

**LIBERTARIAN NATIONAL COMMITTEE
JUDICIAL COMMITTEE**

CARYN ANN HARLOS

PETITIONER

v.

LIBERTARIAN NATIONAL COMMITTEE

RESPONDENT

**BRIEF PRO SE AMICUS CURIAE IN SUPPORT OF THE
PETITIONER**

INTRODUCTION

As the former Treasurer of the Libertarian National Committee (2022-2024), having served alongside Chair Angela McArdle for two years, I submit this amicus brief in support of the PETITIONER's appeal of her suspension from the position of LNC Secretary. My direct experience working with both Chair McArdle and Secretary Harlos provides unique insight into the underlying dynamics of this case and the culture of intimidation and fear on the LNC. The attempted removal of Secretary Harlos represents not merely an isolated incident but rather the culmination of a systematic effort to silence dissenting voices within the Party and consolidate power through procedural manipulation and selective enforcement of rules.

STATEMENT OF FACTS

The facts presented in Secretary Harlos's appeal demonstrate a pattern of targeted harassment and retaliation against those who oppose the current leadership's direction. Of particular relevance:

1. The LNC conducted Secretary Harlos's trial in executive session despite clear bylaws prohibiting such action except for specific circumstances not present here. These specific circumstances were never specified and, in fact, deny her opportunity for appellate review which is an absolute right that she has. In so doing, the LNC may have exposed itself to litigation, which is actually

one of the pretexts for removing her. It is not hard to libel someone, the LNC should be sure that it had the truth before accusations. No Libertarian should have an issue with that.

2. The charges against Secretary Harlos stem primarily from her fulfillment of her duties as Secretary in submitting nomination paperwork for the Party's legitimate presidential nominee, while being kept in the dark by the Chair. This was a recurring pattern under Chair McArdle.
3. The suspension occurred without proper due process, including denial of adequate time to prepare a defense and improper restriction of her participation rights during the proceedings as detailed in her Petition.
4. The LNC's main point is that Caryn Ann Harlos is disturbing the peace of the Party. No, in fact the LNC is disturbing the peace of the party. This brief will lay out the fact that this party has been in turmoil since Chair McArdle entered leadership.

ARGUMENTS

I. The Current LNC Chair Is the Primary Source of Conflict Within the Party

The evidence demonstrates that Chair McArdle has created an environment of division and dysfunction within the Party:

A. Financial Mismanagement and Misrepresentation

- Repeatedly made false claims about CRM-related losses exceeding \$200,000, despite correction by the Treasurer with supporting data
- Changed membership calculation methods to obscure declining numbers under her leadership
- Hired her romantic partner as a fundraiser without proper committee process, then demanded contract renewal despite deteriorating fundraising performance

B. Procedural Violations

- Made unilateral decisions regarding convention speakers (including Trump, Vivek, and RFK Jr.) without required LNC votes and misleading the Convention Oversight Committee (CoC) about the true nature of the Trump visit, which was planning beginning in November of 2023, despite her public declaration that he was invited in April of 2024. She also reiterated this when she declared that the LNC did not have time to vote on the matter, even though it was required.
- Entered into the RFK Jr. joint fundraising agreement without showing the contract to the LNC
- Appointed inexperienced Mises Caucus members to key positions over qualified candidates

C. Creation of Hostile Environment

- Maintained a private Discord channel for Mises-aligned LNC members to coordinate actions against other members

- Plays favorites among the board. Allowing her sycophants to make outrageous statements regarding other board members, without repercussions, while attacking board members who bring up legitimate discussions in opposition to her agenda.
- Consistently dismisses criticism as coming from "haters", leaked information and doxed members who offer legitimate criticisms of her leadership. Routinely attacks lifetime members, and major donors to the party, current and former LNC members, including the Petitioner, the author of this brief, and the current LNC Treasurer. She does so on the public list, on her social media, and rallies her troops to join in on the attacks.
- Uses parliamentary procedure to silence opposition, including improper use of "out of order" rulings or outright refusal to hear points of order in a quantity never before seen in this party.

II. The LNC Has Abandoned Its Oversight Role in Favor of Caucus Loyalty

The current LNC has demonstrated a pattern of rubber-stamping Chair McArdle's initiatives without proper scrutiny:

A. Selective Enforcement of Rules

- Supports affiliate lawsuits only when benefiting Mises-aligned groups
- Applies contradictory reasoning to similar situations based on factional alignment
- Failed to properly oversee significant contracts and agreements

B. Financial Oversight Failures

- Approved questionable expenditures without proper vetting
- Ignored Treasurer's corrections of misrepresented financial data
- Failed to address declining fundraising and membership numbers

III. The Suspension of Secretary Harlos Represents Systematic Suppression of Dissent

The action against Secretary Harlos follows a clear pattern of silencing opposition:

A. Procedural Manipulation

- Increased motion co-sponsor requirements to prevent discussion of opposition viewpoints
- Improperly excluded members from executive sessions
- Used RONR "trickery" to prevent legitimate appeals of chair rulings and only using parliamentarians that support her outcome, ignoring neutral parliamentarians who have supported the Party for years.

B. Targeted Harassment

- Retaliated against Secretary Harlos for opposing the RFK Jr. joint fundraising committee
- Used executive session improperly to shield proceedings from public view

- Applied selective enforcement of rules regarding social media and public statements

CONCLUSION

The suspension of Secretary Harlos represents not merely a procedural dispute but rather the culmination of systematic efforts to consolidate power and silence dissent within the Party. This action is clearly a political witch hunt, extending the current leadership's pattern of systematically silencing critics. If allowed to stand, this suspension will not end with Secretary Harlos - credible reports suggest plans to remove other dissenting voices, including the current Treasurer and Vice-Chair. The Judicial Committee must act to prevent the continued degradation of proper procedure and protect the fundamental right of Party officers to fulfill their duties without fear of retribution. The Mises Caucus currently has the super-majority of the LNC. This is not enough for them, they must eliminate dissent.

The JC, in this case, is not limited in its scope of review merely for bylaws violations as it is with member submitted appeals. It can look at the big picture, unclean hands motives, proportionality, and the good of the Party. It needs to do so. The biggest offenders of the peace and tranquility, of the Party, and the breaking of the rules, are the accusers.

Respectfully submitted,

Todd Hagopian

Former LNC Treasurer

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