~1. All organizations desiring to be chartered by This Committee shall make application for such charter in writing,~~
   ~~2. Charters shall only be granted by This Committee upon recommendation of the Rules Committee pursuant to the guidelines for the Chartering adopted by them,~~
   1. All of the rules set forth in Article X, Sections 2 and 4.
   ~~3.~~ 2. The application ~~shall be on a form provided by the Secretary of This Committee and~~ referenced in X.4 shall contain such information as may be required by the Rules Committee, including, but not limited to:
      a. The name of the organization;
      b. A copy of the Constitution and By-Laws of the organization, and if applicable, its Articles of Incorporation;
      c. A Statement of Purpose and Intended Activity, and means of effectuating same, as well as the objective, measurable standards

by which the Organization shall evaluate its success each year;

d. An agreement that the Organization shall provide the Secretary of This Committee and the Lead Chair(s) of the Rules Committee a written report on the Organization's activities and progress towards fulfillment of the Organization's purposes, as evidenced through objective measures or standards, and a complete "Roster of Members" containing the names, addresses, and phone numbers of all its members, noting whether a particular member has organizational responsibility for a particular activity, on an annual basis, no later than February 7th of each year. Copies of all reports shall be distributed to the members of the Rules Committee no later than February 22nd of each year;

e. An agreement by the organization that it will give ten (10) days written or electronic notice of any and all of its meetings, both regular and special, to the Secretary of This Committee, who shall distribute such notice to the Lead Chairs of the Rules Committee;

f. The names, addresses, and phone numbers of the organization's officers which shall include as a minimum a chair and a treasurer, and which the organization shall agree to keep current and advise This Committee of any changes therein;

g. The names, addresses, and phone numbers of all persons listed on the Statement of Organization;

h. The organization's Federal Election Committee identification number;

~~h.~~ i. ~~The~~ If the organization is required by law to have identification number(s) used by the organization when filing statements with the Secretary of State~~,~~ or the Federal Fair ~~Political~~ Practices Commission, ~~and/or the Federal Elections Committee~~ then those numbers are required;

~~i.~~ j. A written certificate signed by the Chair and one additional officer of the organization, certifying that the Organization has at least thirty (30) members in good standing and that each of its members is a registered Democrat;

~~j.~~ k. The above subsections ~~a-i~~ a-j shall constitute the annual report, as referred to in Section ~~4.B.9~~ X.4.B.9, and;

~~k.~~ l. Indication of payment of a charter fee in the sum of $50.00.

~~4. This Committee shall only charter organizations having as their objective the advancement of the Democratic Party,~~

~~5. Chartered Organizations are intended to be independent of the California Democratic Party and not "affiliated" therewith, as that term is defined by the Bipartisan Campaign Reform Act and other applicable State and Federal laws, rules and regulations. This Committee shall not engage in any activities that directly or indirectly establish, finance, maintain, or control any organization chartered under this Article,~~

~~6.~~ 3. ~~Any Charter which has been granted by This Committee shall be effective from the date said charter was granted until the second meeting of the~~

~~Executive Board held following the regular election of Statewide Officers of This Committee in the year immediately following the conclusion of a Presidential election year, or, until revoked for cause as set forth herein.~~ An organization's charter which has expired or been revoked shall be required to reapply using the guideline set forth above in Section ~~3.A.3~~ 4.A.2 in order to continue as a chartered organization.

~~7.~~ 4. Applicants for charter shall exhibit a demonstrated commitment to inclusion and have a clear history of dedication to Democratic Party principles and practices, and shall maintain said qualities in all of their activities,

~~8. In considering whether to recommend granting or rejecting an application for Charter, the Rules Committee will, among other factors, consider whether or not there are existing organizations serving the same or similar purposes and/or jurisdiction chartered by This Committee or other authorities, and whether recommending granting or rejecting the application would be in the overall best interests of the Party, under the circumstances.~~

~~9.~~ 5. In the event competing applications for chartering are presented, weight shall be given to the number and geographic distribution of members in the organization and to the scope of the plan for political organizing and activity, with emphasis on voter registration, voter turn-out activities, promotion of candidates, and such other factors that promote the interests of the Democratic Party and the election of Democrats. The Rules Committee shall attempt to facilitate the merger of such competing groups.

~~10.~~ 6. Organizations applying for Charter must state in their bylaws that they subscribe to the principles set forth in the General Provisions of the Bylaws of This Committee and its Code of Conduct, and,

~~11.~~ 7. In all of its proceedings, This Committee, and all of its subordinate bodies, shall observe the basic due process rights of notice, written response, representation, and a right to be heard via written testimony, reserving the right to set reasonable rules, methods and timetables regarding same; This Committee, or any of its subordinate bodies involved in this process, may issue an invitation to submit oral testimony provided a similar invitation to submit oral rebuttal thereto is also extended.

B. District and Area Organizations

1. This Committee shall not charter more than one District or Area based organization ~~in a particular~~ representing identical geographic ~~area~~ areas.
2. A presumption shall exist in favor of chartering organizations whose geographic area is inclusively defined as the boundaries of a legislative district.
3. The organization shall, in its bylaws and application for charter, indicate that its primary purpose is to actively engage in political organizing on the precinct level as well as other forms of electoral political activity.
4. All members of This Committee's Executive Board resident in the geographical area concerned shall be provided written or electronic notice

of intent to consider an application for charter and be invited to provide written testimony either in support or opposition to the application. In its discretion, This Committee, or any of its subordinate bodies considering the matter, may invite oral testimony, provided all interested persons are accorded the same right.

5. The Roster of Members of a District or Area Organization shall be made available by This Committee to all candidates that This Committee endorses.

C. Statewide Organizations
    1. This Committee shall not charter more than one chartered organization representing or sharing substantially similar interests;
    2. The Chairs of Caucuses certified under Article III, Section 9, of the Bylaws of the CDP shall be given written or electronic notice of any application for charter by a Statewide Organization representing or sharing substantially similar interests as their caucus, and shall be invited to submit written testimony either in support or opposition to the application. In its discretion, This Committee, or any of its subordinate bodies considering the matter, may invite oral testimony, provided all interested persons are accorded the same right.

D. ~~Democratic~~ Clubs
    1. This Committee shall refrain from chartering organizations whose primary purpose is to function as a local "traditional Democratic Club," leaving such responsibility to County Central Committees, unless the local County Central Committee either does not charter organizations, or does not exist. However, in the event a local County Central Committee has declined to charter an organization, or delayed such charter for an unreasonable period of time, This Committee shall consider such application for charter. Such application ~~Must~~ must include a clear explanation and/or documentation of the extraordinary circumstances justifying the intervention of This Committee in what is generally considered a local County Central Committee function. The County Central Committee Chair and Executive Board representatives of said county (if any) shall be given written or electronic notice and invited to submit testimony to the Rules Committee. In its discretion, This Committee, or any of its subordinate bodies considering the matter, may invite oral testimony, provided all interested persons are accorded the same right;
    2. When considering an application for charter of any organization that a local County Central Committee has declined to Charter, a rebuttable presumption shall exist in favor of the local County Central Committee's action.
    3. Prior to granting any charter under the provisions of this section, a specific finding of one of the following circumstances shall be made:
        a. No County Central Committee is organized in the relevant county,
        b. The County Central Committee in the relevant county has a policy of not issuing such charters, or

c. Extraordinary circumstances exist.

E. Councils of Democratic Clubs
   1. This Committee acknowledges the Charter previously granted to the California Democratic Council in 1952, which organization shall be exempted from these guidelines, except with regard to those pertaining to revocation of charter;
   2. This Committee may charter additional Statewide Councils of Democratic Clubs representing or sharing substantially similar interests, consisting of at least 3 individual clubs that have been chartered by This Committee or local County Central Committees, and are geographically diverse.

~~4.~~ 5. REVOCATION

A. This Committee shall have the power and authority to deny or revoke a charter of any CDP Chartered Organization~~,~~ for cause by a majority vote of This Committee.

B. ~~Cause~~ Causes for revocation ~~includes~~ include, but are not limited to:
   1. ~~Having fewer than thirty (30) members in the geographical area from which the organization draws its membership,~~
   2. ~~Failing to grant membership to any registered Democrat who seeks to join and is resident in the geographical area from which the organization draws its membership,~~
   3. ~~The knowing enrollment of a person registered as anything other than a member of the Democratic Party as a voting member of the organization,~~
   4. ~~The endorsement of a non-Democrat for elective office,~~
   5. ~~The endorsement of any candidate for public office running against an endorsed candidate of This Committee, by any organization granted a Charter by This Committee after the adoption of this Article X on July 31, 2005, (NOTE: This Committee previously granted a Charter to the California Democratic Council in 1952, prior to This Committee's authority to endorse candidates and prior to the adoption of the Chartering rules contained herein, and the California Democratic Council is specifically exempted from this possible grounds for revocation of Charter),~~
   6. ~~Transferring of funds from the organization's accounts to an account of a non- Democrat running for elective office,~~
   7. ~~Acting in violation of State or Federal laws or regulations,~~
   8. ~~A finding of fact having been made by This Committee that the organization has failed to act in, and/or has acted in a manner adverse or detrimental to, the best interests of the Democratic Party,~~
   9. ~~A finding of fact having been made by the Organizational Development Rules Committee and concurred in by the Executive Board of This Committee that the organization has failed to act in, and/or has acted in a manner adverse or detrimental to, the best interests of the Democratic Party, including but not limited to:~~
      a. ~~A failure to adopt or maintain the Code of Conduct as part of its own bylaws with a provision that each member is bound by it terms, and/or~~

~~b. A willful, intentional, or repeated failure to address violations of the Code of Conduct within the organization.~~

1. Any of the causes listed in Article X, Section 3,

~~10.~~ 2. Failure to submit the annual written report referred to above shall create a rebuttable presumption of having failed to act in the best interests of the Democratic Party, provided written notice of the deficiency has been served by certified mail on the Chair of the Organization at the address last provided to This Committee and 15 days opportunity to correct the deficiency has been given. Submission of the deficient report within the given 15 days shall be considered evidence of compliance with the above report requirements.

C. In the event the Compliance Review Commission does not exercise jurisdiction under Article XI, Section 2,a, over a complaint concerning the chartering of an organization, and upon written complaint signed by thirty (30) members of the Executive Board, or any three (3) State-wide officers of This Committee, the Rules Committee may institute Charter Revocation hearings and shall issue a written report of its findings and recommendations, as well as the reasons therefore, to the Executive Board of This Committee for further action.

~~D. No organization's charter may be revoked for cause without sixty (60) days written notice of grounds of revocation having been mailed to the Chair of the organization in question, and the rights of response before This Committee having been granted to said organization's designated representative. For purposes of this section the Chair shall mean the last person designated in writing to This Committee as Chair.~~

~~E. The Charters of geographically based organizations shall be automatically revoked thirty (30) days after the passage of any reapportionment law altering the boundaries of that organization's defined district boundary becomes final.~~

~~5.~~ 6. TEMPORARY SUSPENSION OF CHARTER

A. During the period 120 days prior to any Primary or General Partisan Election, the Compliance Review Commission may, upon written request by the Chair of This Committee, issue an Order of Temporary Suspension of Charter, for a period of thirty days, of any charter issued by This Committee, for alleged violation of any of the above provisions, provided the request of the Chair of This Committee for suspension sets forth in writing the reasons therefore, and said request is served on the Chair of the Organization in question at their last known address of record on file with This Committee, the Secretary of This Committee, and the Chairs of the Rules, Credentials, and Organizational Development Committees of This Committee. In the event of the issuance of an Order of Temporary Suspension of Charter, the Compliance Review Commission shall also issue an Order to Show Cause why the suspension should not become permanent and request written argument thereon be submitted to the Secretary of This Committee within ten days, after which the Compliance Review Commission may take action under Section ~~6~~ 5 herein, including the issuance of an Order of Revocation of Charter or rescission of the Order of Temporary Suspension of Charter.

EXHIBIT B

M E M O R A N D U M

TO: All Interested Parties

FROM: Compliance Review Commission (CRC)

DATE: June 15, 2026

RE: **COMPLIANCE REVIEW COMMISSION (CRC) DECISION RELATING TO A CHALLENGE FILED BY RIVERSIDE COUNTY DEMOCRATIC PARTY (RCDP)**

INTRODUCTION:

On March 3, 2026, Joy Silver, Chair of the Riverside County Democratic Party, filed a challenge against the California Democratic Council (CDC) regarding alleged ongoing violations. The challenge alleges that the CDC maintains a bylaw provision allowing a formerly chartered club, Democrats of the Desert (DOD), to remain affiliated with the CDC after relinquishing its charter with the RCDP. The RCDP asserts that the CDC's actions constitute conduct "adverse or detrimental to the best interests of the California Democratic Party," claiming violation of Article X, Section 3.a.(8) of the CADEM Bylaws covering the Denial and Revocation of Charters.

The challenge claims that the CDC's bylaws Article IV, Section 2.B.5. allows clubs that "decide to dissociate for cause" from their County Central Committee to retain CDC affiliation. The RCDP argues this loophole undermines its exclusive authority to charter clubs under Elections Code section 20201. Further claiming that retaining CDC affiliation, the unchartered DOD continues to use the name "Democrats" to solicit funds and hold itself out as a Democratic Party affiliate, which the RCDP claims diminishes its own efficacy and harms its coalition of chartered clubs.

The RCDP requested the following Remedies:

1. Direct the CDC to amend its Bylaws, within 60 days, to remove any clause, specifically Article IV, Section 2.B.5., that allows formerly chartered clubs to become or remain affiliated.
2. Direct the CDC to disaffiliate DOD and any other organizations not appropriately chartered by a Democratic County Central Committee.
3. Revoke the CDC’s charter if it fails to comply with the directive within 60 days.

California Democratic Council (CDC) Response

The California Democratic Council (CDC) objects to the Riverside County Democratic Party’s (RCDP) effort to revoke its alleged CADEM charter, arguing that no charter has been produced and therefore CADEM and its Compliance Review Commission lack jurisdiction to proceed.
The CDC contends that:

1. No valid charter has been shown to exist.
2. Required revocation and notice procedures cannot apply without a charter.
3. CADEM cannot regulate the CDC's internal governance absent proof of a charter.

Regarding Democrats of the Desert (DOD), the CDC states that DOD is an affiliate, not a chartered organization, and that California law governs the use of the term Democrat. The CDC also requests documentation proving the existence of a charter and questions why CADEM previously declined to intervene in the DOD dispute but is now allowing the challenge to move forward.

The CDC shared an exhibit of a Letter from an attorney on behalf of the CDC asserting that California law allows unaffiliated groups to use the term Democrats in their names and fundraising, provided they do not mislead the public. The DOD stated it would clearly disclose its affiliation with the CDC, not CADEM or the RCDP.

DOCUMENTS INITIALLY RECEIVED AND REVIEWED:

Documents received and reviewed by the CRC associated with the challenge included the following:

1. Challenge submitted by Riverside County Democratic Party on March 3, 2026, and 4 supporting documents

    a. Exhibit 1 – January 19, 2026 Email from RCDP to CDC
    b. Exhibit 2– January 26, 2026 Letter RE: Riverside County Democratic Party and Democrats of the Desert to CDC
    c. Exhibit 3 – Constitution and Bylaws of The California Democratic Council
    d. Exhibit 4 – February 7, 2026 DOD Email Soliciting Donations

2. Testimony submitted by Former DOD member and member of RCDP Michael J. Finland, Suellen Chodash and Freya Foley, RCDP Vice Chair, Agi Kessler, Communications Chair of RCDP Lou La Monte, DOD members Becki Robinson and Emily Vogt, and Florice Hoffman, Chair DPOC in support of the challenge

3. Testimony submitted by Norma Alcala, Chair of the California Democratic Council, and Marcie Maxwell, President of Democrats of the Desert in opposition to the challenge.

TIMELINESS:

According to CDP Bylaws, Article XII, Section 2:

> "All challenges must be commenced by the filing of a written challenge with the Secretary of This Committee, with copies served on the Chair of This Committee, as

well as the appointing person, and the chair of the relevant organization, where applicable no later than seven (7) calendar days after the alleged violation occurred. Upon a showing of good cause, sustained by unanimous vote, the Compliance Review Commission may waive this requirement."

(All By-Law references are to the California Democratic Party Bylaws, as amended through October 2025, unless otherwise indicated.)

Given the ongoing nature of the violations reported, the CRC found no basis for concluding that the submission was late.

JURISDICTION:

Article XII, Section 2.a(1) of the CDP Bylaws states:

> "The Compliance Review Commission shall have initial jurisdiction over all challenges and/or appeals arising under these Bylaws."

Further, the CRC Procedural Rules, Section 2, B. state in pertinent part that a challenge must,

> "Explain[] the basis of CRC's jurisdiction… If the CRC cannot discern the section of the CDP Bylaws alleged to have been violated or which grants jurisdiction to the CRC, it may dismiss the challenge."

CADEM Bylaws, Appendix C: Chartering Organizations Guidelines, Section 4, states:

4. REVOCATION

- *A. This Committee shall have the power and authority to deny or revoke a charter of any CDP Chartered Organization, for cause by majority vote of This Committee.*
- *B. Cause for revocation includes:*
  1. *Having fewer than thirty (30) members in the geographical area from which the organization draws its membership,*
  2. *Failing to grant membership to any registered Democrat who seeks to join and is resident in the geographical area from which the organization draws its membership,*
  3. *The knowing enrollment of a person registered as anything other than a member of the Democratic Party as a voting member of the organization,*
  4. *The endorsement of a non-Democrat for elective office,*
  5. *The endorsement of any candidate for public office running against an endorsed candidate of This Committee, by any organization granted a Charter by This Committee after the adoption of this Article X on July 31, 2005, (NOTE: This Committee previously granted a Charter to the California Democratic Council in 1952, prior to This Committee's authority to endorse candidates and prior to the adoption of the Chartering rules contained herein, and the California Democratic Council is specifically exempted from this possible grounds for revocation of Charter),*

6. *Transferring of funds from the organization's accounts to an account of a non-Democrat running for elective office,*
7. *Acting in violation of State or Federal laws or regulations,*
8. *A finding of fact having been made by This Committee that the organization has failed to act in, and/or has acted in a manner adverse or detrimental to, the best interests of the Democratic Party,*

As the complaint questions the rights and obligations with regard to the use of the name Democrat or Democratic of an organization that is chartered by the California Democratic Party, the CRC finds that it has jurisdiction.

STANDING:

According to Article XII, Section 3:

> "Any party to a challenge must be adversely affected to bring the challenge."

The Riverside County Democratic Party (RCDP) was the chartering authority of the recently disassociated club, Democrats of the Desert (DOD), that affiliated with the CDC; thus, the CRC finds that RCDP has standing as they were adversely affected.

FINDINGS:

The CRC takes adherence to the California Election Code very seriously. The California Democratic Party must be sure that our County Parties, Chartered Organizations, and Clubs follow the law in all their activities. Election Code 20201 is quite specific as to what processes must take place to allow an organization to use the term "Democrat" or "Democratic" for the purposes of fundraising in the State of California. Affiliation with the CDC is not a substitute for following those processes.

The CDC was chartered in 1952 by the California Democratic Party. While there is a specific exception carved out for the CDC on endorsements, it otherwise must follow the rules for Chartered and Affiliated organizations laid out in the Bylaws in Appendix C. It's unclear whether the CDC has notified its affiliates that affiliation does not offer the same rights and abilities as Chartering does pursuant to Election Code 20201.

As a chartered organization of the California Democratic Party, the CDC bears some responsibility for ensuring its affiliates do not use membership as a substitute for proper chartering, particularly where an organization has already relinquished a charter it once held.

This ambiguity has real consequences. When an unchartered organization, like the DOD, usurps the appropriate means of chartering and relies on CDC affiliation to use the Democratic Party brand, it undermines the ability of county committees and the state party to enforce the requirements for charters. Allowing affiliation to serve as a de facto substitute without ensuring organizations are acting in the best interest of the party erodes the Party's organizing efforts and undermines the integrity of the California Democratic Party itself.

ORDER:

Based upon the above facts and the Bylaws of the CDP, the CRC makes the following Order:

1. The CRC, through this motion, clarifies that neither the DOD, nor other similarly situated organizations may raise funds using the name "Democrat or Democratic" without first complying with Election Code § 20201 (2025). Further, we direct staff to notify all 58 county chairs that using the title of Democrat or Democratic in the name of an organization that solicits funds is a permission that must be specifically granted by the County Committee or the State Party per CA Elec Code § 20201 (2025) and may be rescinded.
   Further, we direct the party to take any action necessary, including legal action, to protect its interest in this regard.
2. The CRC directs the CDP Rules Committee to undertake a review of the status of chartered and affiliated organizations to the CDP, including the CDC, to determine whether the historic status of these organizations meets today's needs and purposes of the party.

Appeal of this order, if any, must be filed with the CDP Secretary, with copies to the Chair of the CDP State Central Committee, within twelve days of the date of this decision. Thus, any appeal must be filed on or before June 27, 2026 with the Sacramento office of the California Democratic Party, and shall be an appeal to the next meeting of CDP Rules Committee upon conclusion of the response period.

Please note that per CDP Bylaws, Article XII, Section 2e, the filing of an appeal shall not stay any decision of the CRC. Parties may additionally respond in person or virtually, depending on how the meeting is being conducted, if so desired, provided there has been a timely filing of an appeal and notice of intent to testify is provided in writing to the Lead Chair of the Rules Committee by 5 PM on Saturday, June 27, 2026, at the Sacramento office of the California Democratic Party. The Rules Committee may accept such additional testimony, written or oral, considering the nature and import thereof, as well as the time available for its proper consideration, as it deems appropriate, in its discretion.

Accordingly, this decision is so ordered, and is in effect, unless, and until, a successful appeal is made, decided, and contrary orders made whether by the CRC, or by the Rules Committee. CRC shall retain jurisdiction up until the time of an appeal, if any, is heard by the Rules Committee.

Respectfully submitted by a 3-0 vote of the members of the CRC,

Tim Allison, Co-Chair, Credentials Committee
Valeria Hernandez, Co-Chair, Rules Committee
Jane Wishon, Co-Chair, Credentials Committee

Paul Seo, Credentials Committee, was not in attendance and did not participate in the deliberations on this matter or vote on the results

Laurence Zakson, Vice-Chair, Rules Committee, recused himself and did not participate in the deliberations on this matter.

Memorandum

To: CADEM Rules Committee
From: Glenn Glazer, Chair of the Chartered Organizations Subcommittee
Date: August 1, 2026
Subject: CRC Directive to the Rules Committee

This memorandum strictly concerns item 2 of the CRC order regarding the RCDP and the CDC and is independent of the issues involving the latter. Item 2 states: "The CRC directs the CDP Rules Committee to undertake a review of the status of chartered and affiliated organizations to the CDP, including the CDC, to determine whether the historic status of these organizations meets today's needs and purpose of the party." . The remaining items, pursuant directly to the findings regarding the CDC are out of scope for this memorandum.

There are many things wrong with this directive.

Purpose of Chartered Organizations

Article X Section 2.b. states: "Chartered Organizations are intended to be independent of the California Democratic Party and not "affiliated" therewith, as that term is defined by the Bipartisan Campaign Reform Act and other applicable Local, State and Federal laws, rules and regulations. ***This Committee shall not engage in any activities that directly or indirectly establish, finance, maintain, or control any organization chartered under this Article.***" (emphasis mine)

Contrasted to caucuses, the entire purpose of chartered organizations to allow groups to use our name and mark without being affiliates with the party in a way that satisfies BCRA criteria of independence and thus have wide-ranging freedom based on the fact that they are independent, not subordinate organizations. The directive acts as if they are subordinates, violating the prime reason groups chose to be chartered organizations and not caucuses and dismisses all of the work they do to maintain their own finances and reporting in order to achieve their independent status.

We should not, as Article X enjoins us, be engaging in activities to control the chartered organizations beyond the purely mechanical requirements listed there or obviously egregious behaviors also mentioned there like endorsing a non-Democrat.

Powers of the CRC

From Article XII, Section 3.f (4), under Duties of the CRC, the disciplinary methods the bylaws recommend to the CRC are: "a. Private Admonishment; b. Public Admonishment; c. Suspension of Rights

for a time period not to exceed 180 days; d. Removal from Office; and/or e. Removal from Membership."

Note that all of these are personal in scope, intended to be applied to defendants (as individuals or as groups) in these actions. Other than weak escape clauses like "but not limited to", there is absolutely nothing in the article that grants the CRC the power to direct the Rules Committee, or in fact, any Standing Committee to do anything.

This is amplified by the language in Appendix D, Section 5 b, Powers: "Regardless of whatever remedy may be requested by the Proponent(s) of a challenge, CRC, as noted above, has the power and authority to take such actions as are necessary to provide a fair and just remedy including, but not limited to the holding of new elections and is not limited by the request, and may impose lesser or greater remedies than requested."

This is also clearly aimed at remedies directed at a misbehaving person, caucus or chartered organization, not at a Committee which does not, for example, hold elections.

Permitting this commanding directive to stand sets a terrible precedence of overreach and should be blocked on these grounds alone.

Further, the remedy proposed in item 2 is, to use the language of Appendix D, neither fair nor just. It asserts that because one member of a group did something wrong, all members of the group are suspect. This is the foundation of prejudice and as Democrats should we be better than that. This directive is both anti small 'd' democratic as well as a violation of big 'D' Democratic principles. Many of the CADEM chartered organizations have operated for years and even decades without issue and it is wrong to subject them to a fishing expedition that they in no way deserve.

<u>Lack of Understanding and of Objective Criteria</u>

"…to determine whether the historic status of these organizations meets today's needs and purpose of the party."

In the first place, of the eleven organizations, only two or three qualify for "historic" and in fact, two were chartered in the last year. Chartering is a living, ongoing process, not some artifact of antiquity. This notion is especially strange given recent attempts to motivate caucuses to become chartered organizations. What this says is that the directive does not really understand the nature of the organizations it is attempting to control.

Similarly, chartered organizations are *not* affiliates of the party in the BCRA sense, per the Purpose section above.

The more worrisome part of this statement is that this criteria is completely and utterly subjective. As Democrats, we pride ourselves on being a big tent, of being diverse of kind and thought, and with that comes a wide variety of thoughts about what the needs and purpose of the party are. If this is to be left

to party leadership to determine this, the optics alone of a top-down crushing on charters is terrible. The bylaws and appendices provide clear and most importantly, objective criteria for a denial or revocation of charter, which is how it should be, and not “well, someone high up doesn’t want your group around anymore” or more subtly, curating “requirements” that do the same thing.

Organizational Burden

Should we incorrectly choose to act on this directive, this will create an enormous amount of unnecessary work for a lot of people.

Staff will have to create a tracker, organize and host several meetings of the Subcommittee to review each existing charter, and produce minutes and other documentation. If a charter should choose to contest or appeal this decision, there will be even more rounds of meetings after that. We all appreciate the fine work staff does and one way to show that appreciation is to not burden them with unnecessary work.

Similarly, the Subcommittee will have to invest time in re-reviewing everything after having just finished a review cycle. The Subcommittee members did their tasks and I’m proud of their work. I would feel terrible asking them to redo all of it just because of a dispute with a single charter. It’s not fair to the work they put in to put them through this all over again.

Conclusion

Based on the vagueness of the directive, the lack of authority of the CRC to command the Rules Committee, and the directive’s violation of the Article X constraints on the Committee interfering with chartered organizations, I strongly urge the Rules Committee to ***reject*** the CRC directive in item 2 completely