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Libertarian National Committee Investigatory Committee Final Report

Regarding the Investigation of Allegations of Misconduct by Libertarian National Committee Secretary, Ms. Caryn Ann Harlos

Report Date: October 6, 2024
Chair: Mr. Adrian F Malagon, LNC Region Four Alternate
Secretary: Mr. Jonathan McGee, LNC Region Two Representative
Members: Mr. Pat Ford, LNC Region Six Representative
Mr. Dustin Nanna, LNC Region Three Representative (Added 08.28.24)
Mr. Steven Nekhaila, LNC At-Large Representative (Added 08.28.24)

Committee Overview & Purpose

On August 25, 2024, in Miami, Florida, the Libertarian National Committee (LNC) established the Investigatory Committee (IC). At the in-person LNC meeting, Region One Representative, Mr. Adam Haman, made the following motion:

“I move that this Board adopt the following resolution: Resolved, that a committee comprised of Jonathan McGee, Pat Ford, and Adrian F Malagon be appointed by the Libertarian National Committee to investigate allegations of misconduct by our Secretary, Caryn Ann Harlos, which, if true, cast doubt on her fitness to continue in office, and that the Committee be instructed, if it concludes that the allegations are well-founded, to report resolutions covering its recommendations.”

Per Article 7: National Committee, Section 15 of the [Libertarian Party Bylaws, Convention Special Rules, and Judicial Committee Rules of Appellate Procedure](#) (LP Bylaws), the motion was made in open session during *New Business Without Previous Notice*. No member of the LNC made a motion to enter into executive session. The discussion and subsequent attempts at amendments and substitutions to the main motion took place in open session.

[Notable Discussion Points, Amendments, and Substitutions](#) (6:19:04-7:18:37):

- Mr. Haman made the motion.
- Ms. Harlos raised a point of order and claimed to cite a portion of the [Libertarian National Committee Policy Manual](#) (LNC Policy Manual), which according to her stated that “a fair

and impartial investigatory committee would not necessarily be members of the Board.”
(No such citation exists.)

- Ms. Harlos moved to amend Mr. Haman’s motion to add Mr. Nanna, Mr. Nekhaila, and Mr. Bill Redpath to the Committee. They accepted.
- Ms. Harlos discussed the qualifications of committee members per *Robert’s Rules of Order, Newly Revised, 12th Edition* (RONR).
- Ms. Harlos did not believe an odd number of Committee members was necessary; the majority of the LNC disagreed.
- Ms. Harlos read excerpts of the LNC Policy Manual regarding discipline and removal.
- Mr. Paul Bracco moved to amend Ms. Harlos’ amendment to add Mr. Travis Bost to the Committee. With a roll call vote of 7-8-2-0 (Aye-Nay-Expressed Abstention-Not Voting), the amendment failed.
- Ms. Harlos requested Mr. Malagon’s removal from the original list of names.
- Mr. Nanna moved to amend Ms. Harlos’ original amendment to strike Mr. Malagon from the original list of names and Mr. Nekhaila from the same amendment. With a roll call vote of 7-8-2-0 (Aye-Nay-Expressed Abstention-Not Voting), the amendment failed.
- Ms. Harlos moved to amend her original amendment by substitution to appoint a committee of five comprising Mr. Bost, Mr. Ford, Mr. McGee, Mr. Nanna, and Mr. Redpath. With a roll call vote of 6-8-3-0 (Aye-Nay-Expressed Abstention-Not Voting), the substitute motion failed.
- Ms. Harlos’ original amendment failed with a roll call vote of 6-8-3-0 (Aye-Nay-Expressed Abstention-Not Voting).
- Mr. Haman’s original main motion passed with a roll call vote of 8-6-3-0 (Aye-Nay-Expressed Abstention-Not Voting).
- Ms. Harlos stated what she believed the scope of the Committee’s work should be. Mr. Malagon objected, and the LNC Chair considered the objection to be well-taken.
- Ms. Harlos moved to set a time limit of one week for the delivery of the Committee report.
- Mr. Nanna proposed an amendment to establish a time limit of three weeks.
- Both Ms. Harlos and Mr. Nanna agreed to withdraw their motions and to allow the Committee to proceed with its work without objection.

Committee Chair, Secretary, & Additional Member Appointments

Shortly after adjourning the in-person meeting at the call of the LNC Chair, Mr. Malagon met informally with Mr. McGee, Mr. Ford, and Mr. Haman to ask if they would object to the addition of Mr. Nanna and Mr. Nekhaila to the IC. After receiving no objections, Mr. Malagon contacted Mr. Nanna and Mr. Nekhaila on Tuesday, August 27, 2024, to inquire about their acceptance of nominations and appointments to the Committee during the ongoing LNC meeting. In anticipation of the motion passing the LNC without objection, Mr. Malagon asked them to join the first official Committee meeting later that evening.

Mr. McGee nominated Mr. Malagon as Committee Chair, and Mr. Ford seconded the nomination. There were no other nominations. Following his acceptance of the nomination, Mr. Malagon was unanimously appointed. Mr. Ford nominated Mr. McGee as Committee Secretary,

and Mr. Malagon seconded the nomination. There were no other nominations. Following his acceptance of the nomination, Mr. McGee was unanimously appointed.

At the continuation of the in-person LNC meeting, which took place virtually on Wednesday, August 28, 2024, at 8:30 p.m. EDT, during *New Business Without Previous Notice*, Region Four Representative Ms. Meredith Hays ceded to Mr. Malagon, and he proceeded to make the motion to appoint Mr. Nanna and Mr. Nekhaila to the Committee, which passed without objection.

Potential Conflicts of Interest

The Committee Chair asked all members to disclose any potential conflicts of interest in response to Ms. Harlos' comments about the IC's formation, with the aim of dispelling any perceived bias, whether public or private. The following disclosures were made:

Mr. Adrian F Malagon

- Mr. Malagon serves as Chair of the Libertarian Party of California (LPCA), where Ms. Harlos served as parliamentarian from on or about March 1, 2024, until her unrequested resignation on July 31, 2024.
- Mr. Malagon sought a parliamentary opinion from Ms. Harlos, solidifying the LPCA Executive Committee's rightful decision to appoint 24 out-of-state California delegates for the 2024 Libertarian Party National Convention.
- Mr. Malagon was a 2024 Libertarian Party National Convention delegate who voted for Ms. Harlos' reelection as LNC Secretary.
- Mr. Malagon was a member and State Organizer for the National Mises Caucus until his removal on July 15, 2024. The removal process included stripping him of his state organizer status and privileges, as well as removing him from all sensitive internal communications.

Mr. Jonathan McGee

- Mr. McGee donated \$1,000.00 to Ms. Harlos' reelection campaign for LNC Secretary.
- Mr. McGee was a 2024 Libertarian Party National Convention delegate who voted for Ms. Harlos' reelection as LNC Secretary.

Mr. Pat Ford, Mr. Dustin Nanna, and Mr. Steven Nekhaila

- None disclosed.

Committee Scope

The scope of the IC's investigation revolved around "allegations of misconduct by our Secretary, Caryn Ann Harlos, which, if true, cast doubt on her fitness to continue in office." Furthermore, the LNC Policy Manual, Article I. Special Rules of Order and Standing Rules, Section 1.01 General Delegation of Authority, Subsection 4) Removal From Office states, "No Party Officer or At-Large Member shall be subject to removal from office except for failure to perform the duties of office or gross malfeasance."

The words “misconduct” in the initial resolution and “malfeasance” found in the LNC Policy Manual are undefined in any internal Party document. The IC will therefore interpret these words in a manner that gives effect to their common and ordinary meanings. Additionally, while the term “malfeasance” is one with multiple meanings, in all instances it refers to an act of “wrongdoing,” whether legally, morally, or in causing some type of harm to a person or organization.

Executive Overview

The purpose of this Executive Overview is to provide an accurate account of some of the most technical aspects of the IC’s work and methodology.

Meetings

The Committee met as necessary via Zoom at the call of the Committee Chair (as agreed upon by the Committee). The meeting schedule and attendance were as follows:

First Meeting

Tuesday, August 27, 2024, 9:30 p.m. EDT—Duration: 1:03:49

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford
Mr. Dustin Nanna
Mr. Steven Nekhaila

Second Meeting

Wednesday, September 18, 2024, 7:30 p.m. EDT—Duration: 47:09

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford
Mr. Dustin Nanna
Mr. Steven Nekhaila

Third Meeting

Sunday, September 22, 2024, 2:00 p.m. EDT—Duration: 13:45

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Dustin Nanna

Members Absent:

Mr. Pat Ford
Mr. Steven Nekhaila

Fourth Meeting

Monday, September 23, 2024, 8:00 p.m. EDT—Duration: 1:16:15

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford

Mr. Dustin Nanna
Mr. Steven Nekhaila

Fifth Meeting

Sunday, September 29, 2024, 2:30 p.m. EDT—Duration: 1:35:27

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Dustin Nanna
Mr. Steven Nekhaila

Members Absent:

Mr. Pat Ford

Sixth Meeting

Wednesday, October 2, 2024, 9:00 p.m. EDT—Duration: 55:32

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford
Mr. Steven Nekhaila

Members Absent:

Mr. Dustin Nanna

Seventh Meeting

Friday, October 4, 2024, 9:00 p.m. EDT—Duration: 1:59:30

Members Present:

Mr. Adrian F Malagon
Mr. Pat Ford
Mr. Dustin Nanna
Mr. Steven Nekhaila

Members Absent:

Mr. Jonathan McGee

Eighth Meeting

Sunday, October 6, 2024, 12:00 p.m. EDT—Duration: 8:00

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford
Mr. Dustin Nanna
Mr. Steven Nekhaila

Interviews Conducted

The Committee held interviews as necessary via Zoom based on availability (as agreed upon by the Committee). The interview schedule and attendance were as follows:

Mr. Adam Haman, LNC Region One Representative

Tuesday, September 3, 2024, 8:30 p.m. EDT—Duration: 45:33

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford
Mr. Steven Nekhaila

Members Absent:

Mr. Dustin Nanna

Ms. Hannah Goodman, Libertarian Party of Colorado (LPCO) Chair
Tuesday, September 3, 2024, 10:00 p.m. EDT—Duration: 1:20:02

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford
Mr. Steven Nekhaila

Members Absent:

Mr. Dustin Nanna

Ms. Angela McArdle, LNC Chair & Emp. Policy & Comp. Committee (EPCC) Member (Part 1)
Wednesday, September 4, 2024, 8:30 p.m. EDT—Duration: 48:30

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford
Mr. Dustin Nanna
Mr. Steven Nekhaila

Ms. Kathy Yeniscavich, LNC At-Large Representative & EPCC Chair
Wednesday, September 4, 2024, 10:00 p.m. EDT—Duration: 52:11

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford
Mr. Dustin Nanna
Mr. Steven Nekhaila

Mr. Jonathan M. Jacobs, RP, CPP, Parliamentary Consultant
Friday, September 6, 2024, 8:30 p.m. EDT—Duration: 1:41:26

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford
Mr. Dustin Nanna
Mr. Steven Nekhaila

Mr. Andrew Watkins, LNC At-Large Representative & EPCC Member
Friday, September 6, 2024, 10:00 p.m. EDT—Duration: 53:07

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford
Mr. Dustin Nanna
Mr. Steven Nekhaila

Ms. Jessica Fenske, LPCO Member
Saturday, September 7, 2024, 12:00 p.m. EDT—Duration: 37:10

Members Present:

Members Absent:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford
Mr. Steven Nekhaila

Mr. Dustin Nanna

Mr. James Wiley, LPCO Executive Director

Saturday, September 7, 2024, 1:00 p.m. EDT—Duration: 54:09

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford
Mr. Dustin Nanna
Mr. Steven Nekhaila

Ms. Erin Adams, Former LNC Region Seven Representative

Wednesday, September 11, 2024, 7:30 p.m. EDT—Duration: 1:20:40

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford
Mr. Dustin Nanna
Mr. Steven Nekhaila

Ms. Hannah Kennedy, LNC Executive Director

Wednesday, September 11, 2024, 9:00 p.m. EDT—Duration: 27:24

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford
Mr. Dustin Nanna
Mr. Steven Nekhaila

Mr. Ken Moellman, Former LNC Vice Chair

Wednesday, September 11, 2024, 10:30 p.m. EDT—Duration: 1:00:59

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford
Mr. Dustin Nanna
Mr. Steven Nekhaila

Ms. Angela McArdle, LNC Chair & EPCC Member (Part 2)

Tuesday, September 17, 2024, 8:00 p.m. EDT—Duration: 1:12:56

Members Present:

Mr. Adrian F Malagon
Mr. Jonathan McGee
Mr. Pat Ford

Members Absent:

Mr. Steven Nekhaila

Mr. Dustin Nanna

Ms. Meredith Hays, LNC Region Four Representative

Tuesday, September 17, 2024, 9:30 p.m. EDT—Duration: 1:01:57

Members Present:

Mr. Adrian F Malagon

Mr. Jonathan McGee

Mr. Pat Ford

Members Absent:

Mr. Dustin Nanna

Mr. Steven Nekhaila

Ms. Caryn Ann Harlos, LNC Secretary & Subject of Investigation

Wednesday, September 18, 2024, 9:00 p.m. EDT—Duration: 2:57:53

Members Present:

Mr. Adrian F Malagon

Mr. Jonathan McGee

Mr. Pat Ford

Mr. Dustin Nanna

Mr. Steven Nekhaila

Interviews Attempted

Mr. Eliseo Gonzalez, LPCO Vice Chair

- The Committee made numerous attempts to interview Mr. Gonzalez, but he never responded.

Mr. Andrew Buchkovich, LNC Chief Technology Officer & LPCO Member

- The Committee scheduled Mr. Buchkovich for Wednesday, September 18, 2024, at 7:30 p.m. EDT. He was unable to attend due to unexpected technical difficulties.

Submitted & Found Evidence

The Committee submitted or uncovered more than 1,200 pieces of evidence pertaining to this investigation, including certificates of nomination, elector certifications, official court filings, appeals, and transcripts; miscellaneous legal documents; miscellaneous Party documents; memoranda; various parliamentary opinions, journals, and articles; screenshots of personal communications; public and private emails; public website links; public social media posts; and public videos for review.

Interview Format

Committee members were encouraged to submit potential interviewees or object to any of the ones submitted by another member. The Committee unanimously selected all of the interviewees, taking into account their significant relevance to various aspects of the Committee's investigation and work. The Committee scheduled the interviews so that, barring an unforeseen circumstance, every Committee member could attend.

The interview format was as follows:

- The Committee Chair provided an explanation for the interviewee's selection.
- The Committee Chair provided an overview of the mission and responsibilities of the IC.

- The interviewee provided free-flowing testimony and thoughts on the motion.
- Committee members asked questions.

The Committee Chair informed all interviewees that they could choose to answer or not answer any question, and every member had the opportunity to ask any question they wished. Mr. Malagon asked every interviewee the same two questions at the beginning and end of each interview:

- 1) “Do you consent to having the following interview recorded for later reference by any IC member not currently in attendance and to assist in the writing of the report with the understanding that this Committee is confidential, the recording will not be shared outside of this Committee, and that it will be deleted upon the completion of the final report before it is released to the entire LNC?”
- 2) “Based on your knowledge, experience, and testimony here today, what would you like to see this Committee ultimately recommend in its final report to the LNC?”

All interviewees gave their consent to record their testimony. Likewise, all but two (not including Ms. Harlos) expressed a desire to see the Committee recommend Ms. Harlos’ removal for her perceived malfeasance. The two exceptions expressed a desire for the Committee to recommend whatever action or inaction it deemed appropriate based on its findings.

General Findings

The broad scope of the motion required the Committee to assess any potential “misconduct” or “malfeasance” by Ms. Harlos. The interviews and evidence uncovered several recurring issues that the Committee believed warranted special attention throughout the investigation.

On the Issue of the Certificate of Nomination

In the weeks following the adjournment of the 2024 Libertarian Party National Convention, an estimated thirteen state affiliates publicly or privately expressed grave dissatisfaction with the elected Libertarian Party (LP) POTUS and VPOTUS candidates. The indignation amongst the aggrieved state affiliates was so severe that many of them were reportedly threatening to not place the official ticket on the ballot in their respective states. In an effort to resolve any specific grievances and deescalate the threats, on June 10, 2024, at 9:25 p.m. EDT, the LNC Chair announced the formation of an ad hoc Reconciliation Committee (RC) on the LNC Business List, to which, in addition to herself, she appointed Mr. Ford, Ms. Harlos, Mr. Watkins, and Ms. Yeniscavich. The LNC Chair’s announcement coincidentally came during an LPCO meeting already in progress where a resolution passed that partially stated, “BE IT RESOLVED that the LPCO will not submit paperwork to place the Oliver/ter Maat ticket on the Colorado Presidential ballot.”

The next day, the following private email exchange took place between Ms. Harlos and the LNC Chair in full view of the rest of the RC:

From: LP Secretary <secretary@lp.org>
Date: Tuesday, June 11, 2024 at 9:34 AM
To: Pat Ford <pat.ford@lp.org>, Kathy Yeniscavich <kathy.yeniscavich@lp.org>, Chair <chair@lp.org>, Andrew Watkins <andrew.watkins@lp.org>
Cc: statechair@lpcolorado.org <statechair@lpcolorado.org>
Subject: Colorado and Oliver Campaign

Hi everyone on Reconciliation Team. I have reached out to Hannah Goodman, LPCO State Chair, **who is copied above**. I asked her if the LPCO Board would be open to a meeting with the Oliver campaign team to discuss the situation in Colorado. She asked of me two things which I think are reasonable:

1. Let give it a few days to see if cooler heads prevail, so she and I will touch base on this. She made no promises on whether Board would agree but is willing to broach it if we let a little bit of time pass.
2. I told her that it was my duty to sign the Colorado SoS form and she asked me to hold off sending it off. It was my intention on signing, getting notarized, and then sending to Hannah Kennedy as there is other paperwork needed and she (Hannah) can coordinate with campaign so that would take some time.

In Liberty, Caryn Ann Harlos
LNC Secretary and LP Historical Preservation Committee Chair ~ 561.523.2250

From: LP Secretary <secretary@lp.org>
Sent: Tuesday, June 11, 2024 10:59 AM
To: Pat Ford <pat.ford@lp.org>; Kathy Yeniscavich <kathy.yeniscavich@lp.org>; Chair <chair@lp.org>; Andrew Watkins <andrew.watkins@lp.org>
Cc: statechair@lpcolorado.org <statechair@lpcolorado.org>
Subject: Re: Colorado and Oliver Campaign

Pardon me too many Hannah's in this discussion. In my point 2, she (Hannah) referred to Hannah Kennedy who is handling sending off paperwork. I do not believe that our paperwork should be sent off higgly piggly by different people.

In Liberty, Caryn Ann Harlos
LNC Secretary and LP Historical Preservation Committee Chair ~ 561.523.2250

From: Angela McArdle <angela.mcardle@lp.org>
Sent: Tuesday, June 11, 2024 10:21:40 AM
To: LP Secretary <secretary@lp.org>; Pat Ford <pat.ford@lp.org>; Kathy Yeniscavich <kathy.yeniscavich@lp.org>; Chair <chair@lp.org>; Andrew Watkins <andrew.watkins@lp.org>
Cc: statechair@lpcolorado.org <statechair@lpcolorado.org>
Subject: Re: Colorado and Oliver Campaign

What is the deadline for the paperwork? If it's not right around the corner there's no reason to rush sending it and creating a conflict.

Angela McArdle
Chair, Libertarian National Committee

From: LP Secretary <secretary@lp.org>
Sent: Tuesday, June 11, 2024 10:22:31 AM
To: Angela McArdle <angela.mcardle@lp.org>; Pat Ford <pat.ford@lp.org>; Kathy Yeniscavich <kathy.yeniscavich@lp.org>; Chair <chair@lp.org>; Andrew Watkins <andrew.watkins@lp.org>
Cc: statechair@lpcolorado.org <statechair@lpcolorado.org>
Subject: Re: Colorado and Oliver Campaign

No huge hurry - its Sept.

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From: LP Secretary <secretary@lp.org>
Sent: Tuesday, June 11, 2024 9:27 AM
To: Angela McArdle <angela.mcardle@lp.org>; Pat Ford <pat.ford@lp.org>; Kathy Yeniscavich <kathy.yeniscavich@lp.org>; Chair <chair@lp.org>; Andrew Watkins <andrew.watkins@lp.org>
Subject: Re: Colorado and Oliver Campaign

I took the LPCO state off this chain. I'm going to sign and get it to Hannah Kennedy to avoid last minute flurry because they also need the Colorado electors acceptance of nomination forms and the LPCO completely controls that. So the fact is that LPCO is likely ultimately in control here but with my life I can't be scrambling at last minute.

My signature isn't entirety of what is needed in short - the rest requires LPCO cooperation and is out of our hands.

Our standard form from what I understand is already being sent.

FYI LPCO cannot disaffiliate from us except at a regular convention and ridiculously high thresholds. That's not a danger.

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The above correspondence demonstrates a few things of note. First, Ms. Harlos understood that Ms. Kennedy, as LNC Executive Director, was responsible for “handling sending off paperwork.” (The LNC Chair testified that this was established during the initial preparation of nomination paperwork in Washington, D.C.) Second, Ms. Harlos acknowledged the potential issues that could arise if different individuals sent off the paperwork. Third, given the window of time available, the LNC Chair was committed to working on the situation with LPCO without unnecessarily jeopardizing negotiations. Fourth, the LNC Chair explicitly stated her directive to not yet send off the paperwork and provided clear explanations for her decision. Fifth, Ms. Harlos recognized that time was not a critical factor. Sixth, Ms. Harlos understood that it was ultimately in LPCO’s control to submit the appropriate paperwork.

The situation in Colorado escalated when LPCO member Mr. Sean Vadney submitted an appeal on June 16, 2024, to the LPCO Judicial Committee (LPCO JC) seeking relief in the form of the repeal of the resolution passed at the LPCO meeting. (Ms. Harlos posted on X (formally known as Twitter) on June 13, 2024, three days before the appeal was submitted, that she'd been notified of the LPCO JC appeal and was recusing herself as LPCO JC Chair as a "personal reflection on Conflict of Interest.") The LPCO JC informed Mr. Vadney and the LPCO Board on June 22, 2024, that they had "decided, by a unanimous vote, to not hear the appeal."

Rumors suggesting irregularities surrounding the nomination of the official ticket only reinforced the delicate nature of the situation. A major donor even sent an email to the LNC Chair, suggesting that if the perceived issue remained unresolved, they would either request a refund or refrain from making future donations.

From: [REDACTED]
Sent: Monday, June 17, 2024 10:45 AM
To: Angela McArdle <angela.mcardle@lp.org>
Subject: Presidential and Vice Presidential Nomination process

Angela,

I recently contributed \$15,000 to the Libertarian Party. I understand there may have been some irregularities in the nomination process at the most recent convention for the presidential and vice presidential candidates. As Chair of the Party, can you verify that the nomination process followed best practices and Party ByLaws? If the nomination was not held in such a manner, can you please reopen the process?

--
Thanks,
[REDACTED]
[REDACTED]

Mr. Matt Loesby from the Libertarian Party of Idaho authored "An Open Letter to the Libertarian National Committee," which Mr. Haman forwarded to the LNC Business List on the evening of June 17, 2024 (at his insistence) requesting that the LNC remove the POTUS nominee, replace him with the VPOTUS nominee, and appoint a different nominee to fill the would-be vacancy. In a lengthy reply to the open letter, Ms. Harlos wrote (in bold, underlined, and highlighted in yellow) "I ask that we let our Chair lead—give her some breathing room."

On July 2, 2024, LPCO announced on X that they intended to "place the Kennedy/Shanahan ticket on the Colorado state ballot for president and vice president." Shortly after, in private communications to several LNC members, Ms. Harlos claimed that she considered this a "betrayal of personal trust" and "blindsiding." The following day, Ms. Harlos resigned from the RC, citing her "very adversarial relationship with Colorado" as the reason.

Following Ms. Harlos' RC resignation, she sent several messages to various LNC members, asserting that the LNC Chair not only knew about LPCO's plans to attempt to put Mr. Robert F. Kennedy Jr. on the ballot from the beginning but was actually facilitating the effort and withholding information. Ms. Harlos admitted during her testimony to the Committee that, "I do not have proof of it, but I believe it." However, various accounts provided to the IC indicate that the LNC Chair had only learned about this alleged plan (then a rumor) from Ms. Harlos herself at the tail end of June 2024. Furthermore, once the LNC Chair became aware of LPCO's intentions, she facilitated a meeting with the Oliver/ter Maat campaign to seek a satisfactory resolution. After a few days, the LNC Chair became aware of Ms. Harlos' messages to LNC members, prompting her to send a private message to inquire, "Are you okay?" Ms. Harlos started telling several LNC members, who had also reached out to her, that the LNC Chair was "using my history of depression against me to undermine me."

On July 4, 2024, Ms. Harlos phoned Ms. Yeniscavich, accusing an LNC staff member of being heavily involved with getting Mr. Kennedy on the Colorado ballot. Ms. Harlos refused to file a formal complaint against the staff member with the EPCC out of “fear that Angela [McArdle] is going to retaliate against me.” Ms. Yeniscavich assured her there would be no reason for that to occur, but she offered to attempt to handle the complaint informally.

On July 6, 2024, Ms. Harlos submitted her own appeal to the LPCO JC. Her appeal challenged the legitimacy of the LPCO’s decision regarding the presidential ticket. However, shortly after publishing a notice on July 18, 2024, for a nominating assembly on August 12, 2024, to address the resolutions previously passed regarding the LPCO’s POTUS and VPOTUS candidates, she withdrew her appeal, deeming the matter moot.

Privacy concerns by witnesses have led to the deletion or non-physical provision of many of the previously and later referenced personal communications (others were phone calls). Ms. Harlos sent the following email to the LNC Private List on July 7, 2024, at 10:04 p.m. (PDT):

CONFIDENTIAL: POLITICAL STRATEGY



LP Secretary <secretary@lp.org>
To: LNC Board



Sunday, July 7, 2024 at 10:04 PM

I can't reveal my source but PA is about to pull a CO. It is being orchestrated by Mises Caucus people. If you don't know, I resigned the Caucus over CO. Anyone here on the LNC that is still part, this is ----- profanity coming -- censure me, I don't give a fuck

FUCKING RIDICULOUS.

Get your caucus leadership to have some fucking balls and stop this shit. They are going to be responsible for the destruction of the Party.

Fuck RFK, Jr. with his own brain worm.

In Liberty, Caryn Ann Harlos
LNC Secretary and LP Historical Preservation Committee Chair ~ [561.523.2250](tel:561.523.2250)

The following late morning (PDT), July 8, 2024, Ms. Harlos phoned Ms. Yeniscavich to inform her that she succeeded in finding a Certificate of Nomination form that did not require the LNC Chair’s signature, just the LNC Secretary’s signature, and that she planned on submitting it to the Colorado Secretary of State’s office. She explained that she had spoken with them that morning, and that, as she understood it, should there be a dispute as to which nominee was going to appear on the ballot line, the first candidate to have their paperwork submitted would be the presumed nominee, which is why it was imperative she get there first. During that same conversation, Ms. Harlos told Ms. Yeniscavich, “Don’t tell anyone, but especially not Angela [McArdle],” because “it’s something I want to do.”

Ms. Yeniscavich asked Ms. Harlos to reconsider taking what she considered to be a rash, premature action, reminding her that the consequences could be legally catastrophic for the LNC and unnecessarily so since LPCO still had almost two months to submit the original notarized copy. Ms. Harlos responded that she “didn’t want to take that chance, was going to do it, and then announce it on the list once it was done,” as confirmed by the email below hours after the conversation:



LP Secretary <secretary@lp.org>

Monday, July 8, 2024 at 2:45 PM

To: LNC Business; 4eb01eb9.lp.org@amer.teams.ms; ○ businesslist-forward

Just to let the LNC know, the signed Certificate of Nomination of Chase Oliver and Mike ter Maat, signed and notarized by me (the Colorado SoS does not require the signatures of both the Secretary and the Chair, just one of those two) has been delivered to and accepted by the Colorado Secretary of State.

I spoke with the SoS office who is aware that the Libertarian Party nominates by national convention and that the national convention did not authorize the state committee to make its own nomination.

In Liberty, Caryn Ann Harlos
LNC Secretary and LP Historical Preservation Committee Chair ~ [561.523.2250](tel:561.523.2250)

Soon after the call, Ms. Yeniscavich informed the LNC Chair that the unauthorized paperwork, which Ms. Harlos had explicitly been instructed to refrain from submitting while negotiations with LPCO were ongoing, was on its way to the Colorado Secretary of State's office. The LNC Chair described the situation as a "lose-lose" during her testimony. In the short time she had, the LNC Chair decided not to try to rescind the submission without first discussing the issue with LNC Counsel, fearing potentially worse consequences.

That same day, Ms. Harlos delivered a demand letter to LPCO, requesting records to which she claimed her LPCO sustaining membership entitled her. According to a written but unsubmitted Libertarian Party Judicial Committee (LP JC) appeal, LPCO perceived this letter as part of "a broader campaign of public harassment," and about a week later, LPCO's attorney rejected the records request.

During her interview, Ms. Harlos denied that the July 8, 2024, conversation with Ms. Yeniscavich ever took place. The committee chair repeatedly questioned Ms. Harlos about that conversation because her testimony contradicted Ms. Yeniscavich's account. The following day, Ms. Harlos attempted to correct that part of her testimony (as well as several others) in a series of 12 emails sent over four hours to the IC. In one email, Ms. Harlos states, "The LNC member who encouraged me to call the SoS to see if I could just send in that form by itself even if I did have all of them was Steven Nekhaila." Mr. Nekhaila acknowledges that Ms. Harlos called him, but denies that he encouraged her to contact the Colorado Secretary of State.

The day after submitting the unauthorized paperwork to the Colorado Secretary of State, Ms. Harlos attempted to direct the LNC Executive Director to submit paperwork to the Montana Secretary of State on July 9, 2024, triggered by an email request from the Oliver/ter Maat campaign manager, Mr. Steve Dasbach. However, the LNC Chair immediately clarified the directive:

From: Caryn Ann Harlos <carynannharlos@gmail.com>
Sent: Tuesday, July 9, 2024 8:34:38 PM
To: Steve Dasbach <stephendasbach@gmail.com>
Cc: Angela McArdle <angela.mcardle@lp.org>; LP Secretary <secretary@lp.org>; Hannah Kennedy <hannah.kennedy@lp.org>
Subject: Re: Certificate of Nomination - Montana

Hi Hannah, Steve accidentally copied my personal email so copying my secretary one. Please let me know.

In Liberty,
Caryn Ann

On Tue, Jul 9, 2024 at 8:53 PM Angela McArdle <angela.mcardle@lp.org> wrote:
Taking Steve off. Caryn Ann, you are acting outside your authority. These papers are to go to chairs, not the SOS.

Angela McArdle
LNC Chair

From: Caryn Ann Harlos <carynannharlos@gmail.com>
Sent: Tuesday, July 9, 2024 9:54:20 PM
To: Angela McArdle <angela.mcardle@lp.org>
Cc: Hannah Kennedy <hannah.kennedy@lp.org>; LP Secretary <secretary@lp.org>
Subject: Re: Certificate of Nomination - Montana

We have sent them to both. That was the direction.

Fine, it's the LNC's authority.

In Liberty,
Caryn Ann

According to the LNC Chair's testimony, Ms. Harlos initially expressed concerns about the Oliver Campaign having access to or being involved in the certificate of nomination process as early as the notarization task in Washington, D.C. Multiple witnesses also testified that Ms. Harlos attempted unilateral involvement in other states before the LNC Chair intervened.

Returning to Colorado, the LNC Chair responded to Ms. Harlos' announcement email in a separate thread after consulting with LNC Counsel:

Re: NOTICE OF EXECUTIVE COMMITTEE MEETING 7/11/24 AT 9PM EASTER



Angela McArdle <angela.mcardle@lp.org>

To: LP Secretary; LNC Business; 4eb01eb9.lp.org@amer.teams.ms; businesslist-forward

Tuesday, July 9, 2024 at 11:00 PM

We are at freedomfest trying to fundraise and do work. This week is not convenient for any meeting and you know that. You didn't run any of this by me. A time sensitive fundraising need and opportunity have arisen so we will meet and do what needs to be done.

You will not usurp my authority as chair. You have taken unilateral actions this week that have put us at risk of legal action. To be clear, you acted outside the scope of your authority when you sent that form to the SOS, knowing that lpco had entered into a written agreement with Kennedy. Now you want to rope us in and have us sanction your actions and possibly take legal action or involve us if you are sued for it.

I want to make it abundantly clear you had no authority to do so and I did not know about it. We are not getting pulled into a lawsuit on your behalf.

I've also learned that you have personally threatened to sue lpco and sent a demand letter, so you have a serious conflict of interest here and should not even be voting on any legal action from this board.

Angela McArdle
LNC Chair

The following morning, on the LNC Private List, Ms. Harlos stated that what she did was "quite banal" and gave notice of a motion she intended to bring forward to the LNC Executive Committee (LNC ExCom) that would direct the LNC Chair to instruct LNC Counsel to prepare documentation regarding Colorado. The LNC Chair made it clear that she would oppose any motion that would expose the LNC to additional liability:

From: LP Secretary <secretary@lp.org>
Sent: Wednesday, July 10, 2024 12:49:09 AM
To: LNC Board <lnboard@lp.org>
Subject: CONFIDENTIAL: My agenda item that I removed from Thursday's excomm

In speaking with the Colorado Secretary of State, the LPCO has filed nothing. They stated that as far as they knew that the national convention was always where our nominees were selected. They requested a letter from our general counsel merely stating our process for presidential elections, who was elected, and that no state committee was delegated authority by the convention to nominate candidates along with a brief explanation statement of our affiliate structure and how they participate in nominations. They wanted it this week but that apparently will not happen.

It was nothing shocking. It wasn't a lawsuit. They stated they were aware it was absolutely routine for the national Libertarian Party to submit the bare nomination certificate which is all that I did. This is quite banal.

I leave this open for discussion.

I will then ask for co-sponsors for this motion (unless we workshop it here):

Move to instruct the Chair to instruct Oliver Hall to prepare the document referenced in the Confidential email thread dated July 10, 2024 with regarding to Colorado.

In Liberty, Caryn Ann Harlos
LNC Secretary and LP Historical Preservation Committee Chair ~ [561.523.2250](tel:561.523.2250)

From: Angela McArdle <angela.mcardle@lp.org>
Sent: Wednesday, July 10, 2024 11:30:09 AM
To: LP Secretary <secretary@lp.org>; LNC Board <lnboard@lp.org>
Subject: Re: CONFIDENTIAL: My agenda item that I removed from Thursday's excomm

I will oppose any motion "instructing" me to drag us into a lawsuit. We are grossly short on funds, hence the proposed fundraising agreement.

After our experiences with the SoS in New Mexico and Massachusetts, I do not feel confident that we have the authority to override state affiliates with the SoS. It has not worked out in the past. However, LPCO is very angry and is talking about suing, which is why I made it very clear that Ms. Harlos acted outside the scope of her authority, without my knowledge.

I do not believe they requested a letter. I've plenty of SoS offices and they don't ever request things or try to push things along. I'm sure you suggested it to them, though.

Angela McArdle
LNC Chair

Hours later, on the LNC Business List, Ms. Harlos requested co-sponsors for a motion directing staff to send paperwork "for each state in which we have not already done"—which, if passed, would have suggested the LNC sanctioned or approved her submission to the Colorado Secretary of State. The motion failed by a vote of 6-9-0-2 (Aye-Nay-Expressed Abstention-Not Voting).

Request for co-sponsors: Direct staff to send certificates of nomination



LP Secretary <secretary@lp.org>

To: LNC Business; 4eb01eb9.lp.org@amer.teams.ms; [businesslist-forward](#)

Wednesday, July 10, 2024 at 8:47 AM

I request co-sponsors for the following motion:

More to direct staff to send the Certificate of Nominations to each Secretary of State/Bureau of Elections for each state in which we have not already done so and those for which we already have written confirmation that the State Chair has already done so or they have already received and acknowledged in order to put the Oliver/ter Maat ticket on the ballot. This should be fully accomplished within the next seven days.

In Liberty, Caryn Ann Harlos
LNC Secretary and LP Historical Preservation Committee Chair ~ [561.523.2250](tel:561.523.2250)

Ms. Goodman, LPCO Chair, sent an email that same day with the subject line "Unauthorized Filing of Nomination Paperwork" to Mr. Caleb Thornton, the Legal, Policy, and Rulemaking Manager for the Colorado Department of State, on July 10, 2024. In that email, she requested that the unauthorized paperwork be nullified because Ms. Harlos had "acted outside the authority granted by both the national and state Libertarian parties" in filing that paperwork. As the exchange continued, she requested a copy of the elector paperwork, which she had just learned had been submitted the day before by a LPCO member, even though well over a majority of dutifully selected electors had not been contacted or signed any paperwork.

Upon finding out that Mr. Thornton was either unable or unwilling to acquiesce her request, Ms. Goodman sent the LNC a cease-and-desist letter on July 12, 2024, demanding that the LNC end all activity concerning Colorado and "withdraw any presidential nomination paperwork filed with the Colorado Secretary of State within 5 days." Again, on the advice of LNC Counsel, the LNC Chair sent the Colorado Secretary of State the following email:

From: Angela McArdle <angela.mcardle@lp.org>
Sent: Wednesday, July 17, 2024 6:06:03 PM
To: Caleb Thornton <Caleb.Thornton@coloradosos.gov>; Hannah Goodman <hannah.goodman@lpcolorado.org>; Jeffrey Mustin <Jeffrey.Mustin@coloradosos.gov>
Cc: Eli Gonz <eli.gonz@lpcolorado.org>; James Wiley <james.wiley@lpcolorado.org>
Subject: Re: Unauthorized Filing of Nomination Paperwork

Good Afternoon Mr. Mustin:

I am the Chair of the national Libertarian Party, and I am requesting that the false electors be withdrawn.

Please advise.

Angela McArdle
Chair, Libertarian National Committee

The Colorado Secretary of State's office maintained that this was an "intra-party" issue and ignored the LNC Chair's request. As a result, Ms. Harlos' unilateral and unauthorized actions effectively deprived LPCO of its right to not have a candidate appear on its ballot line. Ms. Harlos acknowledged this right in the RC Signal chat as early as June 16, 2024, when she wrote, "There is no requirement in our bylaws requiring states to put [candidates] on ballot." On June 18, 2024, she reaffirmed this right in an email to the RC, in which she attached a ghostwritten "LNC Response" to Mr. Vadney's LPCO JC appeal:

I think our response should be limited to the fact that there is NO explicit bylaw requiring states to put candidates on the ballot; however, that could be a factor the LNC *could* consider in its own considered business judgment outside the reach of the LPCO JC or any other body and ask the LPCO JC to consider its case on the merits of its own bylaws and to leave national out of it.

In Liberty, Caryn Ann Harlos
LNC Secretary and LP Historical Preservation Committee Chair ~ [561.523.2250](tel:561.523.2250)

Additionally, in the aforementioned ghostwritten "LNC Response," Ms. Harlos writes, "The LNC has no desire to interfere or be involved with the internal decisions of the LPCO JC and asks that its decisions be limited to the LPCO's own Bylaws, though the LNC would gladly receive any feedback or recommendations to take under consideration." Whether anyone outside of the RC ever sent or saw the ghostwritten response remains unclear.

On July 24, 2024, Mr. Thornton sent an email declaring, "In the absence of a submission of a withdrawal form from either candidate, our office must proceed with placing [the Oliver/ter Maat ticket] on the Colorado ballot as the Libertarian Party candidates..." Ms. Harlos posted the full email on the LNC Business List with the subject line, "Good news! Correspondence I received from the Colorado Secretary of State (as a member who made inquiry)" the same day.

On August 23, 2024—a full two weeks before Colorado's September 6, 2024 deadline—Mr. Kennedy suspended his presidential bid, and the Kennedy/Shanahan ticket never actually appeared on LPCO's ballot line. The Committee concluded that Ms. Harlos could have averted months of animosity before and after if she had followed the LNC Chair's numerous instructions and permitted negotiations to proceed without any threats or actions that could have exposed the LNC to potential legal action.

On the Issue of Colorado Electors

On July 12, 2024, Ms. Meredith Hays had an over three-hour conversation with Ms. Harlos in hopes of serving as a mediator. The conversation ultimately proved futile, as Ms. Harlos insisted that she "had done nothing wrong" and that the LNC Chair had played a role in LPCO's attempt to put Mr. Kennedy on the ballot. She also asserted that the LNC Chair had ghostwritten the cease-and-desist letter Ms. Goodman sent to the LNC. Ms. Harlos cited no evidence for this, but stated that Ms. Goodman was "not booksmart" and, therefore, could not have been the author.

With respect to the fraudulent electors submitted on July 9, 2024, Ms. Harlos admitted to Ms. Hays that she knew who had submitted the unlawful list (although she refused to mention them by name). Furthermore, while Ms. Hays could not recall with absolute certainty, she seemed to remember Ms. Harlos revealing that, while she had not submitted the list herself, she knew it was going to be submitted ahead of time. A post made on [X](#) on July 10, 2024, in which Ms. Harlos wrote (in part) "Oliver/ter Maat presidential electors for CO yesterday. Not by me." appears to corroborate Ms. Hays' recollection. The LNC Chair, concerned about the serious legal

implications of electoral fraud, directly asked Ms. Harlos on the LNC Private List what her involvement was in this matter. Ms. Harlos replied, “Correct. Not by me. I was told they were. I didn’t file them.”

The Committee acknowledges that the Colorado Secretary of State’s office received fraudulent electors, but the Committee did not find enough evidence to conclude that Ms. Harlos was *directly* involved in that submission.

On the Issue of Official Duties

The LP Bylaws, last adopted at the Libertarian Party National Convention in May 2024 in Washington, D.C., outline several official duties of the LNC Secretary. The LNC Policy Manual, last updated on August 1, 2024, outlines several “Special Rules of Order and Standing Rules” of the LNC Secretary (i.e., duties). The word “Secretary” appears 33 times in each document.

There is no mention in either document that the LNC Secretary’s official duties include sending certificates of nomination to any secretary of state’s office. In fact, Article 6: Officer, Section 5, clearly states that “The Secretary shall be the recording officer of the Party and **shall perform such duties as are assigned by the Chair or the National Committee.**” (Emphasis added.) Not only did the LNC Chair not direct the LNC Secretary to send the Certificate of Nomination to the Colorado Secretary of State’s office, the LNC Chair explicitly directed the LNC Secretary to *refrain* from doing so because LPCO was seemingly in the middle of exploring their options and looking to flex their political leverage before their submission deadline of September 6, 2024, per Ms. Goodman’s testimony.

Since July 8, 2024, Ms. Harlos has repeatedly stated over social media, various streams, recorded videos, the LNC Business List, private email threads, and personal conversations that submitting the Certificate of Nomination to the Colorado Secretary of State was her “duty as LNC Secretary,” declaring that doing so for any state affiliate is again her “duty.” But the LNC Secretary has no such duty. As Ms. Harlos acknowledged in personal messages she sent to Ms. Yeniscavich (which Ms. Harlos has since deleted) and personal conversations with Ms. Yeniscavich, Ms. Harlos played no part in this process during the 2020 election cycle. Instead, Ms. Harlos admitted; that Mr. Robert Kraus, the LNC Operations Director at the time, took on the responsibility.

Furthermore, the Committee is unaware of any other specific secretary of state to whom Ms. Harlos coordinated the submission of a certificate of nomination outside of Colorado. Several states would find this inappropriate, if not impossible. In some states, there is a separation between the office of secretary of state and the office of elections. Other states (*e.g.*, California and Nevada) only accept documentation from the state chairs or state secretaries (a fact confirmed by those respective state chairs). Here, the LNC Chair specifically directed Ms. Harlos not to submit a certificate of nomination to the Colorado Secretary of State’s office, and she had no independent authority to do so under the LP Bylaws, which require the Secretary to “perform such duties as are assigned by the Chair.” Therefore, Ms. Harlos’ submission of the certificate contravened both the LNC Chair's directive and the LP Bylaws.

Despite recent claims to the contrary, this Committee concluded, based on several conducted interviews and available evidence, that the LNC Secretary should never have been directly

involved in this process. The duty to send out the certificates of nomination to secretary of state offices has normally been that of LNC staff (specifically the LNC Operations Director, the occasional atypical ask at the direction of the LNC Chair notwithstanding). This practice has remained unchanged, according to both the LNC Chair and the LNC Executive Director's testimonies.

On the Issue of Breach of Fiduciary Duty

Mr. Oliver Hall, LNC Counsel, wrote a memorandum titled *Fiduciary Duties of LNC Board Members and Management of LNC Staff* on May 23, 2023, at the request of the LNC Chair. Mr. Nekhaila arranged for Ms. Debbie Mason, a professional and executive consultant to nonprofit boards, to lead a two-day LNC training session on August 24-25, 2024. Both professionals, having intimate knowledge of the subject matter, explained it in a similar fashion.

The fiduciary duties of a nonprofit corporation, particularly in the District of Columbia, primarily include the duty of good faith, the duty of care, and the duty of loyalty. Directors and officers of a nonprofit corporation are required to act in good faith and in a manner they reasonably believe to be in the best interests of the corporation. Directors must discharge their duties with the care that a person in a similar position would reasonably believe appropriate under similar circumstances. The corporation allows them to rely on information, opinions, reports, or statements provided by reliable and competent officers, employees, or professionals, provided they do not possess knowledge that would render such reliance unwarranted. Officers with discretionary authority must also act in decent faith, with the care an ordinarily prudent person in a similar position would exercise, and in a manner they reasonably believe to be in the best interests of the corporation. Additionally, officers have a duty to inform their superiors or the board of directors about material information, as well as any actual or probable material violations of law or breaches of duty by other officers, employees, or agents. Furthermore, directors and officers must avoid conflicts of interest and refrain from using their positions to obtain personal benefits at the expense of the corporation. They must carefully and responsibly manage the corporation's financial affairs and adhere to all regulatory requirements that impact the corporation.

Ms. Harlos has testified that she had a "fiduciary duty to put Chase Oliver on the ballot in Colorado." She overlooked, or misunderstood, that the LNC Chair was already in the process of accomplishing this while delicately balancing a contentious situation and that any duties beyond the specifically stated LP Bylaws or LNC Policy Manual could only be directives from the LNC Chair. Ms. Harlos should have followed the LNC Chair's explicit directive to do nothing in this situation, not only to avoid violating the LP Bylaws but also to ensure she wouldn't breach her fiduciary obligations to the organization.

From time to time, directors of an organization are bound to have legal action taken against them. What they must avoid doing, however, is acting improperly or outside of the scope of their duties in a manner that *invites* litigation. A director's fiduciary duties are to the organization—not to their own interests nor to the members. They must act in the best interests of the organization. A director's fiduciary duty is not furthered by robbing a subsidiary organization of their rightful ownership of their own state ballot and causing the organization massive legal liability. This is especially true when the director is aware that the current financial status of the organization cannot support further lawsuits. Shortly after taking the unauthorized action, Ms. Harlos

flippantly stated at a virtual LNC meeting that the Board would have to indemnify her if she faced a lawsuit. This, in addition to the quick fashion in which everything unfolded, clearly shows her lack of regard for her duty of care and arguably constitutes a breach of fiduciary duty as a director of the Board.

As will be discussed further in an upcoming section titled *On the Issue of Harassment*, Ms. Harlos has utilized her large, public platform to malign fellow Board members since July 2024. The problem with this is not how it makes those maligned members feel, but rather how those statements affect the organization as a whole. It can be argued that Ms. Harlos violated her fiduciary duty by publicly undermining the organization/Board for self-serving purposes, aiming to gain support from her followers, and against those Board members she perceives as being adverse to her.

The LNC Chair also revealed to the Committee that Ms. Harlos' actions and general public behavior have resulted in at least two major donors refraining from gifting the Party any additional monies, in the amount of tens of thousands of dollars each. On a positive note, the actions taken by the LNC Chair, coupled with various forms of informal arbitration and mediation with LPCO leadership, have, as of the writing of this report, spared the LNC from direct legal action.

On the Issue of Misrepresentation

The main issue here is the certificate of nomination submission. Ms. Harlos would not have been able to take such action outside of her role as LNC Secretary, which means that her action implicated the LNC in the eyes of the Colorado Secretary of State, LPCO, and any other person or organization who may not understand the difference or the structure of the LP as a whole. While Ms. Harlos may have felt aggrieved as an LPCO member over their considerations regarding who would or would not appear on the state ballot line, she "remedied" the situation as LNC Secretary, which appears to be an abuse of her office.

As previously demonstrated, LPCO felt so strongly about what they perceived to be a violation of their autonomy that the LNC Chair had to go out of her way multiple times to show all parties involved that the LNC had never sanctioned or encouraged her actions and that she was "acting outside the scope of her authority." According to Ms. Yeniscavich's testimony, on at least one occasion, Ms. Harlos admitted identifying herself as the LNC Secretary when she called the Colorado Secretary of State's office. On July 8, 2024, Ms. Harlos asked the office which nominee would appear on the ballot line in the event of a disagreement. They informed her that the protocol was to first consult the organization's bylaws. Ms. Harlos replied, "As the LNC's Secretary, I can tell you what they say."

Particularly disturbing, however, was the *Rage Against the War Machine* [GoFundMe](#) that Ms. Harlos set up and promoted on [X](#) multiple times under false pretenses:



Caryn Ann Harlos is organizing this fundraiser.

Donation protected

I was originally invited to go and work this event. But I am a traitor now for not going along with fundraising for a non-Libertarian candidate. Not originally budgeted but I really would like to go and take you along with me through my camera. I am inviting myself back. Can you help?

The LNC Chair, who was the primary LP organizer, confirmed that Ms. Harlos never received an invitation to attend and work this event. Instead, Ms. Harlos exploited her public feud with the LNC Chair and other Board members to deceive the four donors who contributed to her \$500.00 goal. She suggested two blatant falsehoods: first, that the LNC Chair or the Party would initially cover her travel expenses, and second, that they would no longer cover her expenses because they considered her a “traitor” for her opposition to the LNC’s Joint Fundraising Committee (JFC) with the Kennedy Victory Fund (KVF).

On the Issue of Alleged Harassment

On July 26, 2024, Ms. Harlos personally filed a lawsuit in the District Court of Denver requesting a TRO and Preliminary Injunction in her capacity as a member of LPCO, the latter of which was to force the LPCO Board to produce documents she believed she was entitled to. Her requested documents are in a privileged class, necessitating both good faith and a proper purpose. After an evidentiary hearing on August 21, 2024 the TRO was denied.

Ms. Harlos apparently attempted to retain process servers who failed to serve the complaint. This resulted in Ms. Harlos taking it upon herself to drive with her husband, Mr. Wayne Harlos, to Ms. Goodman’s town (roughly three and a half hours away) the following day with the intention of having him serve her personally at her private residence. Mr. Harlos had a history of aggression against Ms. Goodman, according to Ms. Goodman’s testimony. Mr. Harlos successfully served Ms. Goodman at her private residence, while Ms. Harlos waited in their vehicle. After completing the service, they decided to stay in town for breakfast. Ms. Goodman’s husband confronted them during or shortly after their breakfast. Given their history, he was less than pleased that Mr. Harlos showed up at his house unannounced to serve his wife papers when he was not present.

Ms. Harlos also took to X to chronicle these developments. From about July 3, 2024, to the writing of this report, Ms. Harlos has either tagged, replied to, or mentioned Ms. Goodman by name well over 50 times. From about August 8, 2024, to the writing of this report, Ms. Harlos has either tagged, replied to, or mentioned LPCO by name well over 90 times. From about July 18, 2024, to the writing of this report, Ms. Harlos has either tagged, replied to, or mentioned the LNC Chair by name or as “Dear Leader” well over 45 times.

On the Issue of Decorum

Shortly after the meeting that formed the IC, Ms. Harlos engaged in a campaign of publicly airing her grievances, which targeted the LNC as a whole, LNC staff, and later specific LNC members—the LNC Chair, for example, and later Mr. Haman—as shown below:

- August 16, 2024 (5:13 p.m.): (An EPCC complaint, involving LNC staff, led to the deletion of this post and three others like it.)



- [July 21, 2024](#) (7:18 p.m.): “My prediction. Ross will be freed (thank God) - that was going to happen anyway. It has shit all to do with Angela. Nothing else. And the LP will be stuck with the stank of shit.”
- [July 28, 2024](#) (4:44 p.m.): “Remember when the chair tries to railroad me for exercising my LPCO rights, she was using her position as Chair to sabotage our candidates. Info from reputable reporter here.”
- [July 28, 2024](#) (5:17 p.m.): “Oh I was told a reporter that LPCO told them that McArdle was actively working with LPCO to get Chase removed from the CO ballot to be replaced with RFK, Jr. That reporter was in live time conversation with a LPCO rep at the time at that text.”
- [August 27, 2024](#) (6:47 p.m.): “I’m going to do a show on the LPCO parliamentary opinion. The person who somehow convinced Haman to libel me has either never read the National bylaws or LPCO bylaws or like a certain segment are just degenerate lawless people. I live by the rules I voluntarily agreed to.”
- [August 27, 2024](#) (6:53 p.m.): “Oh I just want everyone to know the type of persons (not all), not one of the plotters even gave me the slightest heads up that they were going to do what they did even when I was in such back pain I was crying. Rotten souls. I never treat people like that. Ever:”
- [September 7, 2024](#) (7:27 p.m.): “The IC is supposed to be independent of outsiders. The Chair wouldn’t be trying to influence it, or whip opinion, I’m sure.”
- [September 8, 2024](#) (4:12 p.m.): “Disagreeing on a board is now insubordination to Dear Leader. Okay yell at me that I was just naive but what the hell happened?”
- [September 8, 2024](#) (5:40 p.m.): “Lolol the an LNC member is a regular ass (in charge of IC) and the Chair pretends to admonish him but it's really everyone else’s fault. You really can't make this up.”
- [September 8, 2024](#) (5:41 p.m.): “She managed to claim it was everyone else's fault for [Malagon] being a complete ass!”
- [September 8, 2024](#) (5:51 p.m.) “It's your fault [Malagon] hit you!!!! My God, the gaslighting.”
- [September 9, 2024](#) (9:46 a.m.): “The Libertarian Party should not be used as a vehicle to promote personal political side projects of the Chair. Huge potential conflict of interest with potential (no guarantee nor none claimed) pecuniary payback. Do one or the other.”

- [September 9, 2024](#) (10:49 p.m.): “Working on minutes from August ambush meeting when I was doubled over from spinal stenosis. Region 1 should be very proud. Likely out tomorrow. Shame on you Adam. But I’ve been a believer in Karma though she's a slow ass bitch she always comes through. You needed me badly a few weeks before. I could have thrown you under the bus. I’m better than that. My faith in goodness and God keeps me strong in all things.”
- [September 13, 2024](#) (5:52 p.m.): “You ever watch the news talking heads repeating the same line over and over? Yeah that's what the LNV hive mind is doing in secret now to dogpile me and Keith (they removed Brittany from chain). I'm breaking no rules, nothing is ex session.”
- [September 14, 2024](#) (11:52 a.m.): “@brittanyforpa you should have seen how abusive they were to Keith and I after removing from chain. Not ex Sess.”
- [September 14, 2024](#) (11:53 p.m.): “Oh and your rep was part of it. It's just TOO much work to deal with emails about member concerns.”
- [September 14, 2024](#) (12:21 p.m.): “Adam Haman is openly advocating breaking his fiduciary duties.”
- [September 14, 2024](#) (12:28 p.m.): “If Adam Haman can't keep his fiduciary duty he should resign.”
- [September 14, 2024](#) (12:54 p.m.): “It appears at "board training" all that was learned was "minority shut up" but NOTHING about fiduciary duty.”
- [September 14, 2024](#) (6:36 p.m.): “Good news! My schedule changed so Wednesday is perfect. [Malagon] try to be jerks and God means it for good.”
- [September 15, 2024](#) (10:48 a.m.): “No one should sign that new CRM NDA. It was never ran through LNC and it is horrible though likely unenforceable. This broad documents have been ruled as repugnant to public policy.
- [October 2, 2024](#) (8:45 p.m.): “I am HONOURED to be the sacrificial lamb every two terms to expose corruption. Our chair is prostituting us to Trump without LNC consent. DEFY!”

Ms. Harlos also engaged in the practice of “vague posting” about certain members who she felt had wronged her in some way, specifically Ms. Yeniscavich and Ms. Hays (some since deleted). Additionally, she made her animosity known about colleagues who voted “with the majority” and were, according to Ms. Harlos, nothing but “yes’ men” who followed “Dear Leader” (the LNC Chair) over a series of social media posts and references to them in both public and private emails.

On the Issue of Investigation Interference

From the very beginning, Ms. Harlos has mischaracterized, colored, or interfered with the IC’s investigation before the Board and the general public in an apparent attempt to manipulate the outcome of the Committee’s investigation. Moments after Mr. Haman made the motion, Ms. Harlos raised a point of order, citing a portion of the LNC Policy Manual that does not exist. She asserted that “a fair and impartial investigatory committee would not necessarily be members of the Board,” implying that an IC composed of members (Board members already named) might not be “fair or impartial.”

As the discussion progressed, particularly regarding the number of members who should serve, she asserted that “an odd number is not necessary because it still goes to the body.” Ms. Harlos, a

registered parliamentarian who has already undergone a similar process in the past and assisted other organizations in a limited capacity (LPCA), understands better than most that the IC's job is simply to investigate the scope of allegations placed before it and provide recommendations to its governing board (in this case the LNC) for consideration and action or inaction. However, she has deliberately misrepresented the situation to sway public opinion (all times PDT):

- [August 25, 2024](#) (3:04 p.m.): “You likely have heard that the LNC once again is trying to remove me for - in my view - doing the right thing in Colorado. Nope, not going to be talking about it presently.”
- [August 25, 2024](#) (10:53 p.m.): “Seriously call me about happened. You state chairs and boards have the power.”
- [August 26, 2024](#) (10:46 p.m.): “There is zero credible threat. This is a revenge job to try to get rid of a dissenter.”
- [August 26, 2024](#) (12:22 p.m.): “It’s crazy Af. The “charges” are going to be “lit” I’m sure. They already fucked up. Even appointing the committee is supposed to be in private or organization risks defamation. No, I’m not suing them but it just shows the bullshit. I have done nothing wrong. But I did keep rich brat RFK Jr off the Colorado ballot line.”
- [August 27, 2024](#) (8:16 a.m.): “I would do what I did with Colorado again. Period. Investigate me. You demean yourself and already broke RONR. If the Chair is “worried” about legal issues she’s already screwed the pooch. My fiduciary to the PARTY and DELEGATES is everything.”
- [August 27, 2024](#) (10:28 a.m.): “Guess what? No matter what petty revenge (which is going backfire spectacularly I promise) some think they are getting RFK JR IS NOT GOING TO BE ON COLORADO LIBERTARIAN BALLOT LINE. The LPCO board disgraced itself and the LNC is on precipe. I will do what I have to to save this Party.”
- [August 27, 2024](#) (1:36 p.m.): “People have called. I have called people. What are you going to do they ask? I don’t know. This move never should have happened and I’m considering all options. That’s not any kind of threat. You folks know I’m a person of duty to this Party and I have to decide where my fiduciary compels me. I did nothing wrong. And the way they ambushed me was ... beyond ignoble.”
- [August 28, 2024](#) (2:57 p.m.): “Chase is on ballot in Montana and Idaho! Colorado looking ever more foolish. I did my job and the LNC (not all) appointed someone who has been absolutely viscious to me to “investigate me” me. Does that sound right or fair? I DID NOTHING WRONG. No one can believe this is not (at this stage) a railroad job. And I helped save Region 1 reps and this is how I’m repaid. Shame. On. You.”
- [August 28, 2024](#) (8:35 p.m.): “I want to be clear while I’m glad a more fair IC was created (not one not of LNC which it should have been), I HAVE DONE NOTHING WRONG. I deserve commendation.”
- [September 10, 2024](#) (3:04 p.m.): “If they remove me for hurting feelz and doing right thing it’s far more close to reality and I’ll be very free to speak. Believe it or not, I hold my tongue now.”
- [September 12, 2024](#) (10:05 a.m.): “I can’t make this up but of course they never told me what my “crimes” are but these are it no matter how spun.”
- [September 15, 2024](#) (2:44 p.m.): “Zoho is way better but don’t tie yourself to national. They can cut you off. This is a one way protection and I only signed it due to being Secretary until

they purge me for daring to put the candidate on the ballot in Colorado. I would NOT sign this as a regular member. Each state should get its own CRM and request data dumps from national like before. ALL power is in national's hands right now.

- [September 15, 2024](#) (6:59 p.m.): “As you know, I've done ZERO wrong but does this LNC think having the “investigators” also be the “judges” is remotely Libertarian or will play well to anyone?? FFS”
- [September 16, 2024](#) (9:28 a.m.): “Or an LNC Inquisition. Or how DARE I get the candidate on the ballot!!!! The delegates don't matter!!!!”

Several of the above posts are particularly troublesome. First, Ms. Harlos admits to attempting to influence state chairs and boards while the investigation was underway and the report had yet to be written, let alone released. Several people later confirmed this, leading the Committee to believe the number of individuals in state leaderships contacted is in the double digits. Second, considering her qualifications and experience, Ms. Harlos should be more knowledgeable than most about the requirement to conduct all business in open session per the LP Bylaws (Article 7: National Committee, Section 15). Third, Ms. Harlos knows that a registered and well-respected parliamentarian oversees the IC, confirming the absence of any RONR violations. Fourth, she should understand that the IC's purpose is to investigate and determine if violations occurred, which would then result in charges. All of this implies that she is either intentionally lying or, in reality, significantly less qualified than she portrays herself to be. Lastly, she claims the IC was predetermined retaliation rather than a natural consequence of her actions.

The most egregious example, however, may be an email Ms. Harlos sent on the LNC Business List the day after the IC was formed:

From: LP Secretary <secretary@lp.org>
Sent: Monday, August 26, 2024 2:47 AM
To: LNC Business <lnc-business@lp.org>; 4eb01eb9.lp.org@amer.teams.ms <4eb01eb9.lp.org@amer.teams.ms>; businesslist-forward <businesslist-forward@lp.org>
Subject: Preserving point of Order

Last convention already determined this would be breach of continuing nature.

A fair process including persons known for BOTH integrity and impartiality are required on an IC. Continue with this process without this requirement FOR ALL and you risk parliamentary Pascal's wager.

And I know enough of you well enough that I know you know it's wrong.

That's all I'll say on the matter. I was physically ill at the end and do not believe I articulated it as well though I did raise.

These things bring the party together in ways that are usually unintended.

Talk to you soon.

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Ms. Harlos' suggestions of a lack of “fair process” and a “parliamentary Pascal's Wager” are particularly disingenuous. In 2021, when she faced a similar situation, she sought a respected parliamentarian's opinion during an arguably improperly done process; that same parliamentarian is the one currently advising the Committee. In his written opinion, Mr. Jacobs cited RONR (63:5), which notes that “A member or officer has the right that allegations against his good name shall not be made except by charges brought on reasonable ground. If thus accused, he has the right of due process—that is, informed of the charge and given time to prepare a defense, to appear and defend himself, and to be treated fairly.” Mr. Jacobs went on to explain that the issues with the removal stemmed from a lack of specific actions, a lack of notice, and a lack of a trial. He concluded “that, even singularly, any of these grounds are sufficient to

cause the motion to remove Ms. Harlos to be null and void. Collectively, they certainly do as well.” Shortly after her reelection, delegates raised a point of order at the 2022 Libertarian Party National Convention, suggesting that Ms. Harlos’ removal “should have had full due process, including a trial.” Eventually, the Convention Chair was forced to state that Ms. Harlos’ removal had been voted out of order by the delegates.

It’s important to note that Mr. Jacobs explicitly stated in the previously mentioned opinion that, given the mechanism in place at the time, an IC was not necessary, provided the process was followed and respected. Furthermore, the Convention delegates never asserted the ability to challenge an *ex post facto* process that involved the proper formation of an IC. Mr. Jacobs’ 2021 opinion even stated that he excepted the IC as a basis for a subsequent challenge.

The LNC Policy Manual, Section 1.01, Subsection 4), Removal From Office, underwent a clear amendment in 2022, stating that the “process for removing Officers and At-Large Members shall be the trial procedure as outlined in the Party’s parliamentary authority.” Article 16 of the LP Bylaws establishes that authority as “the current edition of Robert’s Rules of Order, Newly Revised.” Given her direct experience, Ms. Harlos is unquestionably knowledgeable on the subject. As a result, her accusation that the LNC Chair is “breaking RONR” is baffling for two main reasons. First, the LNC created the IC, not the LNC Chair; in fact, she expressly abstained from the vote. Second, she is very clearly presented with the right to defend herself this time around, as well as the right to be informed of any charges (should they be adopted).

Ms. Harlos’ constant public threats of legal action against the LNC Chair and the LNC itself, if she considers the outcome of this process unfavorable, have been arguably more abhorrent. The posts below, as well as numerous private and public emails threatening legal action, clearly aim to influence and intimidate members into voting against charges, even if they deem them warranted. Needless to say, a statement claiming that something “is not a threat” does not nullify the threat any more than starting a sentence with the phrase “with all due respect” and proceeding to insult the person one is speaking to does.

- [August 27, 2024](#) (1:46 p.m.): “I have noticed JFC to be rescinded. It will likely loose. I noticed my inquisition to be rescinded. It goes no facially valid grounds amongst other things. It will loose though if Chair were wise on this she'd make sure re-done right. If we are really wink wink concerned about legal issues.”
- [August 27, 2024](#) (5:46 p.m.): “If the Investigatory Committee “charges” me and LNC accepts it, I spoke with attorney today and have more lined up. This is retaliation and I will NOT go down without a fight. This is NOT a threat. I DID NOTHING WRONG, and people have gotten away with this for far too long. Of course I might not be “charged.” They might do the right thing. State chairs are behind me that never thought they would be. I may start legal defense fund (refunds if not needed).”
- [September 12, 2024](#) (2:29 p.m.): “I likely have a CO lawyer if I'm attempted to be removed for putting our candidate on the ballot in CO. I will not be fucked over. NO THIS ISN'T A THREAT but I will defend myself. I will not roll over. The LNC had a fiduciary duty, most particularly the Chair PERSONALLY, to defend me not have a kangaroo court.”
- [September 13, 2024](#) (1:07 p.m.): “Malagon being so openly hostile while chairing an “impartial” committee could be putting the LNC at great legal risk. It's really bad faith. They

have gotten themselves into deep shit if I choose to pursue. Angela, thank your bulldog. He fucked up.”

- [September 13, 2024](#) (1:11 p.m.): “So functional and not embarrassing and against the bylaws. With [Malagon] chairing the IC, the LNC just got into real legal trouble,”
- [September 13, 2024](#) (1:14 p.m.): “[Malagon] just crossed the line into real legal trouble since he allegedly chairs an "impartial committee.” Angela you are smarter than that.”
- [September 13, 2024](#) (1:19 p.m.): “[Malagon] can’t be so openly hostile and chair an “instigative committee.” Lawsuit waiting to happen.”

Despite their numerousness, the Committee could have easily added to the examples above, but it chose not to do so because those provided seem more than sufficient.

Conclusion

Occasional mistakes, imprudence, or lapses of judgment are not uncommon amongst leadership in any organization. Neither is the contrition or attempted remedy that usually follows. One of the Committee’s concerns, however, was the disconcerting reality that Ms. Harlos wholeheartedly rejects even the smallest of possibilities that she did anything wrong; no remorse is coming. During her interview, for instance, when asked by the Committee Chair if she had any regrets submitting the Certificate of Nomination prematurely against the LNC Chair’s directive, she yelled, “Absolutely not! And I would do it fifty million times over again!” When the Committee Chair asked Ms. Harlos if she would still disobey the LNC Chair and submit the paperwork, knowing everything she now knew (specifically, the snowball effect her actions triggered and Mr. Kennedy ending his campaign bid), she yelled, “Abso-*FUCKING*-lutely!”

- [August 25, 2024](#) (3:11 p.m.): “And yes I did absolutely the right thing.”
- [August 25, 2024](#) (3:17 p.m.): “I’m not stopping that fight. Nothing will stop me.”

The issues and instances mentioned in this report barely scratch the surface of what could easily be considered to be within the Committee’s scope by any reasonable person even remotely familiar with this situation and Ms. Harlos’ history and pattern of problematic behavior. As a result, the Committee believes that the claims of Ms. Harlos’ “misconduct,” as outlined in the motion that led to the creation of the IC and the investigation’s scope, are well founded and merit serious consideration by the LNC.

Specifically, the Committee believes the following offenses warrant charges:

- 1) Ms. Harlos exceeded her duties as LNC Secretary, resulting in violations of the LNC Bylaws as outlined in *On the Issue of Official Duties*. Ms. Harlos deliberately defied the LNC Chair’s directive, resulting in violations of the LNC Bylaws as outlined in *On the Issue of the Certificate of Nomination* and *On the Issue of Official Duties* (which effectively robbed an affiliate of its autonomy).
- 2) Ms. Harlos harmed the LNC through various instances of misrepresentation and misconduct while in office, as outlined in *On the Issue of Breach of Fiduciary Duty*, *On the Issue of Misrepresentation*, *On the Issue of Decorum*, and *On the Issue of Investigation Interference*. Ms. Harlos invited litigation by ignoring the Chair’s directive, as outlined in *On the Issue of Breach of Fiduciary Duty*. Ms. Harlos took action outside of her role as LNC Secretary,

which she would otherwise not have been able to take if she did not hold the position, as outlined in *On the Issue of Misrepresentation*. Ms. Harlos repeatedly impugned the character and reputation of several LNC members in order to financially benefit in at least one known instance, as outlined in *On the Issue of Decorum*. Ms. Harlos knowingly mischaracterized, colored, and obstructed the Committee's investigation on multiple occasions with the aim of influencing the outcome, as outlined in *On the Issue of Investigation Interference*.

Recommendation(s)

Based on the aforementioned findings and conclusions, the Committee primarily recommends that Ms. Harlos resign as LNC Secretary effective immediately. This is the most preferable outcome, as it would spare all parties involved the time, effort, energy, and continued financial harm a trial per RONR would undoubtedly bring.

Should Ms. Harlos be unwilling to resign, the Committee additionally recommends that the LNC:

- 1) Adopt the amendments to the Policy Manual with Special Rules of Order noticed by Mr. McGee.
- 2) Adopt the charges and specifications as listed below.
- 3) Adopt the resolutions as listed below.
- 4) Adopt the Investigatory Committee's Report.
- 5) Temporarily suspend Ms. Caryn Ann Harlos' membership and participation in all Libertarian Party Committees pending the outcome of the trial to prevent further escalation, disruption, and hampering of the Libertarian National Committee's work (assuming the recommendation to adopt charges and specifications is well-taken by the majority of the Libertarian National Committee).

Charges & Specifications

Resolved, that when the meeting adjourns, it adjourns to Saturday, November 9, 2024 at 1:00 p.m. EDT to be held virtually.

Resolved, that Ms. Caryn Ann Harlos is hereby cited to appear at said adjourned meeting for trial, to show cause why she should not be removed from the office of secretary on the following charges and specifications:

Charge 1: Gross Misconduct In Office

Specification 1: In that Ms. Caryn Ann Harlos violated the autonomy of the Libertarian Party of Colorado by submitting names of the presidential and the vice presidential nominees to the Colorado Secretary of State (LP Bylaws, Article 5.5).

Specification 2: In that Ms. Caryn Ann Harlos failed to follow the legitimate instructions of the Libertarian National Committee Chair by filing paperwork regarding the presidential ticket, exclusive of the electors, with the Colorado Secretary of State (LP Bylaws, Article 6.5).

Charge 2: Conduct That Disturbs the Well-Being of the Libertarian Party, Hampers it in its work, and That Renders Ms. Caryn Ann Harlos Unfit for the Office of Secretary

Specification 1: In that, by filing the names of presidential and vice presidential nominees with the Colorado Secretary of State, Ms. Caryn Ann Harlos has exposed the Libertarian National Committee to litigation.

Specification 2: In that Ms. Caryn Ann Harlos has maligned various members of the Libertarian National Committee, specifically Mr. Adam Haman, and Ms. Angela McArdle, as detailed in *On the Issue of Misrepresentation*, *On the Issue of Decorum* and *On the Issue of Investigation Interference*.

Specification 3: In that Ms. Caryn Ann Harlos attempted to obstruct the investigation by falsely claiming that the convention had ruled regarding an investigating committee (Post of August 26, 2024, 3:47:13 a.m. MDT).

Resolved, that from the time official notification of this resolution is delivered to Ms. Caryn Ann Harlos' address until disposition of the case, all of Ms. Caryn Ann Harlos' authority, rights, and duties pertaining to the office of secretary and of all Libertarian Party Committees are suspended.

Resolved, that Mr. Jonathan McGee act as the manager for the Libertarian National Committee.

Charges & Specifications Adoption

On Sunday, October 6, 2024, at 12:00 p.m. EDT, the Committee adopted the charges and specifications individually as follows:

Charge 1: Gross Misconduct in Office, Specification 1: in that Ms. Caryn Ann Harlos violated the autonomy of the Libertarian Party of Colorado by submitting the names of the presidential and vice presidential nominees to the Colorado Secretary of State (LP Bylaws, Article 5.5).

Mr. Adrian F Malagon	Aye
Mr. Jonathan McGee	Aye
Mr. Pat Ford	Aye
Mr. Dustin Nanna	Nay
Mr. Steven Nekhaila	Nay

3-2-0-0 (Aye-Nay-Expressed Abstention-Not Voting)

Charge 1: Gross Misconduct in Office, Specification 2: in that Ms. Caryn Ann Harlos failed to follow the legitimate instructions of the Libertarian National Committee Chair by filing paperwork regarding the presidential ticket, exclusive of the electors, with the Colorado Secretary of State (LP Bylaws, Article 6.5).

Mr. Adrian F Malagon	Aye
Mr. Jonathan McGee	Aye
Mr. Pat Ford	Aye
Mr. Dustin Nanna	Abstain
Mr. Steven Nekhaila	Aye

Unanimously Adopted 4-0-1-0 (Aye-Nay-Expressed Abstention-Not Voting)

Charge 1: Gross Misconduct in Office

Mr. Adrian F Malagon	Aye
Mr. Jonathan McGee	Aye
Mr. Pat Ford	Aye
Mr. Dustin Nanna	Nay
Mr. Steven Nekhaila	Aye

4-1-0-0 (Aye-Nay-Expressed Abstention-Not Voting)

Charge 2: Conduct That Disturbs the Well-Being of the Libertarian Party, Hampers it in its work, and That Renders Ms. Caryn Ann Harlos Unfit for the Office of Secretary, Specification 1: in that, by filing the names of presidential and vice presidential nominees with the Colorado Secretary of State, Ms. Caryn Ann Harlos has exposed the Libertarian National Committee to litigation.

Mr. Adrian F Malagon	Aye
Mr. Jonathan McGee	Aye
Mr. Pat Ford	Aye
Mr. Dustin Nanna	Abstain
Mr. Steven Nekhaila	Aye

Unanimously Adopted 4-0-1-0 (Aye-Nay-Expressed Abstention-Not Voting)

Charge 2: Conduct That Disturbs the Well-Being of the Libertarian Party, Hampers it in its work, and That Renders Ms. Caryn Ann Harlos Unfit for the Office of Secretary, Specification 2: in that Ms. Caryn Ann Harlos has maligned various members of the Libertarian National Committee, specifically Mr. Adam Haman, and Ms. Angela McArdle, as detailed in *On the Issue of Misrepresentation*, *On the Issue of Decorum* and *On the Issue of Investigation Interference*.

Mr. Adrian F Malagon	Aye
Mr. Jonathan McGee	Aye
Mr. Pat Ford	Aye
Mr. Dustin Nanna	Aye
Mr. Steven Nekhaila	Aye

Unanimously Adopted 5-0-0-0 (Aye-Nay-Expressed Abstention-Not Voting)

Charge 2: Conduct That Disturbs the Well-Being of the Libertarian Party, Hampers it in its work, and That Renders Ms. Caryn Ann Harlos Unfit for the Office of Secretary, Specification 3: in that Ms. Caryn Ann Harlos attempted to obstruct the investigation by falsely claiming that the convention had ruled regarding an investigating committee (post of August 26, 2024, 3:47:13 a.m. MDT).

Mr. Adrian F Malagon	Aye
Mr. Jonathan McGee	Aye
Mr. Pat Ford	Aye
Mr. Dustin Nanna	Aye
Mr. Steven Nekhaila	Aye

Unanimously Adopted 5-0-0-0 (Aye-Nay-Expressed Abstention-Not Voting)

Charge 2: Conduct That Disturbs the Well-Being of the Libertarian Party, Hampers it in its work, and That Renders Ms. Caryn Ann Harlos Unfit for the Office of Secretary.

Mr. Adrian F Malagon	Aye
Mr. Jonathan McGee	Aye
Mr. Pat Ford	Aye
Mr. Dustin Nanna	Aye
Mr. Steven Nekhaila	Aye

Unanimously Adopted 5-0-0-0 (Aye-Nay-Expressed Abstention-Not Voting)

Resolution Adoptions

On Sunday, October 6, 2024, at 12:00 p.m. EDT, the Committee unanimously adopted each resolved clause item as follows:

Recommendation that the Libertarian National Committee adopt the following resolutions on the adjourned meeting, the one citing Ms. Caryn Ann Harlos to appear, the one suspending her authority rights and duties as Libertarian National Committee Secretary and from all Libertarian Party committees, and the one appointing the manager.

Mr. Adrian F Malagon	Aye
Mr. Jonathan McGee	Aye
Mr. Pat Ford	Aye
Mr. Dustin Nanna	Abstain
Mr. Steven Nekhaila	Aye

4-0-1-0 (Aye-Nay-Expressed Abstention-Not Voting)

Report Adoption

On Sunday, October 6, 2024, at 12:00 p.m. EDT, the Committee unanimously adopted the Investigatory Committee Final Report with vote counts and signatures as follows:

Mr. Adrian F Malagon	Aye
Mr. Jonathan McGee	Aye
Mr. Pat Ford	Aye
Mr. Dustin Nanna	Aye
Mr. Steven Nekhaila	Aye


5-0-0-0 (Aye-Nay-Expressed Abstention-Not Voting)

On Sunday, September 29, 2024, the Committee informally adopted the report and then submitted it to the LNC Chair, LNC Counsel, and the EPCC to ensure it was free of any potentially sensitive or compromising information before officially adopting it and releasing it to the entire LNC for consideration.

In Liberty,



Mr. Adrian F Malagon
Chair, Investigatory Committee
Region Four Alternate, Libertarian National Committee



Mr. Jonathan McGee
Secretary, Investigatory Committee
Region Two Representative, LNC



Mr. Dustin Nanna
Member, Investigatory Committee
Region Three Representative, LNC



Mr. Pat Ford
Member, Investigatory Committee
Region Six Representative, LNC



Mr. Steven Nekhaila
Member, Investigatory Committee
At-Large Representative, LNC