



Amicus Brief in Support of Removal of Caryn Ann Harlos as LNC Secretary

To the Libertarian National Committee:

We, the undersigned, submit this amicus brief in support of the motion to remove Ms. Caryn Ann Harlos from her position as Secretary of the Libertarian National Committee (LNC). Our support is based on the following key points derived from the Investigatory Committee's findings:

1. Violation of Organizational Structure and Autonomy:

Ms. Harlos acted unilaterally in submitting nomination paperwork to the Colorado Secretary of State, in direct contravention of explicit directives from the LNC Chair. This action not only violated the LP Bylaws but also the autonomy of the Libertarian Party of Colorado (LPCO), undermining the foundational principles of state affiliate independence within the Libertarian Party framework.

2. Legal and Financial Exposure:

Her actions have exposed the LNC to potential litigation, both from internal party disagreements and external electoral challenges. The unauthorized nomination filings could lead to lawsuits under Colorado election laws, potentially resulting in significant legal fees and reputational damage to the LP.

3. Breach of Fiduciary Duties:

As an officer, Ms. Harlos had a fiduciary responsibility to act in good faith and in the best interest of the LNC. Her defiance of the Chair's instructions and creation of legal liabilities for the organization clearly breaches these duties, risking harm to the party's operational effectiveness and financial stability.

4. Decorum and Public Conduct:

Ms. Harlos's public statements and behavior on social media and in other forums have been detrimental to the party's image, morale, and unity. Her persistent public criticism of fellow LNC

members and the Chair has created an environment of discord rather than the collaboration expected from a national officer.

5. Obstruction of Investigation:

By making misleading public statements about the investigatory process, Ms. Harlos attempted to influence the outcome or public perception of the investigation, which could be seen as an obstruction of justice within the party's internal governance.

Conclusion: Given the severity and breadth of these offenses, we believe that Ms. Harlos's removal from her position as LNC Secretary is necessary not only to address the specific acts of misconduct but also to restore trust, integrity, and order within the Libertarian National Committee. Her actions have shown a disregard for party rules, collegial respect, and the legal ramifications of her decisions, which are antithetical to the principles and operations of our organization.

Recommendation: We urge the LNC to adopt the charges and specifications against Ms. Harlos and proceed with her removal to safeguard the party's interests, legal standing, and future electoral integrity. Her tenure has proven to be more divisive than unifying, and her removal would signal a commitment to accountability and adherence to the party's bylaws and ethical standards.

Respectfully submitted,

Montana Mises Caucus of the Libertarian Party