

**LIBERTARIAN NATIONAL COMMITTEE  
JUDICIAL COMMITTEE**

**CAYN ANN HARLOS**  
Duly Elected Secretary of the Libertarian National Committee

**PETITIONER**

v.

**LIBERTARIAN NATIONAL COMMITTEE**

**RESPONDENT**

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

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~~ADDENDUM~~

I would like to file a brief addendum regarding the FEC portion of my previously filed Amicus Brief.

The distribution agreement allocating 90% of donations to the independent candidate raises numerous red flags. I believe this arrangement violates multiple Federal Election Commission (FEC) rules and regulations, putting our party at significant legal risk.

Potential FEC Rule Violations:

1. 11 CFR 102.17(c)(2) - Allocation formula The 90-10 split does not appear to represent a reasonable allocation based on the fundraising share of each committee.
2. 11 CFR 110.1(h) - Contributions to committees making independent expenditures This arrangement may exceed limits on contributions to committees making independent expenditures.
3. 11 CFR 110.1(d) - Contributions to authorized political committees of candidates The agreement potentially circumvents the \$3,300 per-election limit to the candidate's authorized committee.
4. 11 CFR 109.20 - Coordinated communications Such a favorable agreement could be seen as evidence of coordination between the party and the supposedly independent candidate.
5. 11 CFR 109.21 - Coordinated communications as in-kind contributions If coordination is found, these funds could be considered in-kind contributions, violating contribution limits.
6. 11 CFR 110.9 - Violation of limitations This scheme may violate the general prohibition on knowingly accepting contributions in excess of limitations.

7. 11 CFR 104.13 - Reporting of receipts and disbursements The unusual nature of this agreement may lead to improper reporting of funds raised and transferred.
8. 11 CFR 300.2(c)(3) - Definition of agent The agreement might imply that the candidate is acting as an agent of the party, violating independence rules.
9. 11 CFR 102.5(a) - Organizations financing political activity in connection with Federal and non-Federal elections If any non-Federal funds are involved, this arrangement could violate rules on segregation of Federal and non-Federal activities.
10. 11 CFR 110.1(c)(5) - Earmarking and direction of contributions The structure of this JFC could be seen as improperly earmarking or directing contributions to the candidate.
11. 11 CFR 114.4(c)(6) - Endorsements This agreement could be interpreted as an implicit endorsement, violating rules for independent candidates.
12. 11 CFR 300.61 - Federal funds required for certain public communications If the JFC funds are used for certain public communications, it may violate restrictions on funding sources.

Given these potential violations, I strongly urge the Judiciary Committee to reject this joint fundraising agreement. The legal and reputational risks far outweigh any potential financial benefits. We should either renegotiate the terms to ensure compliance with FEC regulations or pursue alternative, legally sound fundraising strategies.

Thank you for your consideration of this critical matter.

**Respectfully Submitted,**

**Former National Treasurer**

**Todd Hagopian**