

Confidential

November 18, 2022

To: RPT Officials Committee (Not for Distribution)

From: Matthew Patrick, SD-16

Re: Montgomery County Mediation

The purpose of this memorandum is to provide a summary to the Officials Committee of the events of September 30, 2022 when Chairman Rinaldi and I conducted a mediation for the Montgomery County Republican Party pursuant to Section 8m of the Rules of the Republican Party of Texas. It is not an assessment or a judgement of the validity or the invalidity of the positions, complaints, or facts set out by either side; rather it is my assessment of the events of that day and the conduct of the individuals involved.

As you all know, the parties did not resolve their differences and no agreement was reached. That is unfortunate, and leaves the split in the MOCO CEC essentially unchanged.

The two sides were represented by the following individuals:

Chairman Bryan Christ; James Bryers; Linda Stucky and Raquel Lewis. This side had a bit of a surprise to all involved by having legal counsel attending via zoom—Eric Opiela. Of note, Mr. Christ attempted to avoid the meeting and disclaim involvement in the dispute, attending only at the insistence of the Chair. He also began the meeting in the same vein by claiming that he ‘only followed the direction of the CEC and the rules.’ In this memo I will refer to this group as ‘the Christ group’.

The other group was represented by Jon Bouche; Allison Winter; John Wertz and Robert Walker. In this memo I will refer to this group as ‘the precinct chair group’.

Given the history of acrimony and tendency to devolve into ‘he said/she said’ recounts of past details the mediation was conducted by placing each group in separate rooms, with the Chair and I going back and forth, sometimes together and sometimes not. We made a point of pushing each group out of their comfort zone in an effort to move both sides toward an agreement. The meeting was scheduled to last 4 hours, but lasted about 5 ½.

The notable events were:

- Both sides agreed that Chairman Christ was the duly elected Chair of the County Party. Both sides agreed that the list of chairs elected in the primary was correct and represented all duly elected precinct chairs at that point in time (with 1 dispute from the precinct chair group).
- Both sides acknowledge that the precinct chair group has the majority of the members of the above referenced precinct chair list. This point is particularly important, since it impacts so much of what has been happening since -- the calling of competing meetings, whether those meetings have quorum, and whether any decisions at those meetings are valid (including subsequent appointments of new precinct chairs).
- While each side rehashed its grievances, the precinct chair group was more inclined to make concessions and more desirous of bringing the County party back together. The Christ group was more combative and unyielding, and only paid lip-service on 1 occasion to a desire to heal the rift. Ms. Stuckey & Lewis rarely provided comments, although they did participate in sidebar conversations.
- Mr. Byers seems to be a significant source of the problems. At one point, when confronted by the Chair on his misreading of the bylaws, he proclaimed that they were poorly written. Within 2 minutes of that, he was thundering at me that he *authored* the bylaws himself. When I reminded him that he had only moments before condemned the bylaws as poorly written and that if he authored them then he was the source of the problems

stemming therefrom—is that true & what he wanted to maintain?-- he responded with a simple “Yes, it is true”.

- Mr. Byers also concocted an excuse worthy of a Democrat when he attempted to explain that the Christ group’s violation of the bylaws by calling zoom CEC meetings was because some elderly precinct chairs were ‘afraid’ to attend in-person meetings. The Christ group did not respond to the idea of having sergeant-at-arms or additional security at the meetings.
- The precinct groups’ primary goal was to have a single meeting with all precinct chairs present. They repeatedly expressed willingness to just follow the bylaws, or make concessions if necessary to have a 3rd party led ‘organizational’ meeting to bring the sides together.
- After hours of prodding, we seemed to have achieved some agreement from the Christ group on minor concessions, although Mr. Christ was unyielding on the 1 thing I believed was most necessary to bring the 2 sides together (the chairing of a redone ‘organizational’ meeting by a neutral 3rd party.) Chairman Rinaldi asked the Christ group to write out a ‘best offer’ list of terms. Shockingly when this was produced not only were NONE of the things we had agreed to verbally included, but they returned to their original proposal and **added new conditions that had never been brought up.**
- I strongly admonished Mr. Christ & Mr. Byers about the dueling meetings, noting that their continued calling of such meetings would provide the basis for additional possible actions by the SREC.

Ultimately, the rift is, in my assessment, a result of a complete failure of leadership by Chair Christ. CEC’s across the state frequently have factions and/or disputes, and it is the Chair’s **job** to find a path through those disputes that works for both sides. Mr. Christ has not only failed in this principal duty, but seemed entirely uninterested in solving the problem. On questioning, he offered no solutions nor explanations of how things have gotten this far under his tenure. It will be unfortunate for the precinct chairs and for the Republican voters of Montgomery County if he continues in this vein, but ultimately it will be up to the voters of the county to replace him in the next cycle, barring further action before then.

Respectfully submitted,

Matthew Patrick, SD-16