



## Bailey Stober, Chair

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**2/13/2018**

Officers

King County Democrats Executive Board

**Dear Officers:**

Please consider this notification to bring charges against Michael Maddux and Orchideh Raisdanai for violation of the King County Democrats Bylaws, King County Democrats Code of Conduct and Roberts Rules of Order Newly Revised 11<sup>th</sup> Edition. I reserve the right to add additional members of the Executive Board to this complaint given I provide them with proper notice and follow due process.

On 2/4/2018, Michael Maddux sent me an email at 4:24pm notifying me that pursuant to the Code of Conduct I was under investigation for allegations regarding "workplace harassment, sexual harassment, and creating of a hostile work environment." He notified me that the Vice Chairs would be conducting an investigation. In the same email Mr. Maddux requested that "you do not go to the Auburn office... Further, we request that you make no expenditures without sign-off from the vice chairs." Lastly, he stated in his email "The Vice Chairs are keeping the contents and specifics of the investigation confidential, and we request that you do the same. We will be in touch with you soon to schedule an interview," he concluded. Ms. Raisdanai co-signed this email.

On 2/5/2018 I emailed Mr. Maddux back and copied the other two Vice Chairs, Cat Williams and Orchideh Raisdanai. In my email I stated that I had received his notification regarding the investigation and that I would cooperate fully and to the best of my ability. I immediately confirmed his promise of confidentiality in the email. I notified the Vice Chairs that since the accuser was no longer an employee of the Party I did not feel I should be banned from using the office to conduct the business of the party. I further noted to Mr. Maddux that nowhere in the Code of Conduct nor the bylaws did it give the Vice Chairs the authority to remove the expenditure authority from the Chair which would prevent me from continuing the business of the Party. I believed and still do that Mr. Maddux intentionally was overreaching in his authority by making an unprecedented request for this to occur. I assume since the other Vice Chair's were copied on the original email they also felt this overreach was appropriate, their names were co-signed on the bottom of the email with the request in it.

I further explained to the Vice Chairs that since the allegations were made against me as an employer I felt it was appropriate to retain legal counsel to ensure the Party was not open to liability if any further claim were to arise from this investigation or allegations.

I noted that I would be happy to meet with the Vice Chairs for my interview at a “mutually agreeable time.”

On 2/7/2018 at 3:11pm. I again received an email from Mr. Maddux. This email stated that the Vice Chairs had investigated me for sexual harassment, workplace harassment, creation of a hostile workplace and they had “concluded that all of the complaints are founded.” He stated “we believe that there is enough information to warrant your resignation as Chair.” He noted he had attached a document with the findings to the email (which he did not) and then asked me to confirm if I would resign as Chair by 7pm the same day, a mere 3.5 hours later. At 5:09 Mr. Maddux sent me a follow up email with the actual attachment he claimed he sent in the first email, still wanting my resignation by 7pm – less than 2 hours later. Mr. Maddux noted he would be calling a meeting of the officers to discuss a course of action. Ms. Raisdanai co-signed this email.

On 2/8/2018 at 8:05am Mr. Maddux emailed [eboard@kcdems.org](mailto:eboard@kcdems.org) with an attached document claiming I had used derogatory language towards staff, pressured staff into consuming alcohol, mispending money, claiming staff was scared due to a lack of funds, and that staff was continuously intimidated by me. Ms. Raisdanai co-signed this email.

## Alleged Violations

### Code of Conduct Violations

1. The code of conduct calls for allegations to be investigated. An investigation is an examination and determination of facts utilizing all available avenues. During Mr. Maddux’s investigation he failed to interview myself, the treasurer or other key parties that have relevant and pertinent information. He has violated the very preamble of the code of conduct which states we resolve these issues “constructively” and with the help of “community” and “community processes.” Ms. Raisdanai has willfully participated in these actions of negligence.
2. Mr. Maddux has violated the anti-harassment policy by promoting and sharing uninvestigated “offensive written comments.” Ms. Raisdanai has willfully participated in these actions of negligence.
3. Mr. Maddux further violates the “Roles” section item number 2 which clearly states “Any complaints shall be submitted to the Ombudsperson, who **shall** distribute any such complaints to the Chair and Vice Chairs for further deliberation and consideration.” To this date I am yet to see a complaint in writing. The rule says shall, it does not leave it up to Mr. Maddux to decide if I get to see a complaint, therefore, enabling me to respond to said complaint.
4. Mr. Maddux attempted to intimidate and bully me with his unreasonable requests. Additionally, he sent a biased memo to the executive board and outside parties in a bullying attempt to force my resignation by tainting the opinion of the board before a fair investigation could be conducted. Ms. Raisdanai willfully participated in these actions.

To date I am yet to be interviewed, key witnesses are yet to be interviewed, and I am yet to see a complaint or allegations in which I can respond to.

## Bylaws Violations

1. Section 5.4 Bullet 7 clearly state “Be the sole authorized spokesperson for the Democratic Party of King County. No documentation will be published or provided outside of the organization without approval of the KCDCC Chair or the designee of the KCDCC Chair.” However, due to Mr. Maddux’s negligence in sending out a memo to a list of people that memo has ended up in press publications across the state. Mr. Maddux is not authorized to speak on behalf of the KCDCC which he attempted to do in putting the Party logo on the document and sending it to a list of people many of which fell outside of the Executive Board. I have independent witnesses who will testify that Mr. Maddux independently told them about the investigation and their findings before he even produced the memo, further violating this bylaw provision. Ms. Raisdanai has participated willfully in this negligent behavior as well.
2. Section 5.4 Bullet 1 clearly states “Be the Chief Executive Officer of the KCDCC and preside at all meetings of the KCDCC, the Executive Board (see [Article VII](#)), and the Leadership Council (see [Article VIII](#)).” Mr. Maddux has repeatedly attempted to hold “secret meetings” of the officers of the Executive Board. Not only is he not entitled to do so, there can be no executive session of a nonofficial meeting which then prohibits the confidentiality of the information discussed. Ms. Raisdanai has participated willfully in this negligent behavior as well.
3. Section 6 of the Bylaws clearly outline the procedure for calling meetings and special meetings. None of these procedures have been followed by Mr. Maddux or Ms. Raisdanai.
4. Section 10.5 clearly states “No money shall be paid from the funds of the KCDCC except by bank transaction through the Treasurer or the Chair. No member other than the Treasurer or Chair may incur a debt or otherwise obligate the King County Democrats for the future payment of funds without approval of the Treasurer, Chair, or Executive Board.” Mr. Maddux attempted to violate this bylaw by demanding that the Chair not be able to make expenditures without his sign off. Mr. Maddux does not have that authority nor has it been granted to him by the Executive Board. Ms. Raisdanai has participated willfully in this negligent behavior.
5. Article 15 clearly states if the issue is not covered in the bylaws or rules it shall be governed by Roberts Rules of Order. Therefore, if Roberts Rules of Order are violated it constitutes a bylaws violation. I will lay out in further detail the Roberts Rules of Order violations that Mr. Maddux and Ms. Raisdanai willfully participated in this negligent behavior.

## Roberts Rules Violations

1. Section 61 Line 20 states “If improper conduct by a member of a society occurs elsewhere than at a meeting, the members generally have no firsthand knowledge of the case. Therefore, if disciplinary action is to be taken, charges **must** be preferred and a formal trial held before the assembly of the society or before a committee – standing or special – which should be required to report its findings and recommendations to the assembly for action.” Mr. Maddux has violated this rule by not allowing a formal trial to be held before his special committee. If a formal trial had been held I would have been interviewed and due process would have been given. Ms. Raisdanai has willfully participated in these actions of negligence.
2. Section 63 Line 1 states “Rights of the Society and the Accused – A society has the right to investigate the character of its members and officers as may be necessary to the enforcement of its own standards. **But neither the society nor any member has the right to make public any**

**information obtained through such investigation;** if it becomes common knowledge within the society it should not be revealed to any persons outside the society. Consequently, a trial **must always be held in executive session, as must the introduction and consideration of all resolutions leading up to the trial.** If (after trial) a member is expelled or an officer is removed from office, the society has the right to disclose that fact – circulating it only to the extent required for the protection of the society, or possibly, of other organizations. **Neither the society nor any of its members has the right to make public the charge of which an officer or member has been found guilty, or to reveal any other details connected with the case. To make any of the facts public may constitute libel.**” Mr. Maddux has made this information public, as well as making the charges public. Ms. Raisdanai has willfully participated in this negligent and libel action.

3. It further states **“If thus accused, he has the right to due process – that is, to be informed of the charge and given time to prepare his defense, to appear and defend himself, and to be fairly treated.”** Mr. Maddux and Ms. Raisdanai has violated my right to due process by not allowing me to be interviewed, not allowing key witnesses to be interviewed, not allowing me to prepare a defense and not allowing me to appear and defend myself nor treating me fairly.
4. It further states **“CONFIDENTIAL INVESTIGATION BY COMMITTEE – A committee whose members are selected for known integrity and good judgment conducts a confidential investigation (including a reasonable attempt to interview the accused)** to determine whether to recommend that further action, including the preferring of charges if necessary, is warranted.” Mr. Maddux and Ms. Raisdanai have not conducted a confidential investigation nor have they made a reasonable attempt to interview the accused.
5. It further states **“An investigation committee appointed as described above has no power to require the accused, or any other person, to appear before it, but it should quietly conduct a complete investigation, making an effort to learn all relevant facts. Information obtained in strict confidence may help the committee to form an opinion, but it may not be reported to the society or used in a trial – except as may be possible without bringing out the confidential particulars. Before any action is taken, fairness demands that the committee or some of its members make a reasonable attempt to meet with the accused for frank discussion and to hear his side of the story.”** Mr. Maddux and Ms. Raisdanai have ignored the demand for fairness as prescribed and have not made a reasonable attempt to meet with me to allow for frank discussion and for me to discuss my side of the story.

**In conclusion,** Mr. Maddux and Ms. Raisdanai have regularly and repeatedly violated the bylaws, the code of conduct and Roberts Rules of Order. They have governed in a dictator type fashion where they have not allowed due process or fairness and have violated the very values and pillars of our party. I will file this code of conduct complaint to the executive board and ask that they take swift and firm action against these members including consideration of removing them as officers of the organization for their egregious behavior. Further, I am in consultation with counsel on the libel and defamation that have been done by the named parties and how it has impacted the organization and me personally.

I strongly encourage the officers of our organization to not join Mr. Maddux and Ms. Raisdanai in their inappropriate behavior as it violates our rules, bylaws, code of conduct and possibly the law.

**Sincerely,**

Bailey Stober, Chair