



January 24, 2019

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Re: Alabama DNC Credentials Committee Challenges

Dear Parties,

We write in regard to the Consolidated Challenges to the credentialing of Nancy Worley and Randy Kelley, Chair and Vice Chair of the Alabama Democratic Party (“Challenged Parties” or “Respondents”), as members of the Democratic National Committee.

Following the receipt of Chair Worley and Vice Chair Kelley’s written answer to the challenges on December 3, 2018, the Credentials Committee deferred this matter to the State Democratic Executive Committee of Alabama (“SDEC”) until January 4, 2019, pursuant to Rule of Procedure of the Credentials Committee (“Rule”) 6(E)(1), for it to investigate and adjudicate the challenges and notify the Credentials Committee of its decision. SDEC has failed to notify the Credentials Committee of any actions it has taken to adjudicate these Challenges since the matter was deferred on December 3, 2018, apart from its indication that the Challenged Parties have offered to mediate with the Challengers. Following the deadline for SDEC to adjudicate the Challenges, both sets of Challengers appealed the SDEC’s failure to adjudicate their Challenges on their merits to the Credentials Committee pursuant to Rule 6(E)(4).

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While Appellant Young contends that the Challenged Parties' answer was incomplete and therefore that they are in default, the Challenged Parties have raised factual allegations in their written answer that materially conflict with the facts alleged in the two Challenges. Therefore, we have determined that these Challenges cannot be resolved based on the parties' written submissions alone and that the Credentials Committee must instead conduct an evidentiary hearing pursuant to Rule 6(G).

In order for the Credentials Committee to consider this Challenge when it convenes on February 14, 2019, we have scheduled an **evidentiary hearing for February 11, 2019, at 9:00 AM, in Washington, D.C.** and have selected Michael K. Lewis of Washington, D.C. to serve as Hearing Officer at the hearing. Mr. Lewis, a Democrat, is an experienced arbitrator and attorney. Mr. Lewis will determine and notify the parties of a pre-hearing schedule, work with the parties to collect necessary evidence, inform the parties of hearing procedures, preside over the hearing, and present the Credentials Committee with his findings of fact in a written report based on the evidence presented by the parties at the hearing, all in accordance with Rule 6(G).

We understand that the Challenged Parties have proposed to Mr. Rubio and Mr. Rouco that their clients' Challenge be resolved through mediation. The Credentials Committee welcomes the parties' willingness to explore resolving this dispute prior to the hearing and reminds the Challenging Parties that they are free to withdraw their challenges at any time if mediation resolves this dispute to their satisfaction. Additionally, if the parties would prefer, the parties may elect to also engage in non-binding mediation with the assistance of Mr. Lewis as mediator, pursuant to Rule 6(G)(1), on February 11, 2019, prior to the beginning of the evidentiary hearing. However, should these challenges not be resolved through mediation and withdrawn, the Credentials Committee will proceed immediately to resolve these challenges with the assistance of the evidence collected by Mr. Lewis at the hearing during its meeting at **10:30 AM on February 14, 2019.**

During the February 14, 2019, meeting, each group of Challengers will be entitled to 15 minutes of oral argument in front of the Credentials Committee and Respondents will be entitled to 30 minutes of oral argument in front of the Credentials Committee. *See* Rule 6(H)(2). All parties may be represented by counsel during the oral argument if they so choose, though only two representatives are permitted to speak during each side's argument.

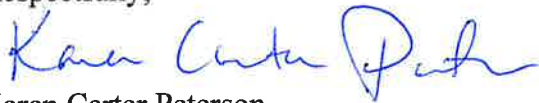
Following each side's oral argument, the Credentials Committee will debate the Challenges for a period of up to 30 minutes as necessary, directing any remaining questions to each party's counsel or representative. *See* Rule 6(H)(3). Following debate, the Co-Chairs of the Credentials Committee will recognize a member of the Credentials Committee for the purpose of offering a resolution to dispose of the Challenges. The proposed resolution will be discussed for a maximum of 20 minutes, with time equally divided between proponents and opponents of the resolution.

At the end of the debate, the resolution will be put to a vote. A majority of the present Credentials Committee members must vote in support of the resolution in order for it to be

adopted. *See* Rule 7(E). If the resolution is not adopted, the Co-Chairs of the Credentials Committee will continue to recognize members of the Credentials Committee for the purpose of offering other resolutions to dispose of the Challenges, and the procedures in this paragraph will be repeated until a resolution receives a majority vote. *See* Rule 6(H)(5). The recommendation of the Credentials Committee on how the Challenges should be resolved will then be submitted to the full Democratic National Committee. *See* Rule 6(J).

Thank you for your attention to this matter. Mr. Lewis will be in touch shortly to provide additional information regarding the hearing.

Respectfully,



Karen Carter Peterson



John Currie

Co-Chairs, Credentials Committee

cc: Credentials Committee Members
Michael Lewis, Hearing Officer