

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**LIBERTARIAN NATIONAL
COMMITTEE, INC.,**

Plaintiff,

v.

**MIKE SALIBA, RAFAEL WOLF,
GREG STEMPELE, ANGELA
THORNTON-CANNY, JAMI
VAN ALSTINE, MARY
BUZUMA, DAVID CANNY,
and JOSEPH BRUNGARDT,**

Defendants.

Case No. 23-cv-11074

Hon. Judith E. Levy

**DEFENDANTS' RESPONSE TO MOTION FOR PRELIMINARY
INJUNCTION**

The defendants respectfully request that this Court deny the Libertarian National Committee's (LNC's) motion to preliminarily enjoin them from using the name "Libertarian Party." The LNC is unlikely to prevail on its claims under the Lanham Act for at least three reasons, and the equities do not otherwise favor granting its requested relief.

First, the Sixth Circuit has held that the Lanham Act would run afoul of the First Amendment's free-speech protections if construed to apply beyond the limited context of commercial speech. *Taubman Co. v. Webfeats*, 319 F.3d 770, 774 (6th Cir.

2003). As a result, noncommercial political speech is outside the scope of the statute and cannot constitute trademark infringement. *See Radiance Found., Inc. v. Nat'l Ass'n for Advancement of Colored People*, 786 F.3d 316, 327 (4th Cir. 2015) (“trademark infringement is not designed to protect mark holders from consumer confusion about their positions on political or social issues”); *All. for Good Gov't v. Coal. for Better Gov't*, 901 F.3d 498, 506 n.8 (5th Cir. 2018) (citing cases in the *Taubman* line and suggesting, without reaching the issue, that the Lanham Act does not apply to political speech); *Tax Cap Committee v. Save Our Everglades*, 933 F. Supp. 1077, 1080 (S.D. Fla. 1996) (circulating initiative petitions is not a “service” for purposes of the Lanham Act); *cf. Buckley v. Valeo*, 424 U.S. 1, 14 (1976) (noting that political speech, including contributing and soliciting contributions to political campaigns, is among “the most fundamental First Amendment activities”). Because the allegedly infringing speech and activities identified in the complaint in this case are purely political in nature, the LNC’s claims fail as a matter of law.

Second, even if the Lanham Act applies, the defendants have a contractual right to use the name “Libertarian Party” and therefore are not infringing the LNC’s mark by doing so. As explained in the accompanying brief, the defendants are all members of the Libertarian Party of Michigan (LPM), and as such are authorized to use the LNC’s marks under article 5 of the bylaws of the Libertarian Party. The LNC’s claim that it has “constructively disaffiliated” the defendants is contrary to the plain

language of the bylaws, which require a $\frac{3}{4}$ supermajority vote for disaffiliation and prohibit the LNC from abridging the autonomy of state-level affiliates.

Third, the defendants' use of the name "libertarian party" is not likely to confuse potential LPM donors and dues payers. The ongoing governance dispute within the LPM is well known within libertarian circles. It has been covered in mainstream publications as well as publications focusing specifically on libertarian politics, and has been explained to the LPM membership in numerous direct communications from defendants Saliba and Brungardt. Further, the defendants and their supporters not only acknowledge — but expressly emphasize — the fact that the LNC has backed their rival faction. The evidence strongly suggests that many individuals who have donated to the defendants did so at least in part because they believe the LNC's interference with a state-level affiliate is inappropriate and contrary to the Libertarian Party bylaws.

Finally, even if the LNC could establish a likelihood of success on the merits, the equities would still weigh against enjoining the defendants from using the name "Libertarian Party" while this case proceeds. Doing so would substantially undermine the defendants' claim that they are the legitimate elected leaders of the LPM, and would therefore constitute unwarranted judicial interference in the affairs of a political party. *See Heitmanis v. Austin*, 899 F.2d 521, 525 (6th Cir. 1990) ("Courts have historically been reluctant to intervene in intra-party disputes.").

Moreover, to the extent the defendants have violated state law or federal campaign-finance law through their use of the name (as the LNC erroneously claims), any such violation would be more appropriately addressed in the pending state court action regarding LPM's internal governance dispute or in the pending matter that LNC chair Angela McArdle has filed with the Federal Election Commission.

For these reasons, as set forth more fully in the accompanying brief, Defendants respectfully request that the Court deny plaintiff's motion for a preliminary injunction.

DATED: July 10, 2023

Respectfully submitted,

By: /s/ C. Nicholas Curcio
C. Nicholas Curcio
CURCIO LAW FIRM, PLC
16905 Birchview Drive
Nunica, MI 49448
Telephone: (616) 430-2201
ncurcio@curciofirm.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**LIBERTARIAN NATIONAL
COMMITTEE, INC.,**

Plaintiff,

v.

**MIKE SALIBA, RAFAEL WOLF,
GREG STEMPELE, ANGELA
THORNTON-CANNY, JAMI
VAN ALSTINE, MARY
BUZUMA, DAVID CANNY,
and JOSEPH BRUNGARDT,**

Defendants.

Case No. 23-cv-11074

Hon. Judith E. Levy

**DEFENDANTS' BRIEF IN SUPPORT OF RESPONSE TO MOTION
FOR PRELIMINARY INJUNCTION**

TABLE OF CONTENTS

Index of Exhibits	ii
Statement of Issues Presented	iii
Controlling and Most Appropriate Authorities	v
Introduction	1
Statement of Facts.....	1
A. The rise and fall of Andrew Chadderdon	1
B. Mr. Chadderdon clings to power and splits the state party	4
C. The LNC backs Mr. Chadderdon, “constructively disaffiliates” LPM’s elected leaders, and threatens to sue them for trademark infringement.	7
D. LPM’s elected leaders fight back against the LNC with broad support from party members in and out of state.....	8
Legal Standard.....	11
Argument	11
A. Injunctive relief is not warranted because the LNC is unlikely to succeed on the merits of its claims.....	11
1. The noncommercial speech and activities of a political organization are outside the scope of the Lanham Act.	11
2. Even if the Lanham Act applies, the defendants have the contractual right to use the name “Libertarian Party” because they are members of the LNC’s state-level affiliate, and because the LNC lacks the power of “constructive disaffiliation.”	15
3. The defendants’ use of the name “Libertarian Party” is not confusing because potential donors and dues payers are aware of the governance dispute within the state party and understand that the LNC supports Mr. Chadderdon	18
B. Even if the LNC were likely to prevail on the merits, the equities weigh against the broad preliminary injunction it seeks	23
Conclusion	25

INDEX OF EXHIBITS

Declaration of Angela Thornton	1
Declaration of Brandon Warzybok	2
Declaration of Brian Ellison	3
Declaration of Jami Van Alstine	4
Declaration of Michael Saliba	5
Bylaws of the Libertarian Party of Michigan (June 26, 2021)	6
Complaint in <i>Comerica Bank v Libertarian Party of Michigan, et al.</i>	7
Draft minutes of the April 2023 LPM convention	8
Emails from LPM chairs to LPM members	9
Email from Attorney Zito regarding constructive disaffiliation.....	10
FEC complaint filed by LNC Chair McArdle (MUR 8130)	11
Kelly Weill, Libertarian Party is Fighting a Civil War Over its Right- Wing Mises Caucus, <i>The Daily Beast</i> , September 29, 2022	12
Incfight.org page printouts.....	13
michiganlp.net page printouts	14
Minutes of the July 2022 LPM convention	15
Minutes of LNC executive committee meeting, February 5, 2023	16
Minutes of LNC executive committee meeting, March 8, 2023	17
Minutes of LNC executive committee meeting, April 8, 2023.....	18
Mises Caucus strategic action plan for 2022 national convention (Excerpts)	19
Resignation letter from former LPM Chair Yow	20
<i>Robert's Rules of Order</i> (Excerpts)	21
Sampling of articles published by <i>Independent Political Report</i>	22
Spreadsheet of donations to defendants (February 2023–June 2023)	23

ISSUES PRESENTED

1. Whether the Lanham Act extends to noncommercial political speech like soliciting political donations, filing campaign-finance paperwork, and disseminating political articles and information.

Plaintiff answers: Yes

Defendants answer: No

This Court should answer: No

2. Whether the LNC can “constructively disaffiliate” LPM members, without following the disaffiliation process in article 5 of the Libertarian Party bylaws, as a means of taking sides in an intraparty state-level governance dispute.

Plaintiff answers: Yes

Defendants answer: No

This Court should answer: No

3. Whether the defendants’ use of the name “Libertarian Party” is likely to confuse potential LPM donors and dues payers, given the extensive effort defendants have made to inform LPM members of the ongoing intraparty governance dispute and the LNC’s backing of a rival faction.

Plaintiff answers: Yes

Defendants answer: No

This Court should answer: No

4. Whether the equities favor granting a broad injunction that would prohibit the defendants from using the name of the political party to which they belong and in which they serve as elected leaders.

Plaintiff answers: Yes

Defendants answer: No

This Court should answer: No

CONTROLLING AND MOST APPROPRIATE AUTHORITIES

Argument A.1:

All. for Good Gov't v. Coal. for Better Gov't,
998 F.3d 661 (5th Cir. 2021) (Dennis, J., dissenting).

All. for Good Gov't v. Coal. for Better Gov't, 901 F.3d 498 (5th Cir. 2018).

Buckley v. Valeo, 424 U.S. 1 (1976)

Radiance Found., Inc. v. Nat'l Ass'n for Advancement of Colored People,
786 F.3d 316 (4th Cir. 2015).

Taubman Co. v. Webfeats, 319 F.3d 770 (6th Cir. 2003).

Argument A.2:

Libertarian Party Bylaws, article 5.

Argument A.3:

Homeowners Grp., Inc. v. Home Mktg. Specialists, Inc.,
931 F.2d 1100 (6th Cir. 1991).

Innovation Ventures, LLC v. N.V.E., Inc., 694 F.3d 723 (6th Cir. 2012).

Nartron Corp. v. Stmicroelectronics, Inc., 305 F.3d 397 (6th Cir. 2002).

Taubman Co. v. Webfeats, 319 F.3d 770 (6th Cir. 2003).

Argument B:

Carey v. Fed. Election Comm'n, 791 F. Supp. 2d 121 (D.D.C. 2011).

Heitmanis v. Austin, 899 F.2d 521 (6th Cir. 1990).

INTRODUCTION

In moving for a preliminary injunction, the LNC claims that this “is a straightforward case of trademark infringement.” ECF 12, Page I.D. 385. But even a cursory review of the complaint reveals that’s not so. Unlike in an ordinary trademark case, the plaintiff and the defendants are not commercial competitors. Rather, the defendants are long-time members — and, in the eyes of many, the rightful leaders — of the political party that serves as the plaintiff’s state-level affiliate. Given this fact, the LNC’s attempt to use the Lanham Act to silence their political activity is well beyond the intended scope of the statute and is also contrary to the bylaws of the Libertarian Party.

STATEMENT OF FACTS

A. The rise and fall of Andrew Chadderdon.

In the summer of 2022, the two highest ranking officers of the Libertarian Party of Michigan (LPM) resigned from their leadership positions just weeks before the party’s candidate nominating convention. Ex. 5 at 2 (Saliba Declaration). In a letter explaining his decision, former-Chair Tim Yow cited hostility from the third ranking LPM officer at that time, Mr. Andrew Chadderdon, and concern with the ideology of the political caucus to which he belonged. Ex. 20 (Yow Letter). That caucus, known as the Mises Caucus, had just taken control of the national party by

winning most of the leadership positions on the LNC. Ex. 1 at 7 (Thornton Declaration).

As a result of the resignations, Mr. Chadderdon ascended to the position of acting chair pursuant to the LPM bylaws. Ex. 5 at 2 (Saliba Declaration). Other members of the LPM executive committee were concerned that Mr. Chadderdon would not be able to effectively lead the party because of his poor relationship with party members and his poor performance in his prior role of LPM political director. *Id.* at 2–3. Considering these concerns, party leaders notified Mr. Chadderdon in mid-June that they intended to call a vote-of-no confidence to remove him from the executive committee during the July 9 convention. *Id.* at 3. They further indicated their intent to conduct elections to fill the vacancies on the executive committee during and asked that written notices of the elections be sent to party members. *Id.*

Mr. Chadderdon openly opposed these efforts and attempted to thwart them. *Id.* As part of his strategy, he refused to send notices of the elections as requested, so he could then argue that the elections were improper. *Id.* In his opening comments at the convention, Mr. Chadderdon made clear that he had no intention to allow votes on his removal or on the filling of executive committee vacancies. *Id.* Instead, he proposed a convention agenda that did not include either of those items. *Id.*

When a motion was made from the floor to approve a substitute agenda that included both items, Mr. Chadderdon ruled the motion out of order on the grounds

that a notice of the intent to fill the vacancies had not been given. *Id.*; Ex. 15 at 1 (July 2022 Convention Minutes). Immediately thereafter, a subsequent motion was made to appeal Mr. Chadderdon’s ruling to the full assembly on the grounds that the party customarily allowed items to be added to convention agendas by motion from the floor. Ex. 5 at 4 (Saliba Declaration); Ex. 15 at 1 (July 2022 Convention Minutes). Mr. Chadderdon then ruled that motion out of order too, citing a provision of *Robert’s Rules of Order* that prohibits the introduction of “frivolous or absurd” motions. Ex. 15 at 1 (July 2022 Convention Minutes); Ex. 21 at 4 (*Robert’s Rules*).

The delegates responded to Mr. Chadderdon’s second ruling by moving to replace him as convention chair. Ex. 5 at 4 (Saliba Declaration). That motion passed by a standing vote. Ex. 15 at 1 (July 2022 Convention Minutes). Under the leadership of the replacement chair, defendant Joe Brungardt, the convention delegates then proceeded to remove Mr. Chadderdon from the executive committee through a vote-of-no confidence and to fill the vacancies on the executive committee. *Id.* at 2–4. The motion in support of the vote-of-no confidence stated, among other things, that Mr. Chadderdon had “consistently used the Bylaws and *Robert’s Rules* as a weapon against those who oppose him.” *Id.* at 3. After discussion, a vote on the motion was called — without any procedural objection from Mr. Chadderdon or others on the floor — and was approved by over two-thirds of the delegates. *Id.* Accordingly, First Vice Chair Brungardt ascended to the position of acting chair,

and Mike Saliba was elected to the position of first vice chair shortly thereafter. *Id.* at 3. Accordingly, Mr. Brungardt, Mr. Saliba, and the other individuals elected to the executive committee became the new leadership of the LPM.

B. Mr. Chadderdon clings to power and splits the state party.

Following the convention, the newly elected executive committee met and conducted its work without objection for four months. Ex. 5 at 4 (Saliba Declaration). Then, in mid-November, Mr. Chadderdon sent a letter to the LPM’s judicial committee asking it to overturn his removal from the executive committee and to void the results of the vacancy elections conducted at the convention. ECF No. 12-29, Page I.D. 527 (Judicial Committee Decision). The judicial committee is a body created by the LPM bylaws to “decide cases involving alleged violations of the[] bylaws or resolutions.” Ex. 6 at 6 (LPM Bylaws). At the time it received and acted on Mr. Chadderdon’s request, it consisted of three of Mr. Chadderdon’s fellow Mises Caucus members. Ex. 5 at 5 (Saliba Declaration).

In support of his request to the judicial committee, Mr. Chadderdon alleged that the votes to remove him from office and fill vacancies at the July convention were unlawful because the convention was a “special meeting” for purposes of the bylaws and *Robert’s Rules* and, as a result, business could only be conducted if it was specifically referenced in the written document calling the meeting. *Id.* at 528. Despite the extensive discussion of procedural issues during the July convention and

the executive committee meetings leading up to it, no one (including Mr. Chadderdon) had previously suggested this interpretation of the party's rules. Ex. 5 at 5 (Saliba Declaration). Moreover, the interpretation is inconsistent with the fact that candidate nominating conventions are held at specified intervals as provided in the LPM bylaws, Ex. 6 at 6 (LPM Bylaws), and that the party has historically considered business items at candidate nominating conventions other than those listed in the call to convention, *see* Ex. 5 at 5 (Saliba Declaration).

In December 2022, the LPM judicial committee considered Mr. Chadderdon's request and ruled in his favor. ECF No. 12-29, Page I.D. 535. The judicial committee not only sided with Mr. Chadderdon on the merits, but also stated in its opinion that the "Executive Committee shall be reverted to its composition as of July 8th," the day before the convention took place. *Id.*

The release of the judicial committee opinion created substantial confusion within the party. Ex. 5 at 5 (Saliba Declaration). Although the judicial committee had existed for several decades, it had never previously claimed the authority to overrule decisions made by convention delegates. *See id.* at 5–6. Further, because the judicial committee is a "committee," *Robert's Rules of Order* indicates that its proper role is to "report its findings or recommendations to the assembly," not to order self-executing remedies. *Id.* at 6; Ex. 21 at 6 (*Robert's Rules*). Accordingly, while some members of the executive committee were initially under the impression that they

had been removed from their committee seats, they eventually concluded that was not the case. Ex. 5 at 6 (Saliba Affidavit). Rather, they determined that they remained in their positions unless and until the party's members adopted the recommendations of the judicial committee and removed them from office. *Id.* at 6.

On February 2, LPM Chair Joe Brungardt described this position in detail in an email sent to all registered LPM members. Ex. 9 at 1–3 (LPM Emails); Ex. 14 at 9 (michiganlp.net Printouts). After explaining that the appropriate role of a committee is to issue recommendations to the broader assembly, Mr. Brungardt stated:

[T]he Judicial Committee has no authority to overrule the delegates of a convention body. Therefore, should the Executive Committee believe that the Judicial Committee is overstepping its authority, it is incumbent upon the Executive Committee to assert the rights of its members in opposition to the Judicial Committee if necessary.

Ex. 9 at 2 (LPM Emails). In order to exercise this responsibility, Mr. Brungardt announced that the party would hold a convention on April 1 so that party members could discuss the judicial committee's recommendations. *Id.* at 1–2.

Meanwhile, Mr. Chadderdon began acting as if the judicial committee's opinion was self-executing. Ex. 5 at 6. Sometime in early 2023, he began conducting so-called "executive committee" meetings of his own with a committee consisting of his political allies. *Id.* As a result of these actions, a contentious governance dispute emerged within the party, dividing its members into two factions. *Id.*

C. The LNC backs Mr. Chadderdon, “constructively disaffiliates” LPM’s elected leaders, and threatens to sue them for trademark infringement.

A few days after Mr. Brungardt sent his email to the LPM membership, the LNC met in executive session to discuss the emerging leadership dispute in Michigan and similar disputes in other state-level affiliates. *See* Ex. 5 at 5 (LNC Minutes – February 2022); *see also* Ex. 12 (*Daily Beast* Article) (describing governance disputes in other states since the Mises Caucus took control of the LNC). Then, on February 16, LNC Chair Angela McArdle sent a letter to Mr. Brungardt informing him that the LNC “recognized” Mr. Chadderdon as the rightful chair of the LPM and that it viewed the executive committee chaired by Mr. Brungardt as “a different political party” that was not a state-level affiliate of the Libertarian Party. ECF No. 12-10, Page I.D. 474–475 (McArdle Letter). Ms. McArdle further stated that, as officers of a separate political party, Mr. Brungardt and the other members of his committee were not entitled to use the Libertarian Party’s trademarks and would be sued for trademark infringement if they continued to do so. *Id.*

Importantly, Ms. McArdle’s letter did not indicate that the LNC voted to disaffiliate the LPM, which requires a $\frac{3}{4}$ vote for good cause under the Libertarian Party bylaws. *See id.*; *see also* ECF No. 12-7, Page I.D. 454 (LP Bylaws). Nor did it explain how the LNC had the authority to take sides in a state-level governance dispute given the language in the bylaws stating that the “autonomy of the affiliate

and sub-affiliate parties shall not be abridged by the National Committee” *Id.* In subsequent correspondence, the LNC has asserted the power to “constructively disaffiliate” individual members and groups of members within state-level affiliates, even though that power is not mentioned in the bylaws. *See* Ex. 10 (Zito Email).

D. LPM’s elected leaders fight back against the LNC with broad support from party members in and out of state.

After receiving Ms. McArdle’s letter, the LPM’s elected leaders continued preparations for the April 1 convention in Lansing as planned. A total of 66 delegates attended the convention, which was 6 more than had attended the last convention before the split in the party occurred. *Compare* Ex. 8 at 1 (April 2023 Draft Convention Minutes), *with* Ex. 15 at 1 (July 2022 Convention Minutes). At the convention, defendant Mike Saliba, who had taken over as acting chair of the elected leadership, *see* Ex. 5 at 1, gave a detailed update on the governance dispute with Mr. Chadderdon, including a dispute over the funds in LPM’s deposit accounts with Comerica Bank.¹ Ex. 8 at 1–2 (April 2023 Draft Convention Minutes). In doing so, Mr. Saliba explained that the LNC recognized Mr. Chadderdon as LPM chair and viewed his chairmanship as illegitimate. *Id.* at 12. Nevertheless, the delegates at the convention expressed their support for Mr. Saliba by electing him by acclamation to continue serving as LPM chair. *Id.* at 10. The delegates also adopted a motion, by a

¹ The funds in the deposit accounts are now subject to an interpleader lawsuit pending in Washtenaw County Circuit Court. *See* Ex. 7 (*Comerica* Complaint).

vote of 58 to 4, indicating that they would affirm the removal of Andrew Chadderdon from the executive committee if it were necessary to do so. *Id.* at 16.

As part of their effort to fight back against Mr. Chadderdon's continued claims to party leadership, LPM's elected leadership setup the michiganlp.net website. This was necessary because Mr. Chadderdon's faction had control of LPM's historic domain name, michiganlp.org. *See* ECF No. 12, Page I.D. 421 (Harlos Declaration). The michiganlp.net website includes several articles explaining the ongoing governance dispute with Mr. Chadderdon and expressly acknowledges that the LNC supports Mr. Chadderdon. Ex. 14 (michiganlp.net Printouts). These acknowledgements were echoed in email communications that Mr. Saliba has sent to the members of LPM over the last few months. *See* Ex. 9 at 7–12 (LPM Emails).

In addition, recognizing the potential for legal action relating to the governance dispute, LPM's elected leadership began fundraising for legal expenses. This effort began by directly soliciting known supporters in early February 2023, and has since grown into a nationwide operation with multiple avenues for donating online. One of those avenues is through the michiganlpm.net website. As described in detail in declarations accompanying this brief, supporters of the elected leadership have driven significant traffic to the payment link on the website through posts on various social media platforms. *See, e.g.*, Ex. 1 at 5 (Thornton Declaration). Many of

those posts expressly reference the elected leadership’s dispute with the LNC, as shown on the next page:



See id. at 5–6; Ex. 2 at 2–3 (Warzybok Declaration); Ex. 3 at 3–4 (Ellison Declaration). Further, the attached spreadsheet of LPM donations shows that donations to the legal defense fund were often received within days after LNC meetings where the LNC took action in support of the Chadderdon faction. *See* Ex. 1 at 6 (Thornton Declaration); Ex. 23 (Donation Spreadsheet). Nevertheless, even though the defendants are confident that their donors understand the antagonistic relationship they have with the LNC, they recently (in an abundance of caution) posted the following disclaimer on the legal defense fund donation page on michiganlp.net:

Notice of Ongoing Governance Dispute

The Libertarian Party of Michigan (LPM) is the state-level affiliate of the Libertarian Party. Since early 2023, there has been a governance dispute in which two separate groups claim to be the legitimately elected members of LPM's executive committee, which functions as the party's leadership at the state level. The two groups are operating independently from each other, conducting their own fundraising, and holding party funds in separate accounts.

The funds donated through this webpage will be placed in the management of the executive committee chaired by Mike Saliba. For a detailed explanation of the origins of the governance dispute and the reasons why Mr. Saliba is LPM's legitimately elected chair, please see [this letter from LPM's legal counsel](#).

Notably, the Libertarian National Committee (LNC), which is the governing arm of the Libertarian Party at the national level, has thrown its support behind Mr. Chadderdon. The LNC is currently suing Mr. Saliba and other executive committee members for trademark infringement. Funds donated to the Legal Defense Fund on this website will be used to defend against the trademark suit and in other pending litigation relating to the governance dispute.

If you would like to donate to the rival board chaired by Mr. Chadderdon, you are on the wrong website. The Chadderdon faction's website can be accessed via [this link](#).

Ex. 14 at 1 (michiganlp.net Printouts). Similarly, Treasurer Thornton and others

setup a new fundraising website, Incfight.org, that describes the LNC’s interference in the LPM governance dispute in even further detail and asks supporters to “defend the rights of libertarians across this country from National overreach.” Ex. 1 at 7 (Thornton Declaration); Ex. 13 at 2–3 (Incfight.org Printouts). Through these various efforts and websites, the defendants have received approximately 100 donations into the legal defense fund, with approximately 70 of those coming from donors who reside out of state. Ex. 23 (Donation Spreadsheet).

LEGAL STANDARD

“[P]reliminary injunctions are extraordinary remedies governed by the following considerations: (1) whether the movant has a strong likelihood of success on the merits, (2) whether the movant would suffer irreparable injury absent a stay, (3) whether granting the stay would cause substantial harm to others, and (4) whether the public interest would be served by granting the stay.” *Ohio Republican Party v. Brunner*, 543 F.3d 357, 361 (6th Cir. 2008) (cleaned up). “The party seeking [a] preliminary injunction bears the burden of justifying such relief.” *McNeilly v. Land*, 684 F.3d 611, 615 (6th Cir. 2012).

ARGUMENT

- A. Injunctive relief is not warranted because the LNC is unlikely to succeed on the merits of its claims.**
 - 1. The noncommercial speech and activities of a political organization are outside the scope of the Lanham Act.**

The Sixth Circuit, like at least four others, has held that the Lanham Act would run afoul of the First Amendment’s free-speech protections if construed to apply beyond the limited context of commercial speech. *Taubman Co. v. Webfeats*, 319 F.3d 770, 774 (6th Cir. 2003); *see also All. for Good Gov’t v. Coal. for Better Gov’t*, 901 F.3d 498, 406 n.8 (5th Cir. 2018) (citing cases). Accordingly, courts in this circuit must keep the First Amendment in mind when construing the various terms that trigger coverage under the Act, such as “use in commerce,” “in connection with,” and “goods and services.” *See Radiance Found., Inc. v. Nat’l Ass’n for Advancement of Colored People*, 786 F.3d 316, 322–24 (4th Cir. 2015) (holding that First Amendment’s commercial speech doctrine provides “the best guidance in applying the Act.”).

In implementing this principle, courts have rejected trademark claims in a variety of situations where the allegedly infringing use constituted noncommercial speech under the First Amendment. For example, in *Savannah College of Art and Design, Incorporated v. Houeix*, 369 F. Supp. 2d 929 (S.D. Ohio 2004), the court rejected a trademark claim involving a website that contained information for foreign students about the American education system, including critiques of the school that the plaintiff operated. In doing so, the court noted that the defendant’s website was a “gripe site” with no paid advertising, and concluded that the First Amendment precluded the imposition of trademark liability for this type of protected noncommercial speech. *Id.* at 947–48. Similarly, another court within the circuit has

held that the Act does not apply to high school coaches who used plaintiff's "Winning Isn't Normal" trademark to teach their student athletes life lessons, even if the coaches also engaged in fundraising activity. *Bell v. Worthington City Sch. Dist.*, No. 2:18-cv-961, at *12-13 (S.D. Ohio June 2, 2020).

While it does not appear that any court in the Sixth Circuit has had the opportunity to consider *Taubman* in the context of a political organization, *Taubman* clearly precludes the use of the Lanham Act to silence political speech. As the Supreme Court has emphasized, political speech, including contributing and soliciting contributions to political campaigns, is among "the most fundamental First Amendment activities." *See Buckley v. Valeo*, 424 U.S. 1, 14 (1976). Accordingly, the Lanham Act cannot be read to extend to activities like disseminating political information, promoting political candidates, or soliciting political donations, because doing so would extend the statute far beyond the context of commercial speech and would subject it to strict — rather than intermediate — scrutiny.

Notably, in a recent case involving similar issues, several judges on the Fifth Circuit suggested that *Taubman* compels this result. First, in a 2018 opinion, a three-judge panel noted that the "interplay between the Lanham Act and the First Amendment's political and commercial speech doctrines raises a thicket of issues." *All. for Good Gov't*, 901 F.3d at 506 n.8 (5th Cir. 2018). The panel specifically noted a circuit split in which the Sixth Circuit and at least four others had held that the Act

applies only to the noncommercial use of marks, while the Second Circuit has held otherwise and applied it to purely political uses. *Id.* Specifically, in *United We Stand Am., Inc. v. United We Stand Am. N.Y., Inc.*, 128 F.3d 86, 88 (2d Cir. 1997), the Second Circuit held that political fundraising and making political endorsements are “services” for purposes of the Lanham Act and can therefore give rise to liability. Ultimately, the 2018 panel determined that it was unnecessary for the Fifth Circuit to weigh in on this circuit split, because the defendants in the case had not properly raised the issue at the district court level. *All. for Good Gov’t*, 901 F.3d at 506 n.8.

Three years later in a subsequent appeal in the same case, Judge Dennis criticized the 2018 opinion for ducking the question, which he believed was necessarily implicated by plaintiff’s theory of liability. *All. for Good Gov’t v. Coal. for Better Gov’t*, 998 F.3d 661, 674 n.4 (5th Cir. 2021) (Dennis, J., dissenting). Judge Dennis then went on to explain why, in his view, applying the Lanham Act to noncommercial political speech was so “clearly erroneous and manifestly unjust” that the latter panel could correct the prior error. *Id.* at 677 n.7. In doing so, he emphasized that the Second Circuit is the “sole outlier court in an otherwise uniform line of federal appellate authority holding that the Lanham Act does not apply to noncommercial speech,” and further asserted that the Second Circuit was “incorrect that purely political speech is a ‘service’ under the Lanham Act.” *Id.* at 677 n.5. He

then further criticized the Second Circuit’s decision for its potential to “stifl[e] the political speech that is key to the functioning of our democracy.”

For its part, the LNC’s theory of liability in this case relies principally on the Second Circuit’s decision in *United We Stand*. See ECF No. 1, Page I.D. 11 (Complaint) (alleging infringement in connection with services such as “political party communications, political party activities, political press activity, political candidate screenings, official filing and registrations and endorsements”). This Court should decline the LNC’s invitation to extend that decision into this circuit, because doing so would be plainly contrary to *Taubman* and would infringe the defendants’ free-speech rights. Moreover, to the extent that the Second Circuit’s decision was based on the policy concern that the absence of Lanham Act protection in this context would be “impractical for the functioning of our political system,” *United We Stand*, 128 F.3d at 90, that concern is misplaced. If Congress believes that legislation is necessary to avoid public confusion in the areas of political speech and political fundraising, it can enact appropriate legislation under the Elections Clause and does not need to stretch its authority under the Commerce Clause. Indeed, Congress has already enacted a statute that prohibits fraudulent misrepresentation in political fundraising, 52 U.S.C. § 30124(b)(1), and the LNC is already pursuing claims under that statute before the FEC. Ex. 11 (FEC Complaint).

2. Even if the Lanham Act applies, the defendants have the contractual right to use the name “Libertarian Party”

because they are members of the LNC’s state-level affiliate, and because the LNC lacks the power of “constructive disaffiliation.”

As acknowledged in its complaint, the LNC was incorporated in the District of Columbia and has its principal offices in Virginia. ECF No. 1, Page I.D. 1 (Complaint). Under the law in both those jurisdictions, “the formal bylaws of an organization are to be construed as a contractual agreement between the organization and its members.” *Meshel v. Ohev Sholom Talmud Torah*, 869 A.2d 343, 361 (D.C. 2005); accord *Gottlieb v. Economy Stores*, 102 S.E.2d 345, 351 (Va. 1958). The defendants in this case are all members of the LPM, which is the state-level affiliate of the LNC. *See* Ex. 4 at 2, 4 (Van Alstine Declaration). As such, they have contractual rights under the Libertarian Party bylaws, several provisions of which are relevant to the dispute in this case.

First, article 5, section 1 of the bylaws provides” “No person, group, or organization may use the name ‘Libertarian Party’ or any confusingly similar designation except the Party or an organization to which the Party grants affiliate party status or as otherwise provided in these bylaws.” ECF No. 12-7, Page I.D. 454 (LP Bylaws). In light of this, the LNC admits that “chartered affiliates are licensed to use the LNC’s federally registered trademarks.” ECF No. 1, Page I.D. 3 (Complaint).

Second, article 5, section 6 of the bylaws prescribes a process for the disaffiliation of affiliate parties, stating in pertinent part:

The National Committee shall have the power to revoke the status of any affiliate party, for cause, by a vote of 3/4 of the entire National Committee. A motion to revoke the status of an affiliate party for cause must specify the nature of the cause for revocation. [ECF No. 12-7, Page I.D. 454 (LP Bylaws)].

Third, article 5, section 5 provides in its entirety: “The autonomy of the affiliate and sub-affiliate parties shall not be abridged by the National Committee or any other committee of the Party, except as provided by these bylaws.” *Id.* Further, no other provision of the bylaws authorizes the LNC to choose between competing factions in a governance dispute within an affiliate party. *See id.* at 453–61.

When read together, the three provisions above debunk the LNC’s claim that it can “constructively disaffiliate” members of state-level parties and thereby prohibit them from using its trademarks. The bylaws prescribe a single procedure for disaffiliation that: (1) applies only to parties as a whole, not to individual members; (2) requires a $\frac{3}{4}$ supermajority vote of the LNC; and (3) can be invoked only for cause. *Id.* at 454. Because this is the only disaffiliation procedure mentioned, ordinary principles of interpretation compel the conclusion that it’s the exclusive procedure. *See Millsaps v. Thompson*, 259 F.3d 535, 546 (6th Cir. 2001) (“When a statute limits a thing to be done in a particular mode, it includes the negative of any other mode.”)

Article 5, section 5’s prohibition on abridging the autonomy of state-level parties further reinforces this reading. Considering that provision, it is implausible that the drafters of the bylaws intended for the LNC to have the sweeping implied

power of “constructive disaffiliation” that it claims. As demonstrated here, the existence of such a power would allow the LNC chair (or at least a bare majority of the LNC) to arbitrarily choose which members of state-level parties are allowed to call themselves members of the “Libertarian Party.” Under any reasonable reading of the bylaws, this would abridge the autonomy of state-level parties to govern themselves and enroll their own members, and it is therefore plainly prohibited.

Accordingly, because Ms. McArdle’s “constructive disaffiliation” letter to Mr. Brungardt exceeded her powers under the bylaws, it was ineffective in revoking the defendants’ contractual license to use the LNC’s marks. *See, e.g., Sheriff v. Medel Elec. Co.*, 412 A.2d 38, 41 (D.C. 1980) (explaining that the termination of a contract is ineffectual if proper procedures are not followed). This case is therefore distinguishable from the two principal cases on which the LNC relies, both of which involved situations where the trademark holder followed the applicable revocation procedures. *See United States Jaycees v. Philadelphia Jaycees*, 639 F.2d 134, 146 (3d Cir. 1981) (“This action . . . does not directly challenge the . . . revocation of the charter.”); *Republican Nat’l Comm. v. Canegata*, 3:22-cv-0037, at *13 (D.V.I. Aug. 10, 2022).

3. The defendants’ use of the name “Libertarian Party” is not confusing because potential donors and dues payers are aware of the governance dispute within the state party and understand that the LNC supports Mr. Chadderdon.

In determining whether a likelihood of confusion exists, this Court considers the following factors: (1) the strength of the plaintiff’s mark, (2) the relatedness of the

goods or services offered by the plaintiff and the defendant, (3) the similarity of the marks, (4) any evidence of actual confusion, (5) the marketing channels used by the parties, (6) the probable degree of purchaser care and sophistication, (7) the defendant's intent in selecting its mark, and (8) the likelihood of either party expanding its product line using the marks. *Innovation Ventures, LLC v. N.V.E., Inc.*, 694 F.3d 723, 731 (6th Cir. 2012). Under this test, the “ultimate question” is “whether relevant consumers are likely to believe that the products or services offered by the parties are affiliated in some way.” *Homeowners Grp., Inc. v. Home Mktg. Specialists, Inc.*, 931 F.2d 1100, 1107 (6th Cir. 1991).

This case is so far outside the intended scope of trademark law that it is difficult to discuss some of these factors intelligibly. To begin, since LPM is a political party that engages in political rather than commercial activity, the task of defining its relevant “consumers” presents an essentially hypothetical question. The defendants contend that the closest thing LPM has to “consumers” are the individuals who make payments to the party either through donations or membership dues. *Cf. Radiance Found.*, 786 F.3d at 327 (4th Cir.) (“trademark infringement is not designed to protect mark holders from consumer confusion about their positions on political or social issues”). As a matter of common sense, these individuals are far more likely than the general public to follow Libertarian Party politics and to be aware of the intraparty disputes that have arisen both in Michigan and in other states since the Mises Caucus

took control of the LNC in 2022. *See, e.g.*, Ex. 5 at 6–7 (Saliba Declaration) (describing evidence that supporters and donors are fully informed); Ex. 1 at 6–8 (Thornton Declaration) (same). They would therefore be likely to exercise a high degree of “care and sophistication” when donating or paying membership dues to the party, so as not to accidentally support factions that they oppose.

A similar conceptual problem exists with respect to the fourth factor — evidence of actual confusion. Because the defendants are LPM members and LPM is currently a recognized affiliate of the Libertarian Party, *see* Ex. 4 at 2, 4 (Van Alstine Declaration), an individual who believes that the defendants’ political services are affiliated with the LNC is not “actually confused,” but is instead correct in that belief. As a result, the most that the plaintiff can possibly show with respect to this factor is confusion as to whether the LNC supports Mr. Saliba or Mr. Chadderdon in the ongoing intraparty governance dispute.² That’s a fundamentally different question than what trademark law typically asks. *See Homeowners Grp.*, 931 F.2d at 1107 (defining the “ultimate question” in trademark cases). Accordingly, even if the LNC can show confusion regarding its position in the governance dispute, that does not amount to confusion regarding the affiliation between the LNC and the political

² The videoclip referenced in the LNC’s brief arguably constitutes evidence of such confusion on the part of 1 of the 66 delegates at the April 2023 convention. *See* ECF No. 12, Page I.D. 399 (Plaintiff’s Brief). The videoclip, as quoted in the brief, also shows that Mr. Saliba immediately dissipated any confusion by responding that “Andrew (Chadderdon) is the chair of the board that they recognized.” *Id.*

services performed by LPM members. Moreover, the evidence shows that many of the donations to the LPM legal defense fund were made shortly after LNC meetings at which the LNC discussed and took various actions in support of Mr. Chadderdon’s claim to be the rightful chair of the LPM. Ex. 1 at 6 (Thornton Declaration); Ex. 23 (Donation Spreadsheet). The timing of these donations, along with the content of the social media posts that appears to have driven them, strongly suggests that many individuals who donated to the defendants did so at least in part because they believe the LNC’s interference with a state-level affiliate is inappropriate and contrary to the Libertarian Party bylaws — not because of any confusion about the relationship between the LNC and the defendants. *see, e.g.*, Ex. 2 at 2–3 (Warzybok Declaration); Ex. 3 at 3–4 (Ellison Declaration). For these reasons, the fourth factor weighs in favor of the defendants to the extent it applies.

The remaining factors are more directly applicable to this case, and at least three of them strongly weigh in favor of the defendants. First, the mark “Libertarian Party” is quite weak, despite its incontestable status. *See Progressive Distribution Servs., Inc. v. United Parcel Serv., Inc.*, 856 F.3d 416, 428–30 (6th Cir. 2017) (explaining that incontestable status gives rise to a rebuttable presumption of strength). In terms of conceptual strength, the mark is merely descriptive at most, and arguably even generic. For purposes of trademark law, a merely descriptive mark is one that describes the qualities or characteristics of a good or service. *Nartron Corp. v.*

Stmicroelectronics, Inc., 305 F.3d 397, 404 n.7 (6th Cir. 2002). The phrase “libertarian party” certainly doesn’t do any more than this, since the word “libertarian” is a common term for describing a political ideology that seeks to maximize individual rights and minimize the role of the state. *See* THE AMERICAN HERITAGE DICTIONARY OF THE ENGLISH LANGUAGE (5th ed.). As a result, an ordinary English speaker would understand the phrase “libertarian party” to mean a political party that advocates policies aligning with this ideology, and would only associate it with a particular political party to the extent the speaker was aware its secondary meaning.

Second, the marketing channels that the defendants and their supporters use are unlikely to cause confusion, because the defendants have been honest and transparent about their relationship with the LNC throughout the governance dispute. As described above, Mr. Saliba has sent multiple emails to the full membership of the LPM describing the governance dispute and acknowledging that the LNC supports Mr. Chadderdon’s claim to power. Ex 9 (LPM emails). Similar acknowledgments appear in articles in the “News” page of the michiganlp.net website, Ex. 14 at 5–9 (michiganlp.net Printouts), and many of the social media posts that have driven donations to the defendants’ legal defense fund expressly reference the LNC or this trademark suit, *see, e.g.*, Ex. 1 (Thornton Declaration). Finally, and perhaps most notably, the defendants recently added a disclaimer to the “Donation” pages on michiganlp.net that describes the governance dispute in detail, provides a

link to the Chadderdon faction’s website, and states that “the Libertarian National Committee (LNC) . . . has thrown its support behind Mr. Chadderdon.” Ex. 14 at 1–2 (michiganlp.net Printouts). This Court has held that the use of such disclaimers can be effective in presenting consumer confusion. *See Taubman*, 319 F.3d at 776–77.

Third, the seventh factor weighs in favor of the defendants because the defendants do not use the name “Libertarian Party” with the intent to misappropriate the LNC’s mark. Rather, the defendants are longtime members of the Libertarian Party of Michigan and have a good faith claim to being its elected leaders. The evidence shows that a substantial number of LPM members support that claim, which strongly counsels against any finding of malintent. *See e.g.*, Ex 8 at 1 (April 2023 Draft Convention Minutes) (noting 66 delegates in attendance).

B. Even if the LNC were likely to prevail on the merits, the equities weigh against the broad preliminary injunction it seeks.

Setting aside the LNC’s likelihood of prevailing on the merits, this Court considers three other factors in determining whether to grant the extraordinary remedy of a preliminary injunction. All three factors counsel against doing so.

First, because the LNC has not sufficiently demonstrated that individuals who might be inclined to donate or pay membership dues to the party are likely to be confused by the defendant’s use of the name “Libertarian Party,” they have not established that they would suffer an irreparable injury absent a preliminary injunction. Because potential donors and party members are generally aware of the

intraparty dispute, they are unlikely to mistakenly provide financial support to rival factions within the party. Indeed, Ms. Thornton, LPM's elected treasurer, has indicated that no one who provided financial support to the defendants since the governance dispute began has requested a refund or otherwise informed her that they were confused about the relationship between the defendants and the LNC. Ex. 1 at 7 (Thornton Declaration). Moreover, to the extent the defendants are violating state law or federal campaign-finance law through their fundraising efforts (as the LNC erroneously contends), any such violation could be addressed in the *Comerica Bank* case or in the pending matter before the FEC.

Second, if this Court were to grant a preliminary injunction barring the defendants from using the name "Libertarian Party," it could cripple them in the ongoing governance dispute and the related legal matters referenced above. One of the more significant assets the defendants have in these matters is the broad support they enjoy from the party's membership. If the defendants are precluded from even referring to the name of the party, however, they could lose credibility in the eyes of the membership and their support could dwindle. Moreover, the inability to refer to themselves as the "Libertarian Party" could hamstring the defendants' fundraising efforts, including efforts to raise funds to continue defending this lawsuit.

Third, granting a preliminary injunction would be contrary to the public interest in at least two distinct ways. For one, in light of the constitutional values

embodied in the First Amendment, it is well established that the “public interest is supported by protecting the right to speak, both individually and collectively.” *Carey v. Fed. Election Comm’n*, 791 F. Supp. 2d 121, 136 (D.D.C. 2011). Accordingly, if this Court has any doubt that the defendants’ use of the name “Libertarian Party” in connection with their political activities may be outside the scope of the Lanham Act, it should err on the side of protecting the defendants’ free-speech rights while this suit is pending. In addition, the Sixth Circuit has recognized that courts “have historically been reluctant to intervene in intra-party disputes.” *Heitmanis v. Austin*, 899 F.2d 521, 525 (6th Cir. 1990). Granting the LNC’s requested injunction would, in effect, allow one faction within the LPM to continue calling itself the “Libertarian Party of Michigan” while prohibiting the other faction from doing so. This Court should refrain from that type of intervention unless and until the LNC conclusively establishes its entitlement to relief in this case, which it has not done thus far.

CONCLUSION

For these reasons, the Defendants respectfully request that this Court deny the LNC’s motion for a preliminary injunction.

DATED: July 10, 2023

Respectfully submitted,

By: /s/ C. Nicholas Curcio
CURCIO LAW FIRM, PLC
16905 Birchview Drive
Nunica, MI 49448
Telephone: (616) 430-2201
ncurcio@curciofirm.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**LIBERTARIAN NATIONAL
COMMITTEE, INC.,**

Plaintiff,

v.

**MIKE SALIBA, RAFAEL WOLF,
GREG STEMPELE, ANGELA
THORNTON-CANNY, JAMI
VAN ALSTINE, MARY
BUZUMA, DAVID CANNY,
and JOSEPH BRUNGARDT,**

Defendants.

Case No. 23-cv-11074

Hon. Judith E. Levy

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2023, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to counsel of record.

DATED: July 10, 2023

Respectfully submitted,

By: /s/ C. Nicholas Curcio

C. Nicholas Curcio

CURCIO LAW FIRM, PLC

16905 Birchview Drive

Nunica, MI 49448

Telephone: (616) 430-2201

ncurcio@curciofirm.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**LIBERTARIAN NATIONAL
COMMITTEE, INC.,**

Plaintiff,

v.

**MIKE SALIBA, RAFAEL WOLF,
GREG STEMPFLE, ANGELA
THORNTON-CANNY, JAMI
VAN ALSTINE, MARY
BUZUMA, DAVID CANNY,
and JOSEPH BRUNGARDT,**

Defendants.

Case No. 23-cv-11074

Hon. Judith E. Levy

DECLARATION OF ANGELA THORNTON

Under 28 U.S.C. § 1746, I, Angela Thornton, declare as follows under penalty of perjury:

1. I am over the age of 18, of sound mind, and otherwise competent to provide this declaration.
2. My legal surname is Thornton, not Thornton-Canny (as stated in the complaint and other filings in this action).
3. I am a member of the Libertarian Party of Michigan (LPM).

4. I am also a former member of the Mises Caucus of Michigan. I resigned my membership in that caucus in early 2023 because of my disagreement with Andrew Chadderdon's claim to be the rightful chair of the LPM.

5. I currently serve on the LPM executive committee as its treasurer. I became acting treasurer of LPM in early February 2023 after the resignation of the former treasurer, Norm Peterson. I was then elected to continue serving in the position of treasurer at LPM's April 2023 convention in Lansing. I also serve as the treasurer for the Libertarian Party of Genesee County, which is a local affiliate of the LPM.

6. In my role as LPM treasurer, it is my responsibility to receive, expend, and account for the funds of the party under the supervision and direction of the LPM executive committee.

7. To assist me in doing so, I prepare and maintain a spreadsheet of all funds received by the LPM. A true and accurate copy of that spreadsheet, showing all donations received from the date I became acting treasurer through June 30, 2023, is included as Exhibit 23 to the *Defendants' Brief in Support of Response to Motion for Preliminary Injunction* (the "Response Brief") in the above-captioned case.

8. LPM has historically deposited its funds in various deposit accounts held with Comerica Bank. However, when I became acting treasurer, there was concern among the members of LPM's executive committee that the funds held in that

account could become the subject of a legal dispute, due to the emerging intra-party governance dispute with Andrew Chadderdon.

9. Accordingly, a decision was made to deposit funds received after the emergence of the governance dispute in a segregated account held in the name of the Libertarian Party of Genesee County. It was further decided to leave the moneys that were received prior to the emergence of the governance dispute in the Comerica Bank account. This arrangement was intended as a temporary measure that would enable the LPM to easily provide accountings for the moneys received before and after the governance dispute began.

10. The seven donations received between February 9 and February 18, with the source designated as “Paypal/Email Response,” were made through a PayPal link sent to select members of the party asking for donations to assist LPM’s elected leadership (*i.e.*, the individuals who were elected to the executive committee at the July 2022 convention, who have now been succeeded by the individuals elected at the April 2022 convention, as listed at <https://michiganlp.net/about-us/leadership/>) with legal expenses relating to the emerging governance dispute with Andrew Chadderdon. The funds raised for this purpose eventually came to be referred to as the “LPM Legal Defense Fund.”

11. When these funds were received, they were deposited into an account held in the name of the Libertarian Party of Genesee County. They were

subsequently paid, on behalf of LPM, into a client trust account with Curcio Law Firm, PLC, which is representing LPM in this case as well as in ongoing litigation regarding the Comerica Bank account and in ongoing administrative proceedings in the Federal Election Commission (both of which relate to the intra-party governance dispute). The same procedure has been used for all moneys that have since been paid into the LPM Legal Defense Fund.

12. The payments on the spreadsheet with a source marked “LawPay/Direct to Attorney Curcio” were made by check or credit card by supporters of the elected leadership directly to the Curcio Law Firm, PLC. Supporters were made aware of this payment option by email or other personal communications.

13. The payments on the spreadsheet with a source marked “Paypal/Convention Regis” “Credit Card / Convention On Site,” and “Check / Convention Fundraiser” were made by LPM members to pay the registration fee or participate in fundraising activities in connection with the LPM convention held on April 1, 2023, in Lansing.

14. The payment on the spreadsheet with a source marked “Paypal / Membership Link” was made on the “Membership” page of the michiganlp.net website.

15. All of the payments described in paragraphs 13 and 14 above were made after former LPM chair Joe Brungardt sent an email on February 2, 2022, to all registered LPM members explaining the governance dispute with Andrew Chadderdon, and after the LNC sent a response letter to Mr. Brungardt on February 16 stating that it supported Mr. Chadderdon's claim to be the rightful chair of LPM.

16. The payments on the spreadsheet with a source marked "Anedot/Legal Fund Page" were made using a payment system serviced by anedot.com, which could be done either through the "Donate to LPM Legal Defense Fund" page on the michiganlp.net website or through direct links to andot.com that were widely shared on social media. As described in the declaration of LPM Secretary Jami Van Alstine (Response Brief Exhibit 4), the "Notice of Ongoing Governance Dispute" text box was added to the "Donate to LPM Legal Defense Fund" page on June 30, 2023.

17. Based on the timing of the donations made to the LPM Legal Defense Fund, I believe that they were driven in large part by social media posts made by Brian Ellison and Brandon Warzybok, a sampling of which are provided in the declarations provided to the Court as Response Brief Exhibits 2 and 3. These posts specifically referenced the ongoing dispute between the LNC and the LPM's elected leadership.

18. As shown on the spreadsheet, many of the donations were made shortly after LNC meetings at which the LNC discussed and took various actions in support of Mr. Chadderdon's claim to be the rightful chair of the LPM (*i.e.*, the LNC meetings held on February 5, March 8, and April 8).

19. Further, many of the donations came from individuals who live outside the state of Michigan. In my experience in LPM fundraising, it is unusual for the party to receive out-of-state donations.

20. In addition to the social media posts made by Mr. Ellison and Mr. Warzybok, I am aware of posts made by individuals who reside outside of Michigan that encourage donation to the Legal Defense Fund, such as the Facebook post below from an individual whose Facebook profile indicates he lives in Pennsylvania:



21. In early May, I assisted in setting up the Incfight.org website as an additional means of raising money for the LPM Legal Defense Fund. True and accurate printouts of pages from this website are attached as Response Brief Exhibit 14.

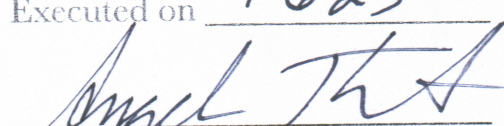
22. The payments on the spreadsheet with a source marked “CC / Webpage LNCFIGHT.ORG” were made via the Incfight.org website.

23. Since I became acting treasurer in early February 2023, no one has donated to LPM through the “Donate” tab on the michiganlp.net website. Donations made via that link would be deposited in LPM’s general fund, which is used for general party expenditures like literature, signage, insurance, etc. All moneys received during my time as treasurer have been for membership renewals, donations to the LPM Legal Defense Fund, or payments made in connection with the April 2023 convention.

24. No one who made payments to LPM since the time I became acting treasurer has informed me that they did so while under the mistaken impression that LPM’s elected leadership was supported by the LNC. Nor has anyone requested a refund of moneys paid. Further, most of the individuals who donated and who reside within the state of Michigan are known to me as active supports of the elected leadership.

25. As a former member of the Mises Caucus of Michigan, I had access to Mises Caucus communications on the chat/communication website discord.com. Response Brief Exhibit 19 consists of true and accurate copies of pages the Libertarian Party Mises Caucus's *Strategic Action Plan* for the 2022 Libertarian Party national convention in Reno, Nevada, which was posted on discord.com by other members of the Mises Caucus. Those pages show the individuals who were endorsed by the Mises Caucus for positions on the LNC. Most of those individuals now serve on the LNC, as indicated on the LNC's website: <https://www.lp.org/libertarian-national-committee/>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 7-6-23

Angela Thornton

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**LIBERTARIAN NATIONAL
COMMITTEE, INC.,**

Plaintiff,

v.

**MIKE SALIBA, RAFAEL WOLF,
GREG STEMPEL, ANGELA
THORNTON-CANNY, JAMI
VAN ALSTINE, MARY
BUZUMA, DAVID CANNY,
and JOSEPH BRUNGARDT,**

Defendants.

Case No. 23-cv-11074

Hon. Judith E. Levy

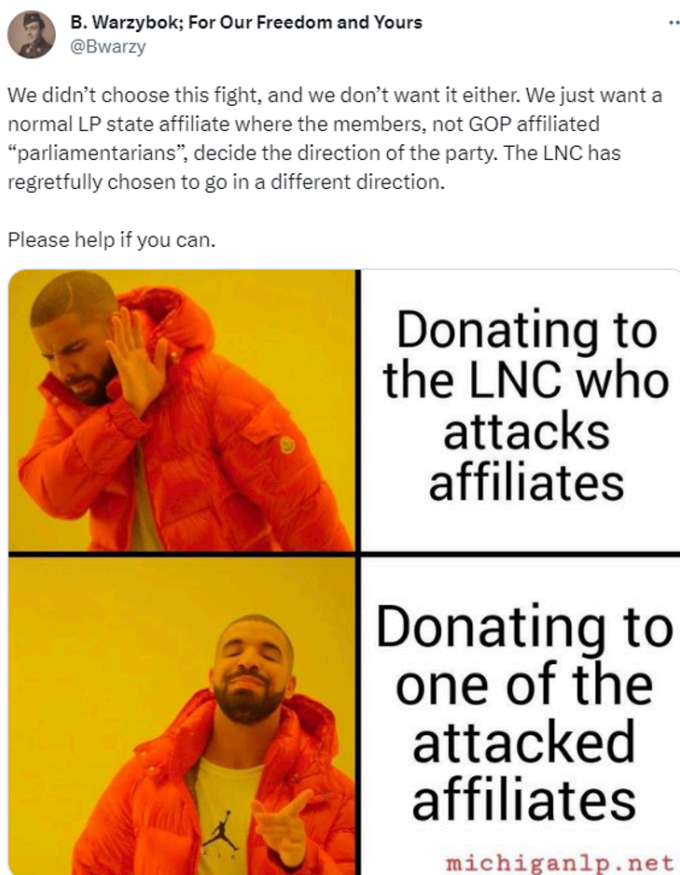
DECLARATION OF BRANDON WARZYBOK

Under 28 U.S.C. § 1746, I, Brandon Warzybok, declare as follows under penalty of perjury:

1. I am over the age of 18, of sound mind, and otherwise competent to provide this declaration.
2. I am a member of the Libertarian Party of Michigan (LPM).
3. I believe that Mike Saliba and the other individuals listed at the following website, <https://michiganlp.net/about-us/leadership/> (collectively, the “elected leadership”), are the legitimate and rightfully elected leaders of the LPM.


4. I have supported the elected leadership in the governance dispute with Andrew Chadderdon by encouraging my followers on social media to donate to the LPM legal defense fund, which was created to raise money for legal expenses relating to the governance dispute.

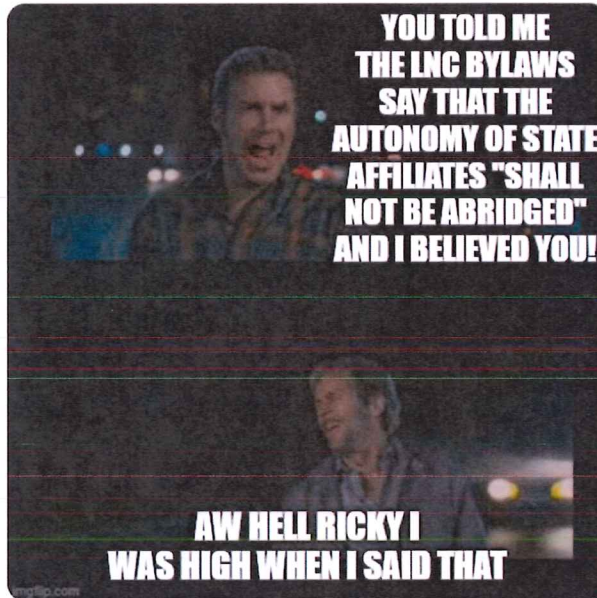
5. On April 9, the day after the LNC voted to sue the elected leadership for trademark infringement, I made the following post on Twitter:



6. By including the "michiganlp.net" reference at the bottom of the post, my intent was to encourage donations through "Donations" tab on that website, which had electronic payment links that were hosted at that time by anedot.com.

7. The next day, I made the following post on Twitter for the same purpose:

 **B. Warzybok; For Our Freedom and Yours** @Bwarzy · Apr 10 ...
The LNC has decided to sue the member-elected Libertarian Party of Michigan. I could explain all of the reasons why this is idiocy, or I could just tell you that we're not going to take it laying down, and that we're asking you to chip in a few bucks to support our legal defense.

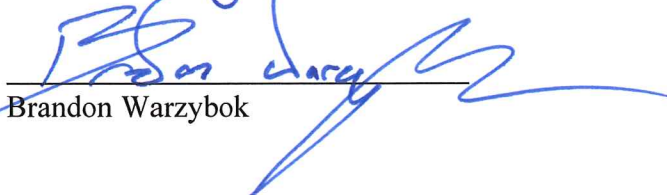


8. In posting these items, it was my intent that anyone who read them would understand that they were being asked to donate to a cause (*i.e.*, support for the LPM's elected leadership) that was not supported by – and was in fact antagonistic to – the LNC.

9. I am not aware of anyone who was confused by my posts.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 30, 2023


Brandon Warzybok

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**LIBERTARIAN NATIONAL
COMMITTEE, INC.,**

Plaintiff,

v.

**MIKE SALIBA, RAFAEL WOLF,
GREG STEMPFLE, ANGELA
THORNTON-CANNY, JAMI
VAN ALSTINE, MARY
BUZUMA, DAVID CANNY,
and JOSEPH BRUNGARDT,**

Defendants.

Case No. 23-cv-11074

Hon. Judith E. Levy

DECLARATION OF BRIAN ELLISON

Under 28 U.S.C. § 1746, I, Brian Ellison, declare as follows under penalty of perjury:

1. I am over the age of 18, of sound mind, and otherwise competent to provide this declaration.

2. I am a member of the Libertarian Party of Michigan (LPM) and ran as LPM's candidate for lieutenant governor during the 2022 gubernatorial election.

3. I currently serve on the LPM executive committee as the representative from District 5, which covers counties on and near Michigan's southwestern border.

I was elected to that position at LPM's April 2023 convention in Lansing.

4. I believe that Mike Saliba and the other individuals listed at the following website, <https://michiganlp.net/about-us/leadership/> (collectively, the “elected leadership”), are the legitimate and rightfully elected leaders of the LPM.

5. I have supported the elected leadership in the governance dispute with Andrew Chadderdon in a number of ways, including by: (1) donating to LPM’s legal defense fund; and (2) encouraging others to do so in posts on social media. The LPM legal defense fund was created to raise money for legal expenses relating to the governance dispute.

6. On February 10, 2023, I donated \$250 to LPM’s legal defense fund through a PayPal.com link sent to me by email by a member of the elected leadership.

7. At the time, I was aware that the LNC executive committee had met in executive commission five days earlier to discuss the LPM governance dispute, and was aware that it was likely to side with Andrew Chadderdon due to his affiliation with the Mises Caucus.

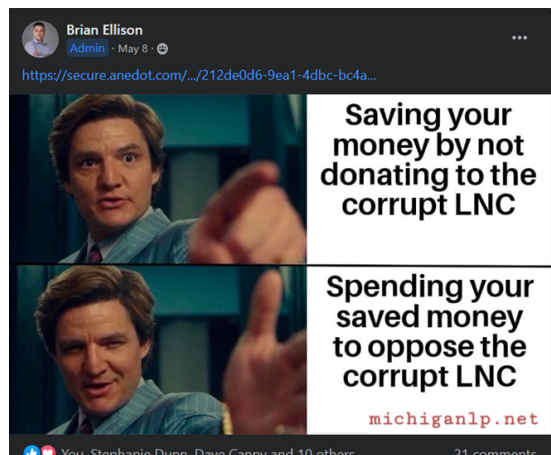
8. I decided to donate to the LPM legal defense fund in part because I wished to assist the elected leadership in contesting any interference from the LNC in an intraparty governance dispute within a state-level affiliate. I believe that LNC interference with the affairs of state-level affiliates is contrary to article 5, section 5 of the bylaws of the Libertarian Party, which states: “The autonomy of the affiliate and

sub-affiliate parties shall not be abridged by the National Committee or any other committee of the Party, except as provided by these bylaws.”

9. In addition to my personal donation, I have made several posts on Facebook asking others to donate to the LPM legal defense fund, a sampling of which are shown below.

10. In part because of my 2022 candidacy for lieutenant governor, I have a significant following on social media that includes members of the Libertarian Party and its state-level affiliates both inside and outside of the state of Michigan.

11. On May 8, three days after the LNC filed the complaint in this case, I posted the following on social media. The link at the top of the post is a link to the LPM legal defense fund’s payment page hosted through anedot.com. Visitors to that page can make electronic donations to the LPM legal defense fund.



12. On that same day, I made the following posts on Twitter. These posts also contained a link the LPM legal defense fund payment page on anedot.com.



13. The second of these posts references a post made by Angela McArdle in June 2021, a year before she became chair of the LNC.

14. In posting these items, it was my intent that anyone who read them would understand that they were being asked to donate to cause (*i.e.*, support for the LPM's elected leadership) that was not supported by — and was in fact antagonistic to — the LNC.

15. I am not aware of anyone who was confused by my posts.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 6-30-23



Brian Ellison

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**LIBERTARIAN NATIONAL
COMMITTEE, INC.,**

Plaintiff,

v.

**MIKE SALIBA, RAFAEL WOLF,
GREG STEMPFLE, ANGELA
THORNTON-CANNY, JAMI
VAN ALSTINE, MARY
BUZUMA, DAVID CANNY,
and JOSEPH BRUNGARDT,**

Defendants.

Case No. 23-cv-11074

Hon. Judith E. Levy

DECLARATION OF JAMI VAN ALSTINE

Under 28 U.S.C. § 1746, I, Jami Van Alstine, declare as follows under penalty of perjury:

1. I am over the age of 18, of sound mind, and otherwise competent to provide this declaration.
2. I am a member of the Libertarian Party of Michigan (LPM).
3. I currently serve on the LPM executive committee as its secretary. I was elected to that position at LPM's April 2023 convention in Lansing.
4. In my role as secretary, I am responsible for maintaining LPM's official documents, including minutes of LPM conventions and executive committee

meetings, as well as LPM's bylaws and other governing documents, and am also responsible for maintaining LPM's website (michiganlp.net) and various social media pages.

5. As LPM secretary, I certify that all eight defendants named in the above-captioned case are members of the LPM. I am not aware of any action taken by the LNC nor by the unauthorized board chaired by Mr. Andrew Chadderdon to revoke their LPM membership status, nor do I believe that either of those entities has the authority to revoke LPM membership status.

6. I have also reviewed the exhibits attached to *Defendants' Response to Motion for Preliminary Injunction* in the above-captioned case (the "Exhibits")

7. Exhibit 6 is a true and accurate copy of the Bylaws of the Libertarian Party of Michigan (June 26, 2021 ed.), which were in effect during the LPM convention held in July 2022 in Holland, Michigan. These bylaws are separate and distinct from the bylaws of the Libertarian Party of Michigan Executive Committee, Inc.

8. Exhibit 7 is a true and accurate copy of the second-amended complaint filed in *Comerica Bank v Libertarian Party of Michigan, et al.*

9. Exhibit 8 is a true and accurate copy of the draft minutes of the April 2023 LPM convention in Lansing. Those minutes will be presented to the LPM membership for approval at the party's 2024 convention.

10. Exhibit 9 is comprised of true and accurate copies of emails sent to all registered members of the LPM by LPM Chair Brungardt or LPM Chair Saliba on the dates indicated in the top-left corner of each email.

11. Exhibit 11 is a true and accurate copy of FEC complaint filed by LNC Chair McArdle as MUR 8130, minus the exhibits that were attached thereto.

12. Exhibit 12 is a true and accurate copy of the following article, Kelly Weill, Libertarian Party is Fighting a Civil War Over its Right-Wing Mises Caucus, *The Daily Beast*, September 29, 2022, as it existed on <<https://www.thedailybeast.com/libertarian-party-is-fighting-a-civil-war-over-its-right-wing-mises-caucus>> as of the date this declaration it was signed.

13. Exhibit 13 is comprised of a true and accurate copies of printouts from Incfight.org that reflect the content on that website as of the date this declaration was signed.

14. Exhibit 14 is comprised of a true and accurate copies of printouts from michiganlp.net that reflect the content on that website as of the date this declaration was signed.

15. Exhibit 15 is a true and accurate copy of the official minutes of the July 2022 LPM convention in Holland, Michigan.

16. Exhibit 16 is a true and accurate copy of the official minutes of the LNC executive committee meeting on February 5, 2023, as posted on the LNC's official website at <https://www.lp.org/lnc-meeting-archives/>.

17. Exhibit 17 is a true and accurate copy of the official minutes of the LNC executive committee meeting on March 8, 2023, as posted on the LNC's official website at <https://www.lp.org/lnc-meeting-archives/>.

18. Exhibit 18 is a true and accurate copy of the official minutes of the LNC executive committee meeting on April 8, 2023, as posted on the LNC's official website at <https://www.lp.org/lnc-meeting-archives/>.

19. I have reviewed the LNC meeting minutes provided in Exhibits 14, 15, and 16, as well as the other minutes posted on the LNC's official website at <https://www.lp.org/lnc-meeting-archives/>, and have confirmed that the LNC has not taken any vote to revoke LPM's disaffiliate status, which requires a $\frac{3}{4}$ supermajority vote for cause under the bylaws of the Libertarian Party. Further, the LNC has not taken any vote to disaffiliate any individual members of, or groups within, the LPM, nor does it have any power to do so under the bylaws.

20. Exhibit 22 is a true and accurate copy of a printout from the *Independent Political Report* website showing a sampling of articles published by one of its writers between April 15 and May 8, 2023. The printout reflects the content on the website as of the date this declaration was signed.

21. In my role of maintaining the LPM's social media accounts, I have made numerous posts referencing the ongoing dispute between the LPM elected leadership (*i.e.*, the individuals listed at <https://michiganlp.net/about-us/leadership/>) regarding the LNC's recognition of Andrew Chadderdon as the LPM chair, including the following:





Michigan Libertarians (Official LPM) @MILibertarians

...

The LPM has a goal to raise an additional \$5000 in the next 3 weeks in order to ensure that there are adequate resources to pursue a dispositive motion, which, if successful, would bring the LNC's lawsuit against the LPM to a just resolution.

Donate: tinyurl.com/donatelpmldf

Notice.

Traditionally the Libertarian Party has operated on a devolved basis, with a maximum degree of independence afforded to each state able to conduct its own business and make its own decisions. This policy is a reflection of Libertarian values, which emphasize the value of freedom and placing as much power as possible at the local level. This policy preference is enshrined in the Libertarian National Committee Bylaws, which provide that "The autonomy of the affiliate and its affairs shall not be usurped by the National Committee or any other committee of the Party."

In recent months, there has been a leadership dispute among Libertarians in the State of Michigan. There are no factions or members who are taking up themselves to be the affiliate party. The members of the Libertarian Party of Michigan are seeking the dispute out on their own, and in the Michigan Courts. It has long been the policy of the Libertarian National Committee to refrain from directly involving themselves in state affiliate leadership disputes, such as the one which is unfolding in Michigan, preferring to allow the free choice of the state affiliates to resolve their disputes for themselves.

Unfortunately, the current Libertarian National Committee has chosen a very different, very un-Libertarian path. The National Committee has not only usurped its own role as the official national committee of the state of Michigan, including the conduct and terms of the next general gubernatorial candidate, the actual elected candidate for Secretary of State, and multiple members of the current board of one of the divisions. These actions are a direct violation of the autonomy of the Michigan National Committee, which is the legal and correct Libertarian Party. It is alleged that these individuals may be stopped from calling themselves the Libertarian Party of Michigan for all other reasons than because the National Committee favors the other side of the party dispute, by purely political reasons.

The claims against these Michigan activists are not meritorious. The leadership claim by the Libertarian National Committee is unprecedented. Indeed, the Democratic Party made an absolute attempt to trademark their name many years ago, and the Republicans, in their part, have never tried, despite the ability of such a claim. There is a very good reason for this: a trademark holder who fails to take steps to enforce their trademark essentially loses that right through non-enforcement. Knowledgeably allowing a third party to infringe trademark rights without taking action not only creates confusion in the marketplace, but also confidence, abandonment, and others, both of which reduce the strength and validity of the trademark itself. The Libertarian Party, and its logos which are the basis of the Michigan National Committee, have been widely disseminated and used by activists for many years now, including by politicians, public professional groups, and private groups with the public and private sectors. In short, the need is obvious to enforce this trademark against one disaffected group of Libertarians who is unlikely to be silenced forcibly by the state's pro-judge, and on the balance, the most likely outcome is a ruling that the Libertarian National Committee will be told that their trademark is unenforceable. Indeed, this appears to have been the advice that the Libertarian National Committee has been given by their attorneys in the past.

The Libertarian National Committee is able to use their intellectual property to report themselves the party state party leadership dispute, the national committee and local party affiliates are a jurisdictional free zone and therefore become a public myth. The National Committee is allowed to trademark using the Courts to harass activists. The Party will continue to be consumed by internal divisions and state, indeed activists will become demoralized, unwilling to dispute their time to imposture party, were it these things may merely be a financial cost, uninvolved in their money being used to sue other libertarians, and the new divisions and groups to donate their hard-earned money to. And quality candidates, many of the state's best, are being threatened, and those not to run for office. This lawsuit is a threat to evagating that David Nolan and generators of the libertarian ideal have chosen to brand.

The eight Michigan activists who are entering themselves in the lawsuit require continued financial support to mount a legal defense. The eight are working in decent to one another, and helping a strong legal defense team will be necessary to ensure that this case reaches the desired resolution. Unlike the Libertarian National Committee, they control their money from donors, and are responsible for the disbursement of Libertarian support in the spirit of reciprocity, with the recognition of the importance of this case and what is at stake for the future of the party, preservation of a tradition of the law, and encouragement to others to take the movement to its conclusion.

4:03 PM · Jun 20, 2023 · 1,757 Views

22. Aside from the allegations made in the court filings in this lawsuit, I have not received any complaints that michiganlp.net or LPM's social media accounts misleadingly suggest that the LNC supports the elected leadership in the ongoing governance dispute with Mr. Chadderdon.

23. Nevertheless, in an abundance of caution to ensure that no one is misled into mistakenly donating to the elected leadership, the following disclaimer was added to the donation pages on michiganlp.net on June 30, 2023:

Notice of Ongoing Governance Dispute

The Libertarian Party of Michigan (LPM) is the state-level affiliate of the Libertarian Party. Since early 2023, there has been a governance dispute in which two separate groups claim to be the legitimately elected members of LPM's executive committee, which functions as the party's leadership at the state level. The two groups are operating independently from each other, conducting their own fundraising, and holding party funds in separate accounts.

The funds donated through this webpage will be placed in the management of the executive committee chaired by Mike Saliba. For a detailed explanation of the origins of the governance dispute and the reasons why Mr. Saliba is LPM's legitimately elected chair, please see [this letter from LPM's legal counsel](#).

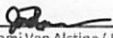
Notably, the Libertarian National Committee (LNC), which is the governing arm of the Libertarian Party at the national level, has thrown its support behind Mr. Chadderdon. The LNC is currently suing Mr. Saliba and other executive committee members for trademark infringement. Funds donated to the Legal Defense Fund on this website will be used to defend against the trademark suit and in other pending litigation relating to the governance dispute.

If you would like to donate to the rival board chaired by Mr. Chadderdon, you are on the wrong website. The Chadderdon faction's website can be accessed via [this link](#).

I declare under penalty of perjury that the foregoing is true and correct.

Jul 7, 2023

Executed on _____



Jami Van Alstine (Jul 7, 2023 06:13 GMT+2)

Jami Van Alstine







Van Alstine Affidavit (revised)[69]

Final Audit Report

2023-07-07

Created:	2023-07-06
By:	Charles Curcio (ncurcio@curciofirm.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA-LShD3KFLczY3h-4_zav1KBqqY4hDIMg

"Van Alstine Affidavit (revised)[69]" History

-  Document created by Charles Curcio (ncurcio@curciofirm.com)
2023-07-06 - 5:51:10 PM GMT- IP address: 97.91.5.46
-  Document emailed to jamiracquel2004@yahoo.com for signature
2023-07-06 - 5:52:52 PM GMT
-  Email viewed by jamiracquel2004@yahoo.com
2023-07-07 - 4:08:00 AM GMT- IP address: 87.248.116.147
-  Signer jamiracquel2004@yahoo.com entered name at signing as Jami Van Alstine
2023-07-07 - 4:13:09 AM GMT- IP address: 192.145.10.234
-  Document e-signed by Jami Van Alstine (jamiracquel2004@yahoo.com)
Signature Date: 2023-07-07 - 4:13:11 AM GMT - Time Source: server- IP address: 192.145.10.234
-  Agreement completed.
2023-07-07 - 4:13:11 AM GMT

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**LIBERTARIAN NATIONAL
COMMITTEE, INC.,**

Plaintiff,

v.

**MIKE SALIBA, RAFAEL WOLF,
GREG STEMPELE, ANGELA
THORNTON-CANNY, JAMI
VAN ALSTINE, MARY
BUZUMA, DAVID CANNY,
and JOSEPH BRUNGARDT,**

Defendants.

Case No. 23-cv-11074

Hon. Judith E. Levy

DECLARATION OF MICHAEL SALIBA

Under 28 U.S.C. § 1746, I, Michael (Mike) Saliba, declare as follows under penalty of perjury:

1. I am over the age of 18, of sound mind, and otherwise competent to provide this declaration.
2. I am a member of the Libertarian Party of Michigan (LPM) and of the Libertarian Party. I have a lifetime membership in the latter entity.
3. I currently serve on the LPM executive committee as its chair, which is the highest leadership position in the LPM. I became acting chair of the LPM in February 2023 after the resignation of the former acting chair, Joe Brungardt. I was

then elected to continue serving in the position of chair at LPM's April 2023 convention in Lansing.

4. I was a member of the LPM executive committee throughout the summer of 2022 and am personally aware of the events that lead to Mr. Andrew Chadderdon's ascension to, and ultimate removal from, the position of LPM acting chair.

5. In the early summer of 2022, the two highest ranking officers of the LPM resigned from their leadership positions just weeks before the party's candidate nominating convention in Holland, Michigan.

6. In a letter explaining his decision, former-Chair Tim Yow cited hostility from Mr. Chadderdon, who was the second vice chair of LPM at that time. Mr. Yow also cited concern with the ideology of the political caucus to which Mr. Chadderdon belongs, which is known as the Libertarian Party Mises Caucus. A true and accurate copy of Mr. Yow's letter is included as Exhibit 20 to the *Defendants' Brief in Support of Response to Motion for Preliminary Injunction* (Response Brief) in the above-captioned case.

7. As a result of the resignations, Mr. Chadderdon ascended to the position of acting chair pursuant to the LPM bylaws.

8. Members of the LPM executive committee, including myself, were concerned that Mr. Chadderdon would not be able to effectively lead the party

because of his poor relationship with party members and his poor performance in his prior role of LPM political director.

9. In light of these concerns, executive committee members notified Mr. Chadderdon in mid-June that they intended to call a vote-of-no confidence to remove him from the executive committee during the July 9 convention.

10. Executive committee members also indicated their intent to conduct elections to fill the vacancies on the executive committee during the convention and asked that written notices of the elections be sent to all party members.

11. Mr. Chadderdon openly opposed these efforts and attempted to thwart them. Among other things, he refused to send notices of the elections as requested, so that he could then argue that the elections were improper.

12. In his opening comments at the convention on July 9, Mr. Chadderdon made clear that he had no intention to allow votes on his removal from the executive committee or on the filling of executive committee vacancies. Instead, he proposed a convention agenda that did not include either of those items. A videorecording of the convention is available at the following link: www.youtube.com/watch?v=0Z-VtaWAcHA&t=270s.

13. When a motion was made from the floor to approve a substitute agenda that included them, Mr. Chadderdon ruled the motion out of order on the grounds that notice of the intent to fill the vacancies had not been given.

14. Immediately thereafter, a subsequent motion was made to appeal Mr. Chadderdon's ruling to the full assembly on the grounds that the party customarily allowed items to be added to convention agendas by motion from the floor.

15. Mr. Chadderdon then ruled that motion out of order too, citing a provision of *Robert's Rules of Order* that prohibits the introduction of "frivolous or absurd" motions.

16. The delegates were outraged by Mr. Chadderdon's second ruling and responded by moving to replace him as convention chair. That motion passed by a standing vote.

17. Under the leadership of the replacement chair, Joe Brungardt, the convention delegates then proceeded to remove Mr. Chadderdon from the executive committee through a vote-of-no confidence and to fill the vacancies on the executive committee. As previously noted, I was elected to the position of first vice chair.

18. Following the convention, the newly selected executive committee met and conducted its work without objection for four months.

19. Then, in mid-November, Mr. Chadderdon sent a letter to the LPM judicial committee asking it to overturn his removal from the executive committee and to void the results of the officer elections conducted at the convention.

20. In support of those requests, Mr. Chadderdon alleged procedural error based on a novel theory that the July convention was a "special meeting" for

purposes of the bylaws and *Robert's Rules* and that, as a result, business could only be conducted if it was specifically referenced in the written document calling the meeting. Despite the extensive discussion of procedural issues during the July 9th convention and the executive committee meetings leading up to it, no one (including Mr. Chadderdon) had previously suggested this interpretation of the party's rules. Moreover, in my time as a member of LPM, I am aware of other incidents in which business items were considered at candidate nominating conventions that were not specifically referenced in the call to convention.

21. In December 2022, the LPM judicial committee, which consisted of three Mises Caucus members, considered Mr. Chadderdon's request and ruled in his favor. The judicial committee's opinion specifically indicated that the executive committee reverted back to the composition as it existed immediately prior to the July convention.

22. The release of the judicial committee opinion created substantial confusion within the party, because, to my knowledge, the judicial committee had never claimed the power to overrule decisions made by convention delegates. I have discussed this issue with individuals who have been active members of the LMP since for decades, and none of them were aware of any precedent for this type of action in the many years that the judicial committee had been in existence. Further, because the judicial committee is a "committee," my understanding is that its role, as defined

by section 50.4 of *Robert's Rules of Order*, is to “report its findings or recommendations to the assembly,” not to order self-executing remedies.

23. Accordingly, while some members of the elected executive committee were initially under the impression that they had been removed from their committee seats, they eventually concluded that was not the case. Rather, other members of the executive committee and I determined that we remained in our positions on the executive committee unless and until the party's members adopted the recommendations of the judicial committee and removed us from office.

24. Meanwhile, Mr. Chadderdon began acting as if the judicial committee's opinion was self-executing.

25. Sometime in early 2023, he began conducting so-called “executive committee” meetings of his own with a committee consisting of other members of the Mises Caucus who threw their support behind him. As a result of these actions, a contentious governance dispute emerged within the party, dividing its membership into two distinct factions.

26. Since becoming acting chair, and then later chair, of the LPM, I have made a concerted effort to inform the full LPM membership regarding the nature of the governance dispute, and to provide periodic updates on notable developments. A sampling of the email communications I have sent to the LPM membership are included as Exhibit 9 to the Response Brief. As the emails show, I have been honest

and transparent that my position as chair is disputed, and that the LNC supports Mr. Chadderdon's claim to the chairmanship.

27. In my role as LPM chair, I have been in contact with numerous Libertarian Party members from outside of Michigan who have informed me that they support the stand that I and other elected members of the LPM executive committee have taken against Mr. Chadderdon and the LNC. In my opinion, this out-of-state support is related to the fact that there are similar intraparty disputes that have arisen within other state-level affiliates since members of the Mises Caucus won a majority of the seats on the LNC at the 2022 national convention. Some of these disputes are described in the *Daily Beast* article attached as Exhibit 12 to the Response Brief, and they are well-known to those who closely follow Libertarian Party politics.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

7.7.23



Michael Saliba

(as amended in convention June 26, 2021)

I. NAME

The name of this organization shall be the “Libertarian Party of Michigan,” hereinafter referred to as the “Party” or “LPM”.

II. PURPOSE

The purpose of this organization is to further the principles of individual liberty as expressed in the Statement of Principles of the National Libertarian Party by nominating and working to elect candidates for political office and by entering into political information activities and affiliating with the National Libertarian Party.

III. OFFICERS

1. The officers of the Party shall be a chair, a first vice chair, a second vice chair, a secretary, a treasurer, and the Congressional district representatives described below, hereinafter referred to as the “Executive Committee.” These are the same individuals who shall serve as the directors of the “Libertarian Party of Michigan Executive Committee, Inc.” None of these offices shall be combined. All of these officers shall be elected to a two-year term at a regular convention of the Party by the attending delegates (as to the Congressional district representatives, those delegates from the respective districts) and shall take office immediately upon the close of such convention and shall serve until the final adjournment of the next regular convention.
2. At each regular convention, following the selection of those officers of the Executive Committee elected at large, the delegates from each Congressional district shall caucus to select one person residing in that district to serve as the Congressional district representative for that district.
3. The Executive Committee shall comprise the state central committee of the Party within the meaning of state law, notwithstanding any contrary provision of state law calling for a larger state central committee, different officers, or a different procedure for selection of officers or members of the Executive Committee.
4. The chair shall preside at all meetings of the Executive Committee and at all conventions. The chair shall be the chief executive officer of the Party. In the absence of directives from the

Executive Committee, the chair shall have the authority to speak for, and to generally manage the affairs of, the Party. Said authority includes the appointment of a Newsletter Director to ensure the timely publication of the "Michigan Libertarian." For purposes of Party representation at all National Libertarian Party conventions, the chair shall be a Michigan delegate and shall serve as head of the Michigan delegation.

5. The first vice chair shall act as assistant to the chair and shall perform the duties of the chair in his or her absence. The first vice chair shall also act as "affiliates director" helping affiliates organize, forming new affiliates, helping student groups organize and forming new student groups. The first vice chair shall also be responsible for organizing seminars to make certain that affiliate officers have the information necessary to work effectively with the LPM.
6. The second vice chair shall act as assistant to the chair, and in the absence of the chair and first vice chair, shall perform the duties of the chair. The second vice chair shall also act as "political director", recruiting candidates for public office and helping them organize their campaigns. The second vice chair shall also be responsible for organizing seminars to make certain that candidates have the information necessary to qualify and run effectively for public office.
7. The secretary shall be the recording officer of the Party, and be responsible for ensuring that member-accessible archives are preserved. Excepting the Party newsletter or press releases, the secretary shall be responsible for all regular communications within the Party and between the Party and outside individuals, groups, and organizations.
8. The treasurer shall receive, expend, and account for the funds of the Party under the supervision and direction of the Executive Committee.
9. The members of the Executive Committee shall meet in such times and places as they shall determine and shall govern all the affairs of the Party. A majority shall rule at meetings of the Executive Committee except for resolutions, which shall require a two-thirds vote of those present, or as otherwise required by these bylaws.
10. A member of the Executive Committee who misses three consecutive meetings of the Executive Committee or fails to perform his or her fiduciary duties may be removed from the

Executive Committee and replaced by a two-thirds vote at a regular meeting of the Executive Committee or a majority vote at convention following a motion for a vote of no confidence. All Executive Committee members must be notified of the intent to remove at least 14 days prior to the meeting. A Congressional district representative may be replaced by a majority vote of a congressional district caucus at any state convention. If the chair is so removed, the first vice chair shall assume the chair and a new first vice chair elected. If a Congressional district representative resigns or is so removed, then the Executive Committee must replace him or her with a person residing in the same Congressional district, who shall serve until the next state convention, at which time the caucus for that Congressional district shall select a replacement for the balance of his or her term.

11. All officers of the Party must be current members of the Party. An officer whose membership lapses must renew at the next meeting after written notice or be removed at that meeting.
12. There shall be a standing legislative committee to monitor, report on, and advocate for legislation on behalf of the Libertarian Party.
13. All officers of the Party shall be elected and serve without regard to biological sex, gender, race, ethnicity, creed, age, religion, sexual orientation, national origin, ancestry, marital status, physical appearance, or economic status.
14. Members of a standing or special committee (except for the Judicial Committee) may be appointed by the Executive Committee, by a committee chair, or by the LPM Chair. [All appointments must be approved by the Executive Committee. Appointments shall be made only at a meeting of the Executive Committee. Only voting members of the LPM shall be eligible for appointment as members of a standing committee. The Executive Committee may fix a maximum size to any committee (except for the Judicial Committee).

IV. LOCAL PARTY ORGANIZATIONS

1. Party members may form organizations entitled to be known as the “Libertarian Party” of their respective areas, subject to this Article.
2. The Executive Committee shall charter affiliate parties, each of which shall cover one or more counties of the state, hereinafter referred to as an “affiliate region”, from those organizations

requesting such status. A copy of the petitioning organization's proposed operating rules shall be submitted with the petition. No organization shall be so chartered which does not ratify the Statement of Principles of the Party or whose operating rules do not comply with these bylaws. The Executive Committee can arbitrate disputes between affiliates.

3. During years in which the Libertarian Party of Michigan is primary qualified, each affiliate party shall oversee the county and district conventions for those counties and districts within its affiliate region in accordance with state law (MCL 168.592, 168.594, 168.595, 168.599, 168.600, 168.601, and 168.602); except that:
 1.
 1. If an affiliate region covers more than one county or district:
 1. the affiliate may hold a combined convention for all counties and districts within the affiliate region at the same place(s) and/or via a synchronous electronic meeting;
 2. State convention delegates and alternates selected by the affiliate need not be apportioned to the individual counties or districts or their political subdivisions, but may be selected at large from all the counties and districts comprising the affiliate region, or at the affiliate's option, from LPM members residing anywhere in Michigan; and
 3. the affiliate may hold a combined convention for the election of a single affiliate executive committee, in lieu of separate executive committees for each county or district.
 2. An affiliate may elect in its discretion to adopt affiliate bylaws that organize the affiliate and the county(ies) and district(s) comprising its affiliate region in a manner different from the provisions of MCL 168.599 and 168.600. If the affiliate does so, then the officers and committees of the affiliate and the county(ies) and district(s) comprising its affiliate region shall be organized and selected in accordance with the affiliate's bylaws.
 3. For so long as the Party qualifies to elect precinct delegates at primary elections to county party

conventions under state law, the affiliate shall be required to accept precinct delegates so selected as delegates to its county and district conventions, but if the Party ever no longer qualifies to elect precinct delegates at primary elections, then the affiliate may set its own rules for qualifying delegates to its county and district conventions.

4. For purposes of this Article IV, Section 3, and Article VI, Section 4, below, any counties and districts in the State not organized as part of an affiliate region will together be deemed designated as one or more affiliate regions and overseen by the Executive Committee.
4. The autonomy of the affiliate Parties shall not be abridged by the Executive Committee, or any other committee of the Party, except as provided herein.
5. The Executive Committee shall have the authority to suspend affiliate party status from any organization by a two-thirds vote. Such suspension is subject to written appeal within thirty days of notification. Failure to appeal shall be construed as an act of secession by the affiliate party. The Executive Committee shall not suspend any affiliate party within a period of three months prior to a state Party convention.
6. The appeal of the affiliate party is to be directed to the Judicial Committee of the Party. Written arguments shall be sent to the Judicial Committee by representatives of the Executive Committee urging revocation and by representatives of the affiliate party opposing revocation. The Judicial Committee shall rule to either revoke the charter of the affiliate party or to reinstate the charter within thirty days of receiving the arguments and no later than thirty days prior to a State Party convention. Should the Judicial Committee fail to rule timely, the affiliate party shall be automatically reinstated with all rights and privileges pertaining thereto. The affiliate party may appeal the ruling of the Judiciary Committee to the Judicial Committee of the National Libertarian Party following the above procedure.

V. JUDICIAL COMMITTEE

1. The judicial power of the Party shall be vested in a Judicial Committee composed of three Party members. All of these committee members shall be elected to a two-year term at a regular convention of the Party by the attending delegates and shall take office immediately upon the close of such convention

and shall serve until the final adjournment of the next regular convention. No member of the Executive Committee may be a member of the Judicial Committee.

2. The Judicial Committee shall decide cases involving alleged violations of these bylaws or resolutions.

VI. CONVENTIONS

1. During years in which a Libertarian Party primary occurs, the Party shall hold a fall state convention after the date of the primary and not less than 60 days before the general November election in accordance with state law (MCL 168.591). During even-numbered years in which a Libertarian Party primary election is not required by state law, the Party shall hold a candidate nominating convention after the filing deadline for candidates to appear on Michigan's primary ballot and before the date of the primary. During odd-numbered years, the Party shall hold a regular state convention between April 1 and July 31, performing such business as required herein.
2. The Party shall also hold a state convention no later than six weeks prior to the scheduled first day of the Libertarian Party National Convention, hereinafter referred to as a "national delegate selection convention". The national delegate selection convention shall be for the purpose of selecting national convention delegates. The national delegate selection convention may also endorse any candidates for Secretary of State, Attorney General and Supreme Court to be formally nominated at the fall state convention in the same year. Votes for endorsement of candidates shall be made in the same manner as for nomination of candidates set forth in Article VII of these bylaws.
3. The Party shall hold a special convention within 45 days upon the call of the Executive Committee or when petitions are submitted by 10% of the current membership, specifying the purpose for the special convention.
4. The Executive Committee shall allocate delegates to all state conventions to be selected by each affiliate region in proportion and according to the number of votes cast within the affiliate region for the Party's most recent candidate for secretary of state (MCL 168.593 and 168.598). Delegates to the national delegate selection convention shall be allocated using the same method. An affiliate region may also select a number of alternates no greater than the number of delegates allocated to it.

1. The number of delegates to be seated at state conventions shall be calculated as 25% of the state members whose dues have been paid to the Libertarian Party of Michigan as of December 31st of the year prior to the state convention. There shall be a minimum of 175 seats available, though actual numbers may slightly vary due to numbers rounding up at the 0.5 interval.
2. The Executive Committee shall issue a call to each state convention to all affiliates no later than 60 days prior to the scheduled date of the state convention, which call shall specify the date and location of the state convention and the number of delegates each affiliate is entitled to select and send to the state convention. Notwithstanding any provision of state law requiring the Executive Committee to set a single date for counties and districts to hold conventions for the selection of delegates, each affiliate may select the date for its respective convention(s), so long as that date is at least 7 days prior to the state convention.
3. Each affiliate must submit the names, addresses and email addresses of its selected delegates and alternates to the LPM Credentials Committee no later than 7 days prior to a convention. Failure to submit such a listing by the deadline will cause no delegation to be registered from that affiliate. By seven-eighths vote, the convention may approve additional delegates and alternates whose names and addresses are submitted to the Credentials Committee during the convention.
4. The Executive Committee shall notify every Libertarian Party of Michigan and Michigan resident National Libertarian Party member, whose dues were current within 3 years, of the convention date, time and location no less than 30 days prior to the convention. Notification shall be made by at least one of the acceptable modalities for which contact information has been made available by the member. Acceptable modalities shall include email, phone, and United States Postal Service.
5. A majority shall rule at the convention except for the platform and resolutions of the Party which shall require a two-thirds vote of those present, or as otherwise required by these bylaws.

6. The Executive Committee shall have supervision and management of all conventions.
7. The officers of each convention shall be the officers of the Party.
8. A person must be a current member of the Libertarian Party of Michigan in order to serve as a delegate to a state convention. A person who has never been a member of the Libertarian Party of Michigan must become a member at least 30 days prior to a State convention, unless that person was a member of the National Libertarian Party at least 30 days prior to a State Convention, and becomes a dues paying member of the state party, before being allowed to vote at that convention.
9. Members in good standing who were duly elected as delegates shall not be denied delegate status at the business sessions of a convention. Additional charges may be charged to cover other materials available at the convention.

VII. NOMINATION OF CANDIDATES

1. Nomination of candidates for public office shall be made in accordance with state law, via primary, district caucus or state convention as necessary. No candidate may be nominated for an office for which he/she is legally ineligible to serve.
2. Delegates to the National Convention shall be elected at a national delegate selection convention by nominations from the floor. Delegates may be appointed by the Executive Committee if the allotted quota is not met. Rules governing delegate procedures shall be determined by action of the Convention or, in the absence of directives from the Convention, by the Executive Committee. Those provisions of state law governing the selection of national convention delegates shall not apply to the Party's selection of national convention delegates, and no national convention delegate shall be bound by law to vote for a particular candidate.
3. The Party's nominee for each office shall be chosen by a majority vote of the delegates in attendance at the time of voting. If no candidate has a majority, the candidate with the least number of votes shall be struck from the next vote until one candidate receives a majority.
4. All votes for candidates for public or Party office shall always include "None of the Above."
5. Votes cast for "None of the Above" in voting on the Party's nominees for public office or the Party officers shall be considered valid. Should a majority of the votes be cast for "None of the

Above” in voting for a public office, no candidate shall be nominated for that office. Should “None of the Above” be selected for any Party office, that position shall be declared vacant and none of the losing candidates for that position may be selected to fill the vacancy for the term of office. If a delegate votes for “None of the Above” in a race in which more than one candidate is elected, they may not vote for an additional candidate.

VIII. MEMBERSHIP

Membership shall be granted to any person who affirms the Statement of Principles and whose LPM dues are current.

IX. ELECTRONIC MEETINGS AND PROCEDURES

1. Asynchronous voting procedure, such as via email ballot, are strictly prohibited for official business of any recognized body of the Party, including the executive committee, unless there is an agreement to do asynchronous voting in a unanimous motion at a synchronous meeting. This does not prohibit other synchronous forms of communication and voting, such as conference call or videoconferencing, to be used for official business.
2. The Libertarian Party of Michigan may hold electronic meetings for official party business of any recognized body of the State Party, including the Libertarian Executive Committee as well as any committees created by the Libertarian Executive Committee, unless specifically prohibited from doing so during their creation. Any official party business conducted via electronic means shall comply with Electronic Meetings section of the most current edition of Robert’s Rules of Order, Newly Revised.

X. FISCAL YEAR

The fiscal year of the Party shall end December 31.

XI. LEGAL AND PARLIAMENTARY AUTHORITY

1. The Libertarian Party of Michigan, in the exercise of its constitutional rights of free association and speech, as affirmed by the US Supreme Court ruling in *Eu, et al., vs. San Francisco Democratic Committee, State Central Committee of the Libertarian Party of California, et al.*, reserves the right to accept or decline the application of Michigan statutory provisions, which appear to govern its affairs. The incorporation of statutory provisions in these bylaws is voluntary and is subject to the foregoing reservation. Any violations of statutory provisions by

these bylaws are deliberate and will take precedence over such statutory provisions.

2. Robert's Rules of Order Newly Revised shall be the parliamentary authority for all matters of procedure not specifically covered by the bylaws or convention rules of the Party.

XII. AMENDMENTS

These bylaws may be amended by a two-thirds vote of the delegates present at a convention occurring in an odd-numbered year only.

XIII. USE OF PARTY RESOURCES

The Party does not support, condone, or give candidates of other political parties access to mailing lists, contact information, or administrative access to online social media accounts of the Libertarian Party of Michigan for use with their campaign.

XIV. EFFECT

These bylaws shall take effect immediately upon adoption.

Previous bylaws may be viewed in the [Historical Archives](#).

STATE OF MICHIGAN
WASHTENAW COUNTY CIRCUIT COURT

COMERICA BANK

HON: Timothy P. Connors

Plaintiff

Case No. 23-000557-CB

v

LIBERTARIAN PARTY OF MICHIGAN
EXECUTIVE COMMITTEE, INC.,
JOSEPH BRUNGARDT, ANDREW
CHADDERDON, MICHAEL SALIBA
and ANGELA THORNTON aka ANGELA
CANNY

Defendants

STANCATO TRAGGE WELLS PLLC
Henry Stancato (P29538)
For Comerica Bank
PO Box 270
Grosse Ile, MI 48138-0270
(248) 731-4500
hstancato@stwlawfirm.com

FIRST AMENDED COMPLAINT

Comerica Bank exercises its right to make a first amended complaint as follows:

JURISDICTION, PARTIES AND VENUE

1. This action constitutes a business or commercial dispute within the meaning of MCL 600.8031(c)(iii) because LPMEC is a nonprofit organization, and the claims arise out of that party's organizational structure, governance, or finances.
2. This is an action for interpleader relief under MCR 3.603 or, alternatively, for declaratory relief under MCR 2.605.
3. Comerica Bank, as stakeholder, seeks to interplead \$38,233.30 belonging, on information and belief, to its former deposit customer, Libertarian Party of

Michigan Executive Committee, Inc. (“LPMEC”). Comerica seeks this relief because a dispute among the individual defendants concerning which of them is legally authorized to take receipt of funds and instruments belonging to the corporate defendant leaves Comerica open to the risk of multiple liability.

4. Comerica Bank (“Comerica”) is a Texas banking association authorized to conduct banking operations in Michigan. Comerica operates several branches in Washtenaw County.
5. LPMEC is a Michigan non-profit corporation with a registered office in Oakland County, Michigan.
6. Joseph “Joe” Brungardt is an individual who resides, on information and belief, in Macomb County, Michigan
7. Andrew Chadderdon is an individual who resides, on information and belief, in Wayne County, Michigan.
8. Michael “Mike” Saliba is an individual who resides, on information and belief, in Macomb County, Michigan.
9. Angela Thornton, also known as Angela Canny, is an individual who resides, on information and belief, in Genesee County, Michigan.
10. Venue is properly laid in Washtenaw County because the cause of action arose, in part, at a Comerica branch in Washtenaw County as described below.

FACTUAL ALLEGATIONS

11. Before March 22, 2023, LPMEC was a deposit customer of Comerica with respect to five deposit accounts.

12. On or about February 13, 2023, Joe Brungardt was the sole signer of record for LPMEC deposit account xxx6457. At that time, Comerica's books and records reflected that Joe Brungardt was the LPMEC president.
13. On that date, Joe Brungardt signed documentation at Comerica branch 68 adding Mike Saliba and Angela Thornton as additional signers on account xxxx6457.
14. On or about February 22, 2023, Andrew Chadderdon appeared at a different Comerica branch (219) in Washtenaw County asserting that he, rather than Mr. Brundgardt, was the duly elected LPMEC president and seeking to substitute himself in place of the signers of record on account xxxx6457.
15. Comerica staff informed Mr. Chadderdon that it would not process his request without certification by the LPMEC treasurer as to his status as president.
16. At that time, publicly available information through the State of Michigan Department of Licensing and Regulatory Affairs Corporations Online Filing System ("LARA") indicated that the LPMEC treasurer was Joseph Ziemba.
17. On or about February 23, 2023, Joseph Ziemba certified to Comerica that Andrew Chadderdon was the LPMEC president. This certification was consistent with the publicly available information through LARA at the time which identified Mr. Chadderdon as the LPMEC president.
18. Accordingly, Comerica processed Mr. Chadderdon's request to be substituted as signer for LPMEC on all five of that corporation's deposit accounts as well as a change of address for the deposit customer. Then Mr. Chadderdon closed two existing deposit accounts to open two new successor deposit accounts in the name of LPMEC.

19. On or about March 9, 2023, Mike Saliba appeared at Comerica branch 68 to complain about having been removed as an account signer for LPMEC.
20. On the same date, an attorney named Nick Curcio transmitted a letter purporting to act as attorney for LPMEC and asserting on behalf of LPMEC that Andrew Chadderdon was not a LPMEC officer and that some of the LARA filings for LPMEC were fraudulent.
21. On March 10, 2023, Mike Saliba returned to Comerica branch 68 with newly filed LARA documentation that contradicted, in large part, the previously filed LARA materials that Comerica reviewed when processing Andrew Chadderdon’s claim to be LPMEC president.
22. In reaction to this controversy, Comerica unsuccessfully attempted to reach Daniel Ziembra to determine whether he, in his capacity as LPMEC secretary, would certify the materials now being presented by Nick Curcio as proof that LPMEC had removed Andrew Chadderdon as president.
23. When this effort proved unsuccessful, Comerica decided to exercise its contractual right to terminate its deposit relationship with LPMEC.
24. To execute its decision terminating the deposit relationship with LPMEC, Comerica issued cashier’s checks as follows representing the closing balances for each of the four deposit accounts with positive balances (Account xxx9283 was at zero balance at this time):

Account No	Cashier’s Check No	Amount
xxx6457	001684797	\$21,839.69
xxx6465	001684795	7,476.75
xxx6440	001684796	7,989.47
xxx4602	001684794	927.39
	Total:	\$38,233.30

25. On or about March 22, 2023, Comerica mailed the cashier's checks to 30005 Malvern St. Westland, Michigan which was the address of record on Comerica's books at that time for LPMEC. On information and belief, this is an address at which Andrew Chadderdon receives mail.
26. On information and belief, defendants Brungardt, Saliba and Thornton contest whether delivery of the cashier's checks to the address provided by Chadderdon constitutes payment by Comerica of its debt to LPMEC.
27. As of this date, none of the cashier's checks had been presented to Comerica for payment.

COUNT I-INTERPLEADER

28. As a matter of law, a deposit relationship between a bank and its depositor is a debtor/creditor relationship in which the bank is indebted to its depositor for the amount of the deposit balance.
29. Comerica does not contest that it is indebted to LPMEC in the amount of \$38,233.30.
30. Termination of Comerica's deposit relationship with LPMEC requires, therefore, that Comerica discharge its debt by payment of this deposit balance to LPMEC.
31. The competing, mutually exclusive claims by the individual defendants make it impossible for Comerica to identify which of them is authorized to endorse and negotiate instruments payable to the order of LPMEC.
32. If Comerica unilaterally refuses to honor the any of the cashier's checks, then Comerica incurs the risk of liability for expenses, interest and consequential damages under UCC 3-411; MCL 440.3411(2)

33. Comerica, on the other hand, has no independent means for assessing the reliability of representations of the individual defendants who challenge Mr. Chadderdon's authority to take possession of the cashier's checks on behalf of LPMEC.
34. There is no mechanism available, therefore, for LPMEC to make a facially valid declaration of loss and claim under UCC 3-312; MCL 440.3312.
35. Without judicial relief, Comerica is unable to protect itself from the risk of multiple liability.
36. Accordingly, Comerica seeks interpleader relief under MCR 3.603 and proposes to interplead an amount equal to LPMEC's aggregate closing deposit balance less whatever amount this Court may award under MCR 3.603(E) as reimbursement for stakeholder expenses and fees.
37. In order to preserve the possibility for complete relief while this Court considers the merits of the individual defendants' competing claims, an order restraining negotiation and payment on the cashier's checks is appropriate under UCC 3-602; MCL 440.3602(5)(a).

COUNT II DECLARATORY RELIEF

38. Alternatively, Comerica seeks declaratory relief under MCR 2.605.
39. Comerica has become involuntarily entangled in an actual controversy among the individual defendants concerning which of them is authorized to function as an LPMEC officer.
40. This Court otherwise has jurisdiction over this dispute on the basis of its power to grant interpleader and other equitable relief.

41. Comerica seeks a declaratory judgment that identifies who is entitled to take custody LPMEC's deposit balance from Comerica.

COUNT III

42. All of the defendants except Andrew Chadderdon have filed a counterclaim asserting that Comerica is liable for the amount of draws against LPMEC's deposits during the time that Andrew Chadderdon acted as sole signer for LPMEC.
43. When he files a responsive pleading, Andrew Chadderdon may make a corresponding claim against Comerica arising out of any draws made by the other individual defendants while they acted as signers for LPMEC.
44. Comerica contests whether it should be held liable to reimburse any of the defendants for any draws made by any of the individual defendants.
45. In the event, however, that Comerica is held liable for honoring any draw authorized by any individual defendant, then Comerica ask for a corresponding award of damages against that individual defendant.

WHEREFORE, Comerica Bank ask for the following relief:

- A. Interpleader relief:
 1. An order enjoining Comerica from paying, and all of the defendants from endorsing or negotiating, the cashier's checks issued by Comerica payable to the order of LPMEC. (Check Nos 001684794, 001684795, 001684796 and 001684797)
 2. As award under MCR 3.603(E) of Comerica's actual costs as stakeholder.
 3. An order requiring Comerica to deposit with the Clerk of this Court the difference between the interpleader stake (i.e., \$38,233.30) and the MCR 3.603(E) award.
 4. An order dismissing Comerica Bank with prejudice upon completion of its obligation to tender the interpleader stake to the Clerk of this Court.

B. Declaratory judgment: As an alternative to interpleader relief, an adjudication of the controversy among the individual defendants that identifies which parties to whom Comerica Bank may deliver the aggregate deposit balance owned by Comerica to LPMEC.

C. An award of money damages along with an award of attorney fees, expenses, and costs in addition to whatever additional interest, penalties and sanctions may be allowed by law or court rule.

Date: May 23, 2023

Stancato Tragge Wells PLLC
/s/ Henry Stancato (P29538)
Attorneys for Comerica Bank
PO Box 270
Grosse Ile, MI 48138-0270
(248) 731-4500
hstancato@stwlawfirm.com



**Libertarian Party of Michigan
State Convention
Hilton Garden Inn, Lansing
April 1, 2023**

Convention Minutes

Call to Order

- Chair Mike Saliba calls convention to order at 9:10am [00:08:50 during recording]
- Mike Saliba: opening remarks
- Brian Ellison: motion to appoint Greg Stempfle as convention secretary, seconded
- Greg Stempfle accepts
- Motion approved by voice vote

Credentials Report

- Larry Johnson: There are 7 new attendees that are not currently delegates which were approved by affiliates (Tim O'Brien, Nancy O'Brien, Jon Coon, Renae Coon, Will White, Keith Bilby, and Norm Paterson)
- Motion to approve delegates moved and seconded, requires 7/8
- Passes by voice vote
- Larry Johnson gives credentials: 66 delegates, 34 for 50%, 45 for 2/3rds

Approval of Agenda

- Motion to approve agenda moved and seconded
- Greg Stempfle moves to amend agenda to remove "Approval of Previous Convention Minutes" since they were not included in the convention packet, seconded
 - Various points of information, lack of inclusion of minutes was an oversight and should be considered at next convention.
 - Scotty Boman: motion to put previous minutes on the next convention agenda
 - Mike Saliba rules out of order
 - Amendment passes by voice vote
- Main motion to approve agenda passes by voice vote
- Motion to bring previous convention minutes before next convention
- Will White: they will be automatically
- Motion withdrawn

Approval of Convention Rules

- Joe Brungardt: Motion to approve rules, seconded
- 2nd Motion passes by voice vote

Officer Reports

- **Chair Report:** Mike Saliba gives his officer report, recaps Judicial Committee ruling and why two groups claim to be the LEC/LPM, status of national lawsuit has been dropped, opens floor for question
- Lanie Nix POI about Bureau of Election and who will decide which group has ballot access
- Mike: Hopefully a lawsuit will help settle matter, Comerica has frozen bank account, set precedent that we are the legal party
- Brian Ellison asks about treasury report
- Mike Saliba: treasurer report will be next

- Scotty Boman: POI about Andrew Chadderdon email claiming to have bank account
- Mike Saliba: Not confirmed with bank, skeptical that happened
- Tulio Proni: Who is on bank account?
- Mike Saliba: Should be himself, Joe Brungardt, and Angela Thornton but Comerica handed it over without one of the signers there. Issue has now been filed with state banking regulators.
- Lannie Nix: POI asks about timeframe
- Mike Saliba: Does not know.
- Brian Ellison: Our attorney is confident there will be a resolution prior to ballot access being an issue.
- **2nd Vice Chair Report (Political Director):** Mary Buzuma gives her officer report, thanks last year's candidates and campaign support committee and affiliates, leadership for submitting campaign paperwork locally, will not be seeking reelection due to family and personal responsibilities, and thanks all of us.
- **Treasurer Report:** Angela Thornton acting Treasurer gives her report, due to account frozen limited info is available, we spent no money from the bank account
- Approximately \$45,000 between 3 accounts.
- We raised almost for \$10,000 legal defense and almost \$3,000 for convention.
- Andrew Duke: What is projected legal cost?
- Mike Saliba: Will have more info on Monday, have been at Comerica 10-15 times in last 3 weeks.
- Scotty Boman: Point of personal privilege: please document convention with video and share on social media
- Mike Saliba: there is a live zoom stream currently and would like past members to speak to the floor during down time about your time in the party

Bylaws Committee Report

- Jon Elgas takes over chairing convention and thanks committee members
- Greg Stempfle motion to amend by substitution Proposals 1, 2, and 6 in the Bylaws Committee Report with a single proposal from Brian Ellison. The Ellison proposal combines language three committee proposals into a single more concise and streamlined version. Seconded.

Brian Ellison Proposals 1, 2, and 6:

Proposal 1) Removal of members of the Executive committee

Proposal 2) Removal, replacement, and succession of officers

Proposal 6) Resignations of the LEC

III. OFFICERS

~~10) A member of the Executive Committee who misses three consecutive meetings of the Executive Committee or fails to perform his or her fiduciary duties may be removed from the Executive Committee and replaced by a two thirds vote at a regular meeting of the Executive Committee or a majority vote at convention following a motion for a vote of no confidence. All Executive Committee members must be notified of the intent to remove at least 14 days prior to the meeting. A Congressional district representative may be replaced by a majority vote of a congressional district caucus at any state convention. If the chair is so removed, the first vice chair shall assume the chair and a new first vice chair elected. If a Congressional district representative resigns or is so removed, then the Executive Committee must replace him or her with a person residing in the same Congressional district, who shall serve until the next state convention, at which time the caucus for that Congressional district shall select a replacement for the balance of his or her term.~~

Replace with:

10) Any member of the Executive Committee may resign upon written notice to the chair and/or secretary, which shall take immediate effect. Absence from three consecutive regular meetings, by any Executive

Committee member, shall be considered a constructive resignation, and shall take immediate effect upon close of the third meeting. A member of the Executive Committee may be removed from the Executive Committee by a two-thirds vote at a regular meeting of the Executive Committee. All Executive Committee members must be notified of the intent to remove at least 14 days prior to the meeting. A member of the Executive Committee may be removed from the Executive Committee by a majority vote at any state convention, without the need for prior notice. When such a motion is made only those whom the member represents (either district or state wide) shall vote first on removal, and if removed a replacement shall be selected immediately by the same body.

And add:

11) If the chair is vacated, the first vice chair shall assume the duties of the chair until a new chair is elected at the next regular state convention. If both the chair and first vice chair are vacated, the Executive Committee must appoint someone to fill the role of the chair who shall serve until the next regular convention. If the first vice chair, second vice chair, secretary, or treasurer is vacated, the Executive Committee may appoint someone to fill that role who shall serve until the next regular convention. If a Congressional district representative position is vacated, the Executive Committee may only appoint someone who has been nominated by a caucus of members residing in the same Congressional district to fill that role who shall serve until the next regular convention. Any vacancies that occur in the interim between conventions, whether filled by the Executive Committee or not, shall be filled by majority vote of eligible delegates at the next state convention, without the need for prior notice.

And renumber current sections 11-14 accordingly

- Point of privilege: Request to enlarge text on screen.
- Greg Stempfle displays both proposals on screen and explains difference between versions.
- Point of privilege: Delegates do not have a copy of the new proposal.
- Brian Ellison speaks to motion and reads proposal.
- Jon Coon: POI Does any member of the bylaws committee object to this substitution?
- Informal discussion of
- Members are the Bylaws Committee are asked if they approve of this substitution. Approximately 6 members approve with Scotty Boman being the only objection, for the record.
- Lanie Nix: POI Are there two bylaws committees? One for each side?
- Jon Elgas: Unaware if the other board has a committee.
- Lanie Nix: POI asks members of committee to stand so they can be recognized (Jon Elgas, Greg Stempfle, Scotty Boman, Dave Canny, Jim Fulner, Gregg Smith, Angela Thornton, and Jami Van Alstine)
- Tulio Proni: POI having trouble reading proposals and asks about who gets to nominate replacements on the LEC.
- Brian Ellison clarifies proposal language
- Joe Brungardt clarifies we are only voting to substitute consideration of the proposal, after this motion, then we can discuss the language of the proposal itself.
- Bill Gelineau speaks in favor of substitution motion
- Brandon Warzybok speaks in favor of substitution motion
- Scotty Boman speaks against substitution motion
- Joe Brungardt speaks in favor of substitution motion
- Kyle McCauley speaks in favor of substitution motion
- Nancy O'Brien moves to "table discussion of this proposal until after lunch until more time to review", seconded
- POI: Table discussion of proposals 1,2, and 6?
- Jon Elgas: Yes

- Kyle McCauley: POI asks Greg Stempfle about other bylaws proposals
- Greg Stempfle: the other proposals are shorter and should go more smoothly
- Kyle McCauley speaks against tabling
- Joe Brungardt moves to amend to “table until after other proposals (3-5,7-10) are considered”
 - Will White speaks against tabling
 - Greg Stempfle: Printed copies of Brian’s proposal are being made
 - Lanie Nix POI: We will still have chance to amend if this passes?
 - Jon Elgas: yes
 - Rafael Wolf announces posting of Brian’s proposal on the convention website
 - Objection raised to calling the question on amendment to tabling motion
 - Andrew Hall speaks against amendment
 - Scotty Boman speaks in support
 - Informal discussion
 - Joe Brungardt: call all previous questions
 - Vote on amendment passes by voice vote
- Vote on main motion to table fails by voice vote.
- Back to motion to substitute Bylaws Committee Proposals with Ellison Proposal, printed copies are being distributed. (10:19)
- Informal discussion while delegates read proposal
- Jon Elgas calls question on motion to substitute Bylaws Committee Proposals with Ellison Proposal
- Motion passes by voice vote.
- Scotty Boman moves to amend proposal, seconded

10) ... A member of the Executive Committee may be ~~removed from~~ relieved from their duties on the Executive Committee by a two-thirds vote at a regular meeting of the Executive Committee. All Executive Committee members must be notified of the intent ~~to remove of said relief~~ at least 14 days prior to the meeting. A member of the Executive Committee may be ~~removed from~~ so relieved from their duties on the Executive Committee by a majority vote at any state convention, without the need for prior notice. When such a motion is made only those whom the member represents (either district or state wide) shall vote first on ~~removal~~ said relief, and if ~~removed~~ relieved, a replacement shall be selected immediately by the same body.

{Note: the proposed language above is different than what was proposed by Scotty on the floor as this language was tweaked by him when it was being transcribed onto the screen. GS}

- Kyle McCauley POI What is practical effect?
- Scotty Boman: To comply with Michigan corporate law.
- Will White speaks against
- Jami Van Alstine speaks in favor
- Brandon Warzybok speaks against
- Jon Coon speaks in favor
- Amendment passes by voice vote.
- Bill Hall moves to amend and seconded
 - Add “fails to perform his or her fiduciary duties”
 - Will White POI about grammar of proposal
 - Brandon Warzybok offers replacement language, “for cause”.
 - Brian Ellison speaks against
 - Section with location of proposed amendment:
“A member of the Executive Committee may be relieved from their duties on the Executive Committee, for cause, by a two-thirds vote at a regular meeting of the Executive Committee.”

- Amendment passes by voice vote
- Kyle McCauley calls question
- **Proposal adopted by voice vote**

Proposal 3) Change how we refer to conventions in Odd and Even years in bylaws

III. OFFICERS

1. The officers of the Party shall be a chair, a first vice chair, a second vice chair, a secretary, a treasurer, and the Congressional district representatives described below, hereinafter referred to as the “Executive Committee.” These are the same individuals who shall serve as the directors of the “Libertarian Party of Michigan Executive Committee, Inc.” None of these offices shall be combined. All of these officers shall be elected to a two-year term at an odd-numbered year regular convention of the Party by the attending delegates (as to the Congressional district representatives, those delegates from the respective districts) and shall take office immediately upon the close of such convention and shall serve until the final adjournment of the next odd-numbered year regular convention.
2. At each odd-numbered year regular convention, following the selection of those officers of the Executive Committee elected at large, the delegates from each Congressional district shall caucus to select one person residing in that district to serve as the Congressional district representative for that district.

V. JUDICIAL COMMITTEE

1. The judicial power of the Party shall be vested in a Judicial Committee composed of three Party members. All of these committee members shall be elected to a two-year term at an odd-numbered year regular convention of the Party by the attending delegates and shall take office immediately upon the close of such convention and shall serve until the final adjournment of the next odd-numbered year regular convention. No member of the Executive Committee may be a member of the Judicial Committee.

VI. CONVENTIONS

1. During years in which a Libertarian Party primary occurs, the Party shall hold a regular fall state convention after the date of the primary and not less than 60 days before the general November election in accordance with state law (MCL 168.591). During even-numbered years in which a Libertarian Party primary election is not required by state law, the Party shall hold a ~~candidate nominating~~ regular convention for, but not limited to, the purpose of candidate nominations after the filing deadline for candidates to appear on Michigan’s primary ballot and before the date of the primary. During odd-numbered years, the Party shall hold a regular state convention between April 1 and July 31, performing such business as required herein.
2. The Party shall also hold a regular state convention no later than six weeks prior to the scheduled first day of the Libertarian Party National Convention, hereinafter referred to as a “national delegate selection convention”. The national delegate selection convention shall be for, but not limited to the purpose of selecting national convention delegates. The national delegate selection convention may also endorse any candidates for Secretary of State, Attorney General and Supreme Court to be formally nominated at the regular fall state convention in the same year. Votes for endorsement of candidates shall be made in the same manner as for nomination of candidates set forth in Article VII of these bylaws.

- Jon Elgas reads proposal
- Andrew Duke: POI regular vs special convention
- Luke Sciberras clarification of JC term
- Brandon Warzybok POI about conflicts with proposal 5
- **Proposal adopted by voice vote**

Proposal 4) Changes for special conventions

VI. CONVENTIONS

3. The Party shall hold a special convention within 45 days upon the call of the Executive Committee or when petitions are submitted by ~~10%~~ 15% of the current membership who have been members for at least 30 days, specifying the purpose for the special convention. A special convention must provide notice to members as specified in Article VI Section 4.D. Due to their expedited nature, special conventions are exempt from the affiliate delegate allocation described in Article VI Section 4 and notice requirements in Article VI Section 4.B or as required by law. Instead, all eligible members of the Party who attend and register at a convention shall be delegates. A special convention may be held in accordance with the Electronic Meetings and Procedures set forth in Article IX.

4.2. The Executive Committee shall issue a call to each regular state convention to all affiliates no later than 60 days prior to the scheduled date of the state convention, which call shall specify the date and location of the state convention and the number of delegates each affiliate is entitled to select and send to the state convention. ***

- Jon Elgas reads proposal
- Brian Ellison moves to amend by substitution, seconded

VI. CONVENTIONS

3. The Party shall hold a special convention within 45 days upon the call of the Executive Committee or when petitions are submitted by ~~10%~~ 15% of the current membership who have been members for at least 30 days, specifying the location, date, time and purpose for the special convention. The petitioners shall organize and fund the special convention. The Executive Committee must notify affiliates of the location, date, time and purpose of the special convention, immediately upon receipt of petitions. The Executive Committee must provide notice of the special convention to the members.

The Executive Committee must provide notice to members as specified in Article VI Section 4.4. Due to their expedited nature, special conventions are exempt from the affiliate delegate allocation described in Article VI Section 4 and notice requirements in Article VI Section 4.2 or as required by law. Delegate apportionment for special conventions will match the apportionment of the immediately preceding state convention.

- Brian Ellison reads and speaks to proposal
- Mike Saliba reports there are 41 delegates at the Wixom event
- Scotty POI about apportionment by affiliate
- Brian Ellison this proposal speeds up delegate apportionment by 15 days, without apportionment, members of the national party in other states could join LPM day of convention and be a delegate
- Mark King POI asks about membership requirements
- Brian Ellison requirements are unchanged by this proposal
- Joe LeBlanc speaks in favor
- Mike Saliba brings up Rule 6. No member may speak in debate more than once on the same question on the same day, or longer than two minutes, without permission of the convention granted by a two-thirds vote without debate.
- Andrew Duke POI does proposal allow electronic meeting
- Brian Ellison: Proposal does not [another proposal does however]
- Bill Gelineau speaks in favor
- Will White speaks in favor
- Jon Coon POI delegate apportionment from previous conventions
- Scotty Boman POI
- Question called on substitution

- Motion passes by voice vote
- Bill Gelineau announcement regarding lunch buffet tickets
- **Proposal adopted by voice vote**

[Note: Article VI Section 4.4. and Article VI Section 4.2 are intended to refer to Article VI Section 4.D. and Article VI Section 4.B, respectively.]

Proposal 5) Change how Judicial Committee is Selected

V. JUDICIAL COMMITTEE

1. The judicial power of the Party shall be vested in an ad hoc Judicial Committee composed of three total Party members. Each side shall appoint one member and the third member will be agreed upon by both parties when alleged violations of these bylaws or resolutions occur. All of these committee members shall be elected to a two-year term at a regular convention of the Party by the attending delegates and shall take office immediately upon the close of such convention and shall serve until the final adjournment of the next regular convention. No member of the Executive Committee may be a member of the Judicial Committee.
2. {New section} The ad hoc Judicial Committee shall submit a report to the Executive Committee on cases involving alleged violations of these bylaws or resolutions, and shall have the power to convene a Special Convention in the event the Executive Committee does not accept the recommendations of the Judicial Committee within 15 days.
3. {New section} The ad hoc Judicial Committee shall be dissolved upon either the acceptance of the recommendations by the Executive Committee or the adjournment of any Special Convention called for the purpose of resolving a violation as outlined in Article V Section 2, whichever is later.
4. {New section} All cases facing the Judicial Committee shall be submitted to the LEC Secretary who shall then commence the selection proceedings of the Judicial Committee within 14 days.

{Renumber remaining section}

5. The Judicial Committee shall decide cases involving alleged violations of these bylaws or resolutions.

- Jon Elgas reads proposal
- Bill Hall moves to amend replacing language of Section 5 with "The Judicial Committee's jurisdiction shall be limited to cases involving alleged violations of the bylaws or resolutions by the Executive Committee, its members."
- Luke Sciberras proposes that Section 5 be moved up to Section 1, seconded, accepted as friendly amendment
- Informal discussion
- Question called
- Amendment passes by voice vote
- Brian Ellison moved to amend, by adding "by a majority vote of a Judicial Committee," to Article VI.3. Seconded

VI. CONVENTIONS

3. The Party shall hold a special convention within 45 days upon the call of the Executive Committee, by a majority vote of a Judicial Committee, or when petitions are submitted by 15% of the current membership who have been members for at least 30 days, specifying the location, date, time and purpose for the special convention. ***
 - o Informal discussion
 - o Question called, amendment passes by voice vote

- Andrew Duke POI wants to broaden who cannot serve on JC
- Informal discussion
- Bill Gelineau calls for order
- Brian Ellison moves to amend by adding “or an interested party in the appeal”, seconded
 - Amendment passes by voice vote
- ~~Brandon Warzybok moves to amend or its members, or its directors.~~
 - Brian Ellison moves to substitute “directors” with “appointees”.
 - Amendment passes by voice vote
- Main motion as amended:
 1. The Judicial Committee’s jurisdiction shall be limited to cases involving alleged violations of the bylaws or resolutions by the Executive Committee, its members, or it’s appointees.
 2. The judicial power of the Party shall be vested in an ad hoc Judicial Committee composed of three total Party members. Each side shall appoint one member and the third member will be agreed upon by both parties when alleged violations of these bylaws or resolutions occur. All of these committee members shall be elected to a two-year term at a regular convention of the Party by the attending delegates and shall take office immediately upon the close of such convention and shall serve until the final adjournment of the next regular convention. No member of the Executive Committee or an interested party in the appeal may be a member of the Judicial Committee.
 3. {New section} The ad hoc Judicial Committee shall submit a report to the Executive Committee on cases involving alleged violations of these bylaws or resolutions, and shall have the power to convene a Special Convention in the event the Executive Committee does not accept the recommendations of the Judicial Committee within 15 days.
 4. {New section} The ad hoc Judicial Committee shall be dissolved upon either the acceptance of the recommendations by the Executive Committee or the adjournment of any Special Convention called for the purpose of resolving a violation as outlined in Article V Section 2, whichever is later.
 5. {New section} All cases facing the Judicial Committee shall be submitted to the LEC Secretary who shall then commence the selection proceedings of the Judicial Committee within 14 days.
 6. ~~The Judicial Committee shall decide cases involving alleged violations of these bylaws or resolutions.~~

VI. CONVENTIONS

3. The Party shall hold a special convention within 45 days upon the call of the Executive Committee, by a majority vote of a Judicial Committee, or when petitions are submitted by 15% of the current membership who have been members for at least 30 days, specifying the location, date, time and purpose for the special convention. The petitioners shall organize and fund the special convention. The Executive Committee must notify affiliates of the location, date, time and purpose of the special convention, immediately upon receipt of petitions. The Executive Committee must provide notice of the special convention to the members.

- Scotty Boman speaks against
- Brian Ellison speaks in favor
- **Proposal adopted by voice vote**

- Proposal 6 from the bylaws committee not considered due to being substituted for by Ellison proposal
- Joe Brungardt moves to extend time to noon, passes by voice vote

Proposal 7) Proposal to allow electronic meetings

IX. ELECTRONIC MEETINGS AND PROCEDURES

{New section}

3. The Libertarian Party of Michigan may hold electronic meetings to conduct special conventions and any conventions in situations where natural disaster or regulatory actions prevent the use of a meeting venue.

- Jon Elgas reads proposal
- Joe Brungardt moves to amend by substitution
 - 3. The Libertarian Party of Michigan may hold electronic meetings to conduct conventions.
 - Greg Creswell speaks against
 - Jason Brandenburg speaks in favor
 - Brian Ellison speaks against
 - Lanie Nix mentions hybrid conventions
 - Andrew Duke clarifies something
 - Brandon Warzybok speaks in favor
 - Vote on amendment fails by voice vote
- Mark King motion to amend "...in situations where natural disaster, ~~or~~ regulatory actions, or any extreme circumstance prevent the use of a meeting venue."
 - Amendment passes by voice vote
- Proposal as amended
 - 3. The Libertarian Party of Michigan may hold electronic meetings to conduct special conventions and any conventions in situations where natural disaster, regulatory actions, or any extreme circumstance prevent the use of a meeting venue.
- Main motion passes
- Bill G calls for division
- Division called: In favor 42, Against 13
- **Proposal adopted by standing vote**

Proposal 8) Proposal to further restrict Use of party resources

XIII. USE OF PARTY RESOURCES

The Party does not support, condone, or give candidates of other political parties access to mailing lists, contact information, or administrative access to online social media accounts of the Libertarian Party of Michigan for use with their campaign. Those same contact resources may not be used by organized party caucuses for fundraising or promotional purposes other than for activities solely naming and benefitting the Libertarian Party of Michigan, its affiliates, the National Libertarian Party, Libertarian Party candidates, or any nonpartisan candidate endorsed at convention.

- Jon Elgas reads proposal
- Jason Brandenburg POI explains "caucuses" being confusing
- Joe Brungardt agrees
- Mike Saliba moves to replace "caucuses" with "organized factions"
- Amendment passes by voice vote
 - Mark King calls division
 - Amendment fails by standing vote
- Scotty Boman moves to strike "by organized party caucuses for fundraising or promotional purposes"
 - Amendment passes
 - Division called: In favor 19, Against...is greater than 19 thus not counted.
 - Amendment fails by standing vote
- **Motion to adopt proposal fails**

- Break for lunch at 12:01 pm

Ron Zimmerman from Rank MI Vote speaks during lunch

Resume convention business

- Mike Saliba calls convention back to order at 1:20 pm
- Larry Johnson provides updated credentials report.
- 71 delegates registered, 50% is 36, and 2/3rds is 48

Announcements

- Already done near end of lunch break

Officer Elections

- Mary Buzuma takes over chairing convention
- Joe Brungardt moves to open nominations for chair
- Passes by voice vote
- Joe Brungardt nominates Mike Saliba. Seconded.
- Jay Gillotte moves to close nominations. Seconded.
- Passes by voice vote
- Mike Saliba accepts nomination for Chair
- Bill Gelineau moves to vote by acclimation. Seconded.
- **Mike Saliba elected Chair by acclimation**
- Mike Saliba speaks after being elected

- Nominations opened for 1st Vice Chair / Affiliates Director
- Bill Gelineau nominates Rafael Wolf
- Larry Johnson nominated Mark King
- Motion to close nominations moved and seconded.
- Bill Gelineau speaks to nomination of Rafael Wolf
- Rafael Wolf speaks to his nomination
- Larry Johnson speaks to nomination of Mark King
- Mark King speaks to his nomination
- Delegates have ballots for 1st VC and begin voting
- Candidate names, including "None of the Above" are listed on the screen
- During balloting...
- Luke Sciberras talks about the Capital Area Libertarian Party and told a bad joke
- Mike Saliba announces Jacon Hornberger will be at the convention after close of business.
- Several other delegates tell bad jokes
- Kyle McCauley speaks about Legal Defense Fund
- Announcement of results of 1st VC
 - o **Rafael Wolf 47 (elected to 1st Vice Chair)**
 - o Mark King 18
 - o None of the Above 1

- Nominations opened for 2nd Vice Chair / Political Director
- Mark King nominated but declines
- Joe Brungardt nominates Greg Stempfle who accepts
- Clar Gelineau nominates Jami Van Alstine but declines
- Motion to vote by acclimation moved and seconded.
- **Greg Stempfle elected 2nd Vice Chair by acclimation**

- Greg Stempfle speaks after being elected
- Nominations for Secretary opened
- Scotty Boman nominates Jami Van Alstine who accepts
- Stephanie Dunnn nominated but declines
- Motion to close nominations moved and seconded
- Brian Ellison moves to vote for Secretary by acclimation. Seconded
- **Jami Van Alstine elected Secretary by acclimation**
- Jami Van Alstine speaks after being elected
- Joe Brungardt speaks about how much Jami does for the party and acknowledges her contribution to the party.
- Nominations opened for Treasurer
- Jason Brandenberg nominates Angela Thornton for Treasurer who accepts
- Motion to close nominations moved and Seconded
- Jami Van Alstine moved to elect Treasurer by acclimation, seconded.
- **Angela Thornton elected Treasurer by acclimation**
- Angela Thornton speaks after being elected
- Joe Brungardt speaks about how Angela stepped up and helped last term when we had no treasurer.

Caucus by Congressional District

- Results by District, each district announces the results of its caucus
 - o 1. No delegates present
 - o 2. Jay Gillotte
 - o 3. Ari Abraham
 - o 4. Andrew Duke
 - o 5. Brian Ellison
 - o 6. Mark King
 - o 7. Lisa Lane Gioia
 - o 8. Adam Childress
 - o 9. Kyle McCauley
 - o 10. ~~Jim Fulmer~~ (Jim realized afterwards he lived in the wrong district)
 - o 11. Joe Brungardt
 - o 12. No delegates present
 - o 13. Gregg Smith

Election of Judicial Committee

2:15 pm

Note: This was originally an agenda item but the bylaws were amended earlier in the day which eliminated the elected Judicial Committee.

- Scotty Boman nominates himself for Judicial Committee
- Brian Ellison points out bylaws amendments take effect immediately thus no Judicial Committee elections will occur.
- Brian Ellison moves to suspend rules to make another proposal to amend the bylaws.

Ellison Bylaws Proposal: New proposal to redefine the LPMs relationship with the National Libertarian Party.

- Proposal strikes the language "~~and affiliating with the National Libertarian Party.~~"

II. PURPOSE

The purpose of this organization is to further the principles of individual liberty as expressed in the Statement of Principles of the National Libertarian Party by nominating and working to elect candidates for political office and by entering into political information activities ~~and affiliating with the National Libertarian Party.~~

- Joe Brungardt speaks in favor of proposal/suspension
- Scotty Boman speaks against
- Bill Gelineu speaks in favor
- Tim O'Brien speaks against
- Kyle McCauley speaks in favor
- Mark King speaks against
- Tullio Proni speaks in favor
- Dave Canny speaks against
- Brian Ellison, with no objections, speaks in favor
- Bill Hall speaks against
- Brandon Warzybok speaks against
- Jon Coon speaks against
- Lisa Gioia POI asks for opinions from lawyers in the delegation
- Mike points out most lawyers have already spoken
- Bill Hall gave his personal, non legal opinion
- Lanie Nix speaks in favor with clarification
 - Amendment And seeking reasonable independent affiliation with the National Libertarian Party
 - Jerry Bloom speaks against
 - Clar Gelineau speaks against
 - Scotty Boman speaks...
 - Max Riekse moves to table proposal, no second
 - Lanie Nix clarification who does LNC recognize
 - Mike Saliba The LNC recognizes the other board chaired by AC
 - Question called on amendment
 - Amendment fails by voice vote
- Bill G moves to table main motion until next convention, seconded
- **Motion to table proposal passes by voice vote**

- Joe Brungardt moves to suspend rules to amend agenda to do platform after resolutions and open floor.
- Question called
- Motion passes by voice vote.
- Greg Stempfle makes a motion to suspend rules to consider final two bylaws proposals in committee report
- Passes by voice vote

Resumption of Bylaws Consideration

2:45 pm

- Jon Elgas takes chair of convention

Proposal 9) Change membership minimums for conventions.

VI. CONVENTIONS

8. A person must be a current member of the Libertarian Party of Michigan in order to serve as a delegate to a state convention. A person who has never been a member of the Libertarian Party of Michigan must become a member at least ~~30~~ 60 days prior to a State convention to be eligible, unless that person was a member of

the National Libertarian Party at least ~~30~~ 60 days prior to a State Convention and becomes a dues paying member of the state party before being eligible ~~allowed~~ to vote at that convention.

- Jon Elgas reads proposal
- Kyle McCauley POI explain eligible vs allowed
- Jerry Bloom moves to amend add “dues paying member of the state party 60 days before” in last sentence
 - Informal discussion
 - Scotty Boman speaks against
 - Joe Brungardt speaks in favor
 - Question called
 - Motion to amend fails
- Brandon Warzybok amendment, insert “now residing in the state of Michigan” after State Convention in last sentence.
 - Bill Hall POI
 - Question called
 - Motion to amend passes
- Amended proposal now reads:

8. A person must be a current member of the Libertarian Party of Michigan in order to serve as a delegate to a state convention. A person who has never been a member of the Libertarian Party of Michigan must become a member at least ~~30~~ 60 days prior to a State convention to be eligible, unless that person was a member of the National Libertarian Party at least ~~30~~ 60 days prior to a State Convention now residing in the state of Michigan, and becomes a dues paying member of the state party before being eligible ~~allowed~~ to vote at that convention.

- **Proposal adopted by voice vote**

Proposal 10) Clarify ending of term

III. OFFICERS

1. The officers of the Party shall be a chair, a first vice chair, a second vice chair, a secretary, a treasurer, and the Congressional district representatives described below, hereinafter referred to as the “Executive Committee.” These are the same individuals who shall serve as the directors of the “Libertarian Party of Michigan Executive Committee, Inc.” None of these offices shall be combined. All of these officers shall be elected to a two-year term at an odd-numbered year regular convention of the Party by the attending delegates (as to the Congressional district representatives, those delegates from the respective districts) and shall take office immediately upon the close of such convention and shall serve until the final adjournment of the next odd-numbered year regular convention or until their successors are elected.

- Jon Elgas reads proposal
- Kyle McCauley POI
- Angela speaks in favor, language requested by parliamentarian Richard Brown
- Tim O’Brian POI
- Joe Brungardt speaks in favor
- Scotty Boman speaks against wording and moves to substitute “or until the seat becomes vacant.” No second.
- Jerry Bloom speaks but not in order
- Brian moves to amend by substitution “or until the seat is vacated in accordance with these bylaws.”
 - Motion to approve amendment passes
- Jerry Bloom moves to amend amendment “or special” after “regular”, seconded
 - Kyle McCauley speaks against
 - Amendment fails by voice vote
- Brian Ellison moves to amend by inserting “Except as provided otherwise in these bylaws” before “All of these officers...”

- o Amendment passes by voice vote
- Amended proposal now reads: {expert}

...Except as provided otherwise in these bylaws, all of these officers shall be elected to a two-year term at an odd-numbered year regular convention of the Party by the attending delegates (as to the Congressional district representatives, those delegates from the respective districts) and shall take office immediately upon the close of such convention and shall serve until the final adjournment of the next odd-numbered year regular convention or until the seat is vacated in accordance with these bylaws.

- **Proposal adopted by voice vote**
- Motion by Luke Sciberras to suspend rules to consider another bylaws proposal
- Motion passes

Luke Sciberras Bylaws Proposal

XII. AMENDMENTS

These bylaws may be amended by a two-thirds vote of the delegates present at a convention occurring ~~in an odd-numbered year only.~~ at any convention.

- Bill Hall speaks against
- Kyle McCauley moves to amend by substitution “or at any special convention called for that purpose”
 - o Scotty Boman speaks against
 - o Larry Johnson speaks in favor
 - o Motion too close to call
 - o Voting by count off; For 35, Against 28
 - o Amendment passes
- Jon Coon motion to amend to add “sole” to read “called for that sole purpose.”
 - o Lanie Nix speaks against
 - o Luke motion to amend amendment replace “sole” with “primary”, Seconded
 - Bill Gelineau speaks against
 - Vote on amendment to amendment, replace with “primary” fails
 - o Vote on amendment to add “sole” fails
- Main motion called
- **Motion fails by voice vote**

Resolutions

3:29 pm

- Resolution introduced by Scotty Boman

“Libertarian Party of Michigan Unity Resolution

Whereas there are two competing groups claiming to be the legitimate Libertarian Executive Committee (LEC) of the Libertarian Party Michigan (LPM) AKA Libertarian Party of Michigan Executive Committee, Inc.; and

Whereas the greatest threats to liberty are outside this Party; and

Whereas the historical practice of the Michigan Secretary of State is to deny ballot access to minor parties that submit competing slates of candidates; and

Whereas the other group, claiming to be the LEC, is likely to schedule another Regular Convention before July 31st; and

Whereas the Convention held in Lansing, Michigan on April 1st 2023 AD is the legitimate LPM Regular Convention; and

Whereas two conventions electing the same officers, passing the same bylaw amendments, and platform amendments will result in a single Libertarian Party of Michigan; now therefore, be it

Resolved, that any person nominated to the LEC, and any delegate attending today, earnestly attempt to participate fully in the other event labeled the LPM regular Convention. In so doing they are urged to vote for the exact same officers, bylaw amendments, and platform amendments, as are passed at the April 1st Regular Convention in Lansing.”

- Moved and seconded
- Bill Gelineau speaks against
- Jon Coon speaks in favor
- Jim Fulner moves to extend time for 15 minutes to 3:52 for resolutions
 - Motion fails by voice vote
- **Vote on resolution fails by voice vote, vote is close but requires 2/3 for passage**

Open floor

3:39 pm

- Resolution introduced by Max Riekse

“Resolved that the Libertarian Party of Michigan go on the record condemning in the strongest possible terms the recently passed unconstitutional anti-gun laws by the Michigan State Legislature; these laws do not give Michigan citizens due process and go against the spirit and meaning of the Second Amendment of the United States Constitution.”

- Moved and seconded
- Max speaks to motion
- **Resolution passes by voice vote**

- Resolution introduced by Jim Fulner

“Whereas the Mises Caucus is ignorant & repugnant;

Whereas we have no reason to believe they are government provocateurs, we aren't sure what they would be doing diffidently if they were;

Whereas Andrew Chatterton is an ugly fucktard who is mad that we took our balls and went home;

Whereas we recognize he felt his rights were violated at the 2022 Party nominating convention;

Whereas we do appreciate him at least having waited until after the 2022 November election to file his complaint with the duly elected LPM Judicial Committee, thereby allowing our candidates to fulfill their mission to promote libertarianism to Michiganders through electoral politics;

Whereas the Judicial Committee, populated with Mises Caucus members who were personal friends with Andrew, delivered a ruling on December 19, 2022 in favor of Mr. Chatterton, not based primarily on the will of the majority of Michigan Libertarians, nor the bylaws those same Libertarians have written, nor judicial precedent, but simply because they like Andrew better, with some members even publicly proclaiming such;

Whereas one of the failures of a Democracy is once someone is elected, they can pretty much do whatever they want as long as they have support of the majority;

Whereas we affirm the long-standing libertarian position that private contracts, whether written or verbal, always take precedent over any state law;

Whereas we acknowledge state laws governing corporations are complete bullshit; &

Therefore, we, the members of the Libertarian Party of Michigan assembled in Lansing on Saturday, April 1, 2023, do recognize the rights of the Judicial Committee to have made a bad faith decision on December 19, 2022. We recognize the events partaking among the members of the Libertarian Party of Michigan assembled in Wixom on Saturday, April 1, 2023, and agree to abide by the results of their assembly. We look forward to beating them in a fair leadership election after their call for a regular convention sometime before August 31, 2023 so that we can ending the cult of personalities, resume promoting the principles of libertarianism, namely individual liberty and personal responsibility, and, hopefully once-and-for-all, put in-fighting behind us so as to put forward the best slate of Libertarians ever presented to Michigan voters in 2024 after-which the events of the last quarter will be but a foot note on a Lpedia site no one reads anyway."

- Moved and seconded
- **Resolution fails by voice vote**

- Mary Buzuma takes gavel
- Motion by Mike Saliba to suspend rules to extend time by 15 minutes to adjourn at 4:15.
- Motion passes
- Resolution introduced by Mike Saliba
"Whereas the petition to remove Andrew Chadderdon is no longer necessary, this body affirms they would have voted to remove him if given the opportunity to do so."
- A standing vote is requested. 58 in favor, 4 against
- **Resolution passes by standing vote**

Platform Consideration

- Jim Fulner takes the gavel as Platform Committee Chair

- **Jim Fulner Proposal 1.** Insert "We condemn bigotry as irrational and repugnant." To the beginning of Article, I Section 6.
 - Jim Fulner introduces motion
 - Dave Canny speaks against
 - Brandon Warzybok speaks in favor
 - Greg Creswell speaks against
 - Tim O'Brien speaks against
 - Kyle McCauley speaks in favor
 - Jon Coon speaks against
 - Question called
 - **Proposal fails by voice vote**

- **Jim Fulner Proposal 2.**
 - Insert "All software purchased or developed by government employees or ran on government machines should be Published under the GNU Public License, or similarly freedom respecting Free Software license." as a new Section 14 to Article I.
 - Jim Fulner reads proposal
 - Scotty Boman moves to amend by inserting "in the performance of their duties,"
 - New language would read "All software purchased or developed by state employees in the performance of their duties, or run on government owned machines, should be published under the GNU Public License, or a similarly freedom respecting Free Software license."

- o Informal discussion
- o Kyle McCauley calls question on amendment
- o Amendment passes by voice vote
- Lanie Nix: POI what is GNU?
- Jim Fulner: GNU is a public license with the ability to look at the source code.
- Bill Hall: clarifies would state be allowed to use Microsoft Office?
- Jim Fulner: suggests no, they would need a different software package
- Question called
- **Proposal adopted by voice vote**

- **Leonard Schwartz Proposal 1**
Delete the entire platform except the current Statement of Principles and Preamble.
- Leonard Schwartz speaks to proposal
- Scotty Boman speaks against
- Question called
- **Proposal fails by voice vote**

- Motion to adjourn at 4:15

Post convention

- Speech by Presidential Candidate Jacob Hornberger
- Meeting of the newly elected Libertarian Executive Committee.

Respectfully submitted,

Greg Stempfle

LPM Convention Secretary

Convention videos for reference:

https://www.youtube.com/playlist?list=PLM5V9L4OYkEc_-61TdRnrgm_Rgn_gTt2Y

Sent: 02/02/2023 8:51 AM EST

Dear Members,

I am sure many of you have become aware of the LPM Executive Committee meeting that took place the evening of January 31, 2023. The reason this meeting took place is because many of the officers elected on July 9, 2022 learned that our party has recently been operating in a manner that is inappropriate given our status as a Michigan Nonprofit Corporation. The resultant actions that took place after the Judicial Committee released its report regarding Mr. Chadderdon's appeal of the July 9 Convention, have been found to be unauthorized, and void.

This obviously lends itself to confusion and difficulty as we navigate through the decisions that must be made to rectify the actions that followed the Judicial Committee's decision.

There are several questions at hand. This letter hopes to address each of those questions.

1. Why were the actions taken by certain members of the Libertarian Party of Michigan following the Judicial Committee decision?

Certainly, many asked the question, "What does the Judicial Committee report mean?" While some took it to mean that the board of the Libertarian Party of Michigan was reverted to its form before the July 9th Convention, there are two main issues with that.

First, the Libertarian Party of Michigan is a membership organization, and it is not possible for a committee to remove a member of its board that was elected by vote of the members. There is no authorization in our bylaws for that. There is no authorization within Robert's Rules of Order to accomplish that. And perhaps most importantly, the Nonprofit Corporation Act 162 of 1982 specifically authorizes only the members to have the authority to remove a member of the board that was elected by the members. The Act does allow bylaws to specify other methods, but our bylaws do not provide authority to any Committee to remove member-elected board members.

Second, the Libertarian Party of Michigan has never authorized the Judicial Committee or any other committee to overrule the actions of its members as represented by its delegates at convention. The members of this party have the ultimate authority, and that authority is vested in its delegates to all Conventions of the Libertarian Party of Michigan.

Therefore, we are now taking actions to rectify the inappropriate, and unauthorized actions of certain members that took place following the Judicial Committee report.

2. What was the appropriate action following the Judicial Committee report?

What should have occurred, following the Judicial Committee report, would have been for the Executive Committee to call a Special Convention, for the purpose of allowing the members to act on the Judicial Committee report. Given the confusion surrounding the Judicial Committee's report, we did not call an Executive Committee meeting to take this action because unfortunately, we didn't properly understand our responsibilities. After seeking legal counsel,

and the advice of many long-standing members in the party to understand further the precedence, we now understand what the appropriate action would have been.

3. What is the impact of the Judicial Committee report?

The impact of the Judicial Committee report is to offer guidance to the Executive Committee and members on how to proceed to better align with the bylaws of the Libertarian Party of Michigan per their interpretation and reporting on specific cases.

Since the Judicial Committee report ruled that the bylaws were violated at the convention in July, it would be incumbent upon the Executive Committee to seek the rectify such violations in a manner that preserves the integrity of the party, allows the members to assert their rights, and maintains the appropriate functioning of the party until any bylaw violations can be appropriately rectified.

However, the Judicial Committee has no authority to overrule the delegates of a convention body. Therefore, should the Executive Committee believe that the Judicial Committee is overstepping its authority, it is incumbent upon the Executive Committee to assert the rights of its members in opposition to the Judicial Committee if necessary.

4. What proof do you have that this is the legally correct action of the party?

In addition to being the state affiliate of the Libertarian Party in Michigan, the LPM is also incorporated as a Nonprofit Corporation in the State of Michigan and is bound by the laws governing such organizations. The members of the LPM Executive Committee are legally the directors of the corporation. Only the directors of the corporation can act on behalf of the corporation. Members of the Judicial Committee are not directors of the corporation.

According to the Michigan NONPROFIT CORPORATION ACT 162 of 1982, the Judicial Committee does not have the authority to remove an officer elected by the members of the organization.

450.2535 Removal of officer; suspension of authority to act; contract rights; resignation of officer; notice. Sec. 535. (1) An officer elected or appointed by the board may be removed by the board with or without cause. An officer elected by the shareholders or members may be removed, with or without cause, only by vote of the shareholders or members. The authority of the officer to act as an officer may be suspended by the board for cause.

5. How do we move forward as a party to a unite and fight for liberty in our lifetime?

The Executive Committee has, as prescribed in our bylaws, authorized and issued a Call to our Regular Convention for April 1, 2023 at the Hilton Garden Inn at 633 North Canal Road in Lansing, MI for party members to elect all officers and choose the party's direction. A call was sent for volunteers for a bylaws committee that will address issues in our bylaws that have left the LPM open to the conflicts that we have seen over the past several months. The LPM is

committed to fully supporting the efforts underway by several dedicated volunteers targeting opportunities and recruiting Libertarian candidates to win local elections in 2023.

We request that all parties respect the right and authority of the members of the LPM to proceed with the convention on April 1 in Lansing to decide on the leadership and the business of the party.

6. Who are the members of the Libertarian Party of Michigan Executive Committee?

Chair – Joe Brungardt

First Vice Chair – Mike Saliba

Second Vice Chair – Mary Buzuma

Secretary – Daniel Ziemba

Treasurer – Vacant

District 1 – Ryan Roberts

District 2 – Vacant

District 3 – Jordan Martin

District 4 – Rick Thelen

District 5 – Dave Canny

District 6 – Rafael Wolf

District 7 – Brian Ellison

District 8 – Jon Elgas

District 9 – Greg Stempfle

District 10 – Kyle McCauley

District 11 – Bruce Jaquays

District 12 – Daniel Muehl-Miller

District 13 – Jami Van Alstine

District 14 – Scotty Boman

7. If I have concerns, who should I speak with?

If you have concerns, I encourage you to speak with your District Representative. You are certainly welcome to reach out to any member of the board, but your District Representative is responsible for taking up your concerns and speaking on your behalf to the board at any of its meetings.

Thank you for being a member of the Libertarian Party of Michigan. And look to upcoming announcements and information as it relates to the discoveries outlined here, and the appropriate actions to be taken looking forward.

Sincerely,

Joe Brungardt

Chair

Libertarian Party of Michigan

Official communication from the Libertarian Party of Michigan

Good afternoon ,

There are several district seat vacancies on the LEC which need to be filled. The LEC is hosting a [Zoom](#) meeting on April 30th at 1:00 PM for Districts 1, 8, 10, and 12 to caucus and select a nominee to fill the vacancy. If you reside in any of those districts, please plan on attending. The LEC will appoint the district's nominee at the May 19th regular meeting.

There are several committees and positions that need to be filled. If you are interested in volunteering for any of the following committees or positions, please email your interest to chair@michiganlp.net and secretary@michiganlp.net.

- Historical Committee
- Newsletter Editor
- Legislative Committee
- Membership Committee
- Campaign Support Committee
- IT Support Committee
- Affiliate Outreach Committee
- IT Director

The Libertarian Party of Michigan had another well attended and succesful special convention on April 1st in Lansing! Even with the divide in the party, we had *over* 75 attendees and two guest speakers. We had long-time party members and activists, and new members attending their first state convention.. Members elected their officers, updated the bylaws, and the platform. We are all fired up and excited for the months ahead!

Officers elected at convention in Lansing, April, 2023:

Chair - Mike Saliba
1st VC - Rafael Wolf
2nd VC - Greg Stempfle
Secretary - Jami Van Alstine
Treasurer - Angela Thornton

District Reps

1. Vacant
2. Jay Gillotte
3. Ari Abraham
4. Andrew Duke
5. Brian Ellison
6. Mark King
7. Lisa Lane Gioia
8. Vacated
9. Kyle McCauley
10. Vacant
11. Joe Brungardt
12. Vacant
13. Gregg Smith

The video from the Lansing convention has been published and can be viewed [here](#).

The bylaws and platform as amended on April 1st, 2023 have been published and are available on our [website](#) under About.

Kind regards,

Jami Van Alstine

Secretary, Libertarian Party of Michigan (pronouns unnecessary)

[Unsubscribe](#)

PO Box 614

Royal Oak, MI 48068

United States

Official communication from the Libertarian Party of Michigan

An update from the chair of the Libertarian Party of Michigan, Mike Saliba

Dear ,

A lot has happened since I last updated you via E-mail and at the convention in Lansing about another group claiming to be the LPM. Here is a status update on the some of the topics related to the dispute to help clear up any confusion created by the other group.

Did we lose the bank account?

Last month Andrew Chadderdon, who leads the group which has stolen party assets and claims to be the LPM in collusion with the national party, sent out an email claiming that his group was now in control of the bank accounts which make up the LPM treasury. This is NOT TRUE. The Chadderdon group did attempt to steal the treasury and were issued checks by Comerica Bank, where the money was held. Comerica quickly put a stop payment on those checks when they realized their mistake. We will now be going to court with Comerica and Chadderdon to win back those funds. That case was filed April 28th.

Are we being sued by National?

The LNC voted in March to allocate \$10,000 to take legal action against us. In April they voted to allocate \$2,000 more. That is money you have donated to help the party fight against the state and now being used to fight against you and the votes you have cast at two consecutive conventions. The basis for the lawsuit is our use of the words "Libertarian" and "Party" in our name. This is ridiculous for a few reasons. First, The Libertarian Party of Michigan had been using those words in our name for decades prior to the national trademark filing. Second, the Republicans and Democrats don't even have trademarks on their names because it's so unenforceable to have a trademark that broad. Third, we aren't claiming to be the national party, so the national party has no business suing us for any trademark violation. Here in Metro Detroit, we have a ton of Coney Island restaurants. The original was Lafayette Coney Island. After a dispute between the owners, it got split down the middle to form American Coney Island. The big chains are National Coney Island, Leo's Coney Island, Kerby's Coney Island. There's even a ton of independently own mom & pops like Tina's Coney Island or Jon's Coney Island. All of these places use the same two words, "Coney" and "Island" in their names and none of them get sued by the other. Because those aren't the only two words in their name and it's what they are. They're Coney Island style restaurants and the rest of their name tells you which Coney Island restaurant it is. So I can open Mike's Coney Island and not get sued by National Coney Island because I never said I was National Coney Island and I make that clear with the word "Mike's" in the name. Our name is the Libertarian Party of Michigan. A "Libertarian Party" is what we are and the "Michigan" in our name lets you know which Libertarian Party we are (the one in Michigan). This case against us is one we are sure to win and a complete waste of YOUR MONEY by the LNC.

Why didn't we appeal to the National Judicial Committee?

National Secretary Caryn Ann Harlos, being part of the cabal within the national party that supports the Chadderdon group, has made a number of videos and comments on what's happening here in Michigan. One thing she brings up quite a bit was her offer to me to have these matters settled by the National Judicial Committee and my failure to file such a complaint. The reason why we haven't done this is because this isn't an issue with the national party or party matters. The assets of LPM are held by the Libertarian Party of Michigan Executive Committee, Inc which is a non-profit corporation registered in the State of Michigan.

Andrew Chadderdon stole and attempted to steal those assets. The national party is not a law enforcement agency equipped to deal with theft of property or corporate law in the State of Michigan. If Andrew Chadderdon stole my car, I wouldn't file with the JC. That's not what the JC is for.

Did West Michigan and Genesee get disaffiliated?

No! The Libertarian Party of Michigan has not disaffiliated any local affiliates. The Chadderdon group that is in control of our stolen digital assets (our email, website, and social media accounts) sent out that email. They saw how those particular affiliates were able to mobilize members and funds for our April 1st convention in Lansing. They also saw the failure of their own attempt to mobilize members and funds at their pizza party held in Wixom on April 1st. They realize their cabal will never have the support of the majority of members, so they are attempting to shrink the party down to only the people that do support them. Andrew Chadderdon would burn the LPM to the ground if he could be Chair of the assets. The real LPM isn't engaged in any of this nonsense.

I hope this answers the most common questions members have had for the last month or so as to the status of the party. Please email any other questions you may have to Chair@MichiganLP.net. I will answer them personally and include the most frequent questions in my next monthly update. If you happen to be unaware of the events that brought us to this point, I will also attach the last email I sent out.

Please consider donating to our legal defense fund. We have not used any other party funds to fight these court cases and funds are needed.

<https://secure.anedot.com/libertarian-party-of-genesee-county/212de0d6-9ea1-4dbc-bc4a-61e946e4a865>

In Liberty,
Mike Saliba,
Chair, Libertarian Party of Michigan

[Unsubscribe](#)

PO Box 614
Royal Oak, MI 48068
United States

Official communication from the Libertarian Party of Michigan

Fellow Michigan Libertarian,

You may have recently received an email with a call to convention for July. You may ignore this. The Libertarian Party of Michigan already had its odd year regular convention on April 1st in Lansing. At that convention we elected a new LEC to a new 2 year term, we voted for bylaws and platform planks, and we heard from presidential hopeful, Jacob Hornberger.

If you missed it, it's available to watch on YouTube at https://youtu.be/VrKwPY1_pog

The call to convention you received is from the rogue group that has stolen our digital assets (our website, our email address, and our social media accounts) and have attempted to steal our treasury. So while this call to convention may be coming from previously legitimate sources, this is not a legitimate convention.

The convention already held on April 1st in Lansing had the support of all previous candidates for Governor, Lt. Governor, and Secretary of State, the support of previous Chairs and other officers, the support of elected officials and past candidates, and the support of several party founders. The event that is to take place in July has no such support at all.

I understand this turmoil and division can be upsetting, confusing, and frustrating to you. As a dues paying member of the LPM you don't deserve to be put though this. Luckily an end is in sight. I am pleased to share some good news regarding the Party's ongoing governance dispute. Our attorney recently agreed to represent the Party on a contingency basis in a lawsuit to determine entitlement to the funds in the Party's bank account with Comerica Bank. This means that we will not be responsible for legal fees unless we are successful in the case, which involves both the bank and the rogue board led by Andrew Chadderdon. This is good news for two reasons.

First, it is a clear indication of our attorney's confidence in our legal position. The firm would not agree to a contingency fee arrangement if it did not believe we had a strong case. This gives us a significant advantage as we move forward with our litigation.

Second, the fact that we will not be responsible for legal fees if we are unsuccessful is a significant relief. This arrangement allows us to pursue our legal rights without worrying about the financial burden of legal fees pertaining to this portion of the dispute. It further allows funds that have been donated to the legal effort to be reserved for other issues, such as the defense of trademark lawsuits or other legal actions that may be filed in the future. Our hope is that this will give us the ability to continue the fight for as long as needed to prevail and restore order to the Party.

I thank you for continuing to stand by us while we work through these issues.

In Liberty,
Mike Saliba,
Chair, Libertarian Party of Michigan

[Unsubscribe](#)

PO Box 614

Royal Oak, MI 48068

United States

Official communication from the Libertarian Party of Michigan



Dear ,

“We prefer to work with [the Republican Party], and not against [them]” said the Libertarian Party of Colorado (LPCO), in a letter recently published by the Colorado Republican Party. The letter, which can be seen [here](#), was blatantly offering to support Republican candidates. ***“If the Republican party runs candidates who support individual liberties, we will not run competing candidates in those races,”*** said the statement signed by the Chair and Vice Chair of the LPCO.

What does this have to do with the Libertarian Party of Michigan (LPM)? The situation in Colorado is simply the first publicly disclosed agreement to conspire with other political parties in such an overt manner. The idea of capitulating to the GOP, or any political party, is the biggest threat that the takeover interlopers have leveled against the Libertarian Party. If the LPM does not stand up against the minority element of the LPM constituting the ***Chadderdon Organization Party (COP)***, we can expect a similar scenario to play out here.



As most of you know, the LNC, acting as a proxy for the COP, has filed a [trademark lawsuit](#) against several members of the LPM Executive Committee. A recent [motion](#) of theirs was rejected by the court for missing substantive content and lack of form. They were also [ordered](#) to comply with the local counsel requirement, meaning they would have to retain a new attorney. In response to the rejection, the attorney for the LNC sent a “settlement offer” to the LPM counsel demanding full capitulation to the LNC.

In a recent email to members, former LNC member and former LPM Communications Director Connor Nepomuceno (who is currently representing the COP and holding original LPM digital assets hostage) told members, ***“the LPM Executive Committee has approved treating donations to the National Libertarian Party's Legal Defense Fund as membership dues,”*** because they are ***“[unable] to accept donations, process new memberships, and facilitate renewals”*** as the LPM.

This is an attempt to siphon funds from the members of the LPM and redirect them to the organization that has filed a federal lawsuit against current and past leaders of the LPM, including 2022 candidate for Governor Mary Buzuma and 2022 candidate for Secretary of State Greg Stempfle. Like Colorado, the COP, in collusion with the LNC, is seeking to

destroy the LPM as we know it.

We are faced with an unprecedented situation where our party is being threatened with complete irrelevance from within, under the incompetent central management of the LNC and the Mises PAC sponsored COP.

The LPM is taking a stand against the LNC and their subservient COP. This assertion of our autonomy as an affiliate will have ripples through the entire national party. We have the authoritarians of the LNC on the ropes, but we need YOUR support!

Liberate Michigan by donating to the [LPM Legal Defense fund](#) today!

In Liberty,
Mike Saliba,
Chair, Libertarian Party of Michigan

and
Brian Ellison,
Chair, LPM Fundraising Committee

[Unsubscribe](#)

PO Box 614
Royal Oak, MI 48068
United States

Subject: Re: LNC v Saliba et al.
Date: Monday, June 12, 2023 at 6:09:14 PM Eastern Daylight Time
From: Joseph Zito
To: Nick Curcio
CC: Clifford D. Hyra
Attachments: image001.png, DRAFT joint Submission Stip and Judgement.pdf

Nick:

Defendants were given multiple opportunities to resolve these issues within the rules of the Party before getting to this point. These issues were decided by their own Judicial Committee mid-December 2022. The Defendants petitioned for a special convention that would have voted on business that would effectively overturn the Judicial Committee decision that they did not like. That convention was set for April 1, 2023. Several of the defendants were involved in the site planning and setting. At the end of January 2023, Defendants instead formed their own rogue board and decided they could unilaterally ignore the Judicial Committee's decision made under their own bylaws and set a competing illegitimate convention for April 1, 2023.

During this period of time, they were urged to just to go the April 1, 2023, convention and win the positions they wanted under the Party rules if they had the votes and support to do so. If they did not win, that is just how politics go. The Defendants realized that the LNC did not recognize their rogue board and if they believed that decision was in error as a "constructive disaffiliation" (a cause which has been recognized in the Party for well over a decade), they could have appealed to the national Judicial Committee. The latest date for their automatic appeal was March 18, 2023. They chose not to.

All throughout this time, they had ample opportunity to resolve and were urged to. Secretary Harlos personally wrote Mr. Saliba to advise him of his appeal rights under the national Bylaws.

We have provided the terms necessary for settlement without the LNC seeking any damages against the Defendants. SEE ATTACHED If this case continues, the LNC will seek damages. This is a limited time "walk away" offer which will have to be approved by a vote of the LNC if the Defendants wish to accept. My client has instructed me to inform you that the Defendants can always re-integrate into the recognized Michigan affiliate and try to win the proper way, within the rules, at properly called conventions. Or they can start a competing political party not using the LNC's trademarks.

Altering the above is not possible because compromising member rights is not in the power of the LNC or the LPM. The LNC also cannot violate its bylaws or risk its ballot access for Michigan or other states through a waterfall effect without potentially violating its fiduciary duty to its membership.

It is understood that the Defendants think these issues will be decided by the Comerica suit. That case will have no authority to tell the LNC who can use its trademarks or to identify its affiliate. It can merely decide who is entitled under a very limited scope of an agreement with a banking institution to deposits. It cannot adjudicate bylaws violations or internal party disputes over Party leadership - that is internal and resolved. It cannot decide who is entitled to the name - only the funds. The LNC has already recognized the Chadderdon board and to "unrecognize" them would require active or constructive disaffiliation (active disaffiliation of the Chadderdon board would require a 2/3 vote of the entire LNC which is extraordinarily unlikely), and there is no guarantee that considering the atrocious behavior of the Defendants that the LNC would recognize them instead, but

would have the option of simply disaffiliating everyone--thus the trademark issue remains as the LNC would start a new affiliate who would then be entitled to use the LNC's trademarks. Thus, the Comerica case has little to no bearing on these issues.

It is also understood through public posts of Mr. Saliba that he believes that they have ballot access. Defendants do not.

Joseph J. Zito
STEIN IP
Direct Dial 202-466-3500



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 2023

VIA EMAIL

angelat0763@gmail.com
swmi4liberty@be-innovative.net

Angela Thorton
15223 Ripple Dr.
Linden MI, 48451

RE: MUR 8130

Dear Ms.Thorton:

The Federal Election Commission (FEC) received a complaint that indicates you may have violated the Federal Election Campaign Act of 1971, as amended (the “Act”). A copy of the complaint is enclosed. We have numbered this matter MUR 8130. Please refer to this number in all future correspondence.

The Act affords you the opportunity to demonstrate in writing that no action should be taken against you in this matter. If you wish to file a response, you may submit any factual or legal materials that you believe are relevant to the Commission’s consideration of this matter. Where appropriate, statements should be submitted under oath by persons with relevant knowledge. Your response, which should be addressed to the General Counsel’s Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and § 30109(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. Please be advised that, although the Commission cannot disclose information regarding an investigation to the public, it may share any information you provide with other law enforcement agencies, including the Department of Justice.¹ While the matter remains open, it will remain confidential as set forth above. After the matter is closed, certain documents from the file will be made available to the public on the Commission’s website. To learn more about the agency’s disclosure policy, please see 81 Fed. Reg. 51, 702 (Aug. 2, 2016), <https://fec.gov/resources/cms-content/documents/notice2016-06.pdf>.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission. Please note that you have a legal obligation to preserve all documents,

¹ The Commission has the statutory authority to refer knowing and willful violations of the Act to the Department of Justice for potential criminal prosecution, 52 U.S.C. § 30109(a)(5)(C), and to report information regarding violations of law not within its jurisdiction to appropriate law enforcement authorities. *Id.* § 30107(a)(9).

records, and materials relating to the subject matter of the complaint until such time as you are notified that the Commission has closed its file in this matter. *See* 18 U.S.C. § 1519.

Any correspondence sent to the Commission, such as a response, must be addressed to **one** of the following (note, if submitting via email this Office will provide an electronic receipt by email):

Mail
Federal Election Commission
Office of Complaints Examination
& Legal Administration
Attn: Trace Keeys, Paralegal
1050 First Street, NE
Washington, DC 20463

OR

Email
cela@fec.gov

As indicated in the FEC's Notice found at <https://www.fec.gov/legal-resources/enforcement/complaints-process/how-to-file-complaint-with-fec/>, the FEC has largely resumed normal mail operations, but please be advised that processing paper correspondence may be delayed. Accordingly, we strongly encourage you to file responses and additional correspondence via email.

If you have any questions, please contact Trace Keeys at (202) 694-1260. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Wanda D. Brown
Acting Assistant General Counsel
Complaints Examination &
Legal Administration

Enclosures:

1. Complaint
2. Procedures
3. Designation of Counsel



T LIBERTARIAN
Minimum Government Maximum Freedom

RECEIVED
FEDERAL ELECTION COMMISSION
APRIL 19, 2023 2:02 PM
OFFICE OF GENERAL COUNSEL

April 18, 2023

VIA EMAIL, REGULAR MAIL, AND CERTIFIED MAIL RETURN RECEIPT REQUESTED

Federal Election Commission
1050 First Street, NE
Washington, DC 20463
Email: EnfComplaint@fec.gov

MUR 8130

Re: Violation Under 52 U.S.C. §30109

Dear Sir/Madam:

I am writing as National Chair of the national Libertarian Party ("NLP") regarding a complaint of a violation under 52 U.S.C. §30109. The attached Amended Statements of Organization for the Libertarian Party of Michigan Executive Committee, Inc. dated February 5, 2023, and March 19, 2023, (*attached hereto as composite Exhibit A*), filed and certified by Angela Canny are knowingly and demonstrably false.

PERTINENT FACTS

The Libertarian Party of Michigan Executive Committee, Inc. is the governing body of the Libertarian Party of Michigan, a chartered state-level affiliate party of the NLP (collectively "LPMI"). The Commission issued Advisory Opinion 2016-7 (*attached hereto as Exhibit B*), concluding that this Committee qualifies as a state committee of a national political party.

In early February 2023, a group of persons started fraudulently representing themselves to be the valid leadership of LPMI, including Angela Canny. On February 16, 2023, the NLP sent a cease and desist letter to the persons making this illegitimate claim making it clear that they did not represent the chartered state-level affiliate, and identifying the actual recognized affiliate as chaired by Andrew Chadderdon (*see letter attached hereto as Exhibit C*). Also, on February 15, 2023, an attorney for the legitimate leadership of LPMI also sent a cease and desist to the non-recognized group (*see letter attached hereto as Exhibit D*). The illegitimate group had appeal rights under the NLP which they failed to exercise by the deadline of March 18, 2023, and in fact filed one of the false Amended Statement of Organizations after that fact.

The NLP would also note that the false paperwork indicates that the website of the organization is michiganlp.net. On the official website of the NLP (*see <https://www.lp.org/state-affiliates/>*) the website of the recognized chartered state level affiliate is listed correctly as michiganlp.org.

FEC
4/18/23
Page 2 of 2

CLAIMED VIOLATIONS


As stated in its Advisory Opinion 2016-7, one of the prongs in determining qualifications of a state committee of a national political party is whether or not the state party organization is part of the official structure of a national party. While there does exist a valid chartered state-level affiliation in Michigan with Andrew Chadderdon as its Chair and Greg Black as its treasurer, Angela Canny is not the treasurer or authorized representative of that organization with any authority to file documents on its behalf.

The illegitimate group has been actively fundraising using this impersonation, including potentially for federal candidates. Further, the money is not being deposited under own name, but under that of yet another group and in a different account than that identified in the filings.

REQUESTED RELIEF

The actions of Angela Canny have been done in complete knowledge of these facts and in bad faith. The NLP requests these false documents be stricken and appropriate fines be levied and any other such relief that the Commission deems is appropriate.

We note that Greg Black is the newly elected Treasurer of the recognized affiliate but has not yet filed this change with the Commission due to these false filings and is awaiting guidance from the Commission via this Complaint.



Angela McArdle, Libertarian Party National Chair
7200 Thannas Way
Austin TX 78744

State of Texas

County of Harris

Sworn to and signed before me on the 18th day of April, 2023, by

Angela McArdle (name of principal signer).



(seal) Notary Public Signature



Libertarian Party Is Fighting a Civil War Over Its Right-Wing Mises Caucus

Kelly Weill

As a third-party candidate, Joe Evans' U.S. congressional chances were always slim. Cheerfully identifying as "bordering on anarchist," Evans was a frequent Libertarian candidate for a reliably Republican seat in Idaho. Undeterred, Evans ran three campaigns before suddenly withdrawing his candidacy this summer.

It wasn't Republicans who finally frustrated his efforts, he says—it was his own Libertarian party.

Advertisement

Across the country, aspiring Libertarian activists and entire state-level Libertarian parties are voluntarily quitting. On the same day in August, New Mexico's Libertarian Party filed to disaffiliate from the national Libertarian Party (LP), and the Libertarian Party of Virginia filed to dissolve. Fed-up Libertarians have formed splinter groups in Pennsylvania and New Hampshire. And in Evans' state of Idaho, a contentious set of legal battles have drawn an iron curtain through the local Libertarian party, leaving Evans and other longtime associates on the outs.



At the center of the shakeup is a brash political action committee: the Mises Caucus. In the few years since its 2017 founding, this socially conservative group has swept state and national Libertarian organizations, [officially taking control](#) of the LP at the party's convention this May. Mises Caucus supporters say the group is rebooting America's third-largest political party. Critics say the caucus promotes bigotry, helps Republicans, and is driving everyone but Mises acolytes out of the organization.

The situation "basically reached a point where I could no longer maintain their hostility, their control over party media in messaging while still maintaining the platform and beliefs that brought me into the Libertarian Party," Evans told The Daily Beast.

"I want no part in advocating for secession or alt-right agendas."

Mises Caucus founder and chair Michael Heise denied that a widespread rift had formed in the party.

“A handful of sore losers on their way out is not a ‘schism,’” Heise said in an email, “it’s a few haters in a few states, in contravention of their respective memberships, attempting to destroy the LP now that they no longer control it. The incidents in states such as New Hampshire, Delaware, Wyoming, Vermont, Massachusetts, Idaho, Michigan, New Mexico, and Virginia have all involved people in positions of leadership violating their fiduciary responsibility to the members of those affiliates by performing actions that violate parliamentary procedure, party bylaws, and possibly even state law.”

A National Divorce

Running against opponents from larger, better-funded parties, Libertarian political candidates are frequently provocative. In a now-infamous moment from the party’s 2016 presidential primary debate, most candidates argued against state-issued driver’s licenses. “What’s next, requiring a license to make toast in your own damn toaster?” [candidate Darryl Perry asked](#), prompting applause from the audience.

But until recently, despite the party’s bombast, moderate voices often floated to the top of Libertarian politics. Former New Mexico Gov. Gary Johnson became the 2016 Libertarian nominee, even though he earned loud boos from the debate crowd when he equivocated that “I’d like to see some competency exhibited by people before they drive.”

The Mises Caucus (MC) takes the opposite tack, leaning into provocation.

The caucus has [come out in support](#) of “national divorce,” the notion of breaking the U.S. into multiple smaller nations. The theory is [controversial among libertarians](#), as are recent tweets from Mises-led state Libertarian parties. The MC-led Libertarian Party of New Hampshire, for instance, has [repeatedly called](#) for repealing the Civil Rights Act, [and tweeted](#) “6 million dollar minimum wage or you’re antisemitic,” in reference to the Holocaust. [A recent tweet](#) by the national party, called for the immediate firing and prosecution of educators who teach “queer theory or critical race theory.”

A Southern Poverty Law Center report found far-right ties at the top of MC leadership.



Tom Woods, a member of the MC’s advisory board, is a co-founder of the neo-Confederate group League of the South (he says he left the group before it got racist), while fellow advisory board

member Dave Smith has hosted white supremacists on his podcast. Though some of those appearances were ostensibly for debate, Smith told one such neo-Nazi that he was “sympathetic to the alt-right to a large degree” although he objected to alt-right tactics, [the SPLC reported](#). This year, Pennsylvania’s Libertarian Party nominated a gubernatorial candidate who in addition to being a convicted sex offender also helped Rudy Giuliani stage a bizarre Stop The Steal event [outside a Philly landscaping business](#).

Heisse has also posted about his desire to draft former Overstock CEO Patrick Byrne as a Libertarian candidate. On Facebook, he wrote that Byrne contributed \$5,000 to the MC when it first launched as a PAC. Byrne, who has since become a central player in efforts to overturn the 2020 election in Donald Trump’s favor, did not return a request for comment.

Holly Ward, head of the recently dissolved Libertarian Party of Virginia, said the messaging from MC leadership was the “nail in the coffin” for some longtime libertarians.

“It’s the most un-libertarian messaging that’s coming out of national,” Ward told The Daily Beast. “I want no part in advocating for secession or alt-right agendas.”

Heise, the MC chair, denied that the caucus was bigoted. “Our detractors are apparently trying to comfort themselves by believing they have spent the last five years antagonizing—and then running a failed rearguard action against—‘alt-right bigots,’” he said. “Instead they were simply out-organized by other libertarians who intend to finally make the LP an effective force in American politics.”

“I don’t want to be around this, and I certainly don’t want my five-year-old getting caught up in the middle of it.”

Rob Cowburn, chair of the MC-led Libertarian Party of Pennsylvania, argued that the MC wasn’t really moving the party rightward—it was just opening the door to people on the right.

“I think the only thing that it did is stop ostracizing people who are on the right, who would be with us otherwise, but except for a few of these [party] planks that are completely left and exclude people who are major issue voters on things like abortion,” Cowburn told The Daily Beast. “These people who would be with Libertarians, it just opened the door for them to be able to combine with us on the rest of the issues and leave abortion up to each Libertarian to choose for themselves.”

But Ward is far from the only Libertarian parting ways with the party after the MC assumed majority control in May.

Even Perry, the candidate who once compared a car to a toaster, branded the MC as so extreme that he’s stepping away from active involvement in the LP. “I can no longer in good conscience actively participate in a political organization that doesn’t respect its dissenting members, and provides safe harbor to bullies and bigots,” [he wrote](#) in a blog post this spring.

‘Like A Light Switch’

Many critics of the MC say their conflict is relatively new. Jennifer Imhoff, who until this year chaired the Libertarian Party of Idaho, said she had few ideological differences from MC supporters, and until recently “we were very personable; more than cordial, it was like a friendship.”

The MC “grew out of the 2016 election cycle with Gary Johnson and [running mate] Bill Weld,” Chris Luchini, chair of the Libertarian Party of New Mexico said. Critics within the LP viewed Johnson—and especially Weld—as too aligned with Democrats, too distracted by social issues.

For a time, Luchini agreed. When the MC launched in 2017, with an emphasis on small government and conservative economics, he was attracted to its mission. But he and Imhoff, who also agreed with the MC on some early economic platforms, said the caucus’ tactics soon shifted.

“It morphed,” Luchini said. “The original statements that were used to found the Mises Caucus, are a dead letter. They don’t really matter [...] It’s turned into some kind of weird hybrid monster that I don’t quite have my brain wrapped around. Is it alt-right? Well there’s certainly a lot of that kind of language and symbology being used.”

“A handful of sore losers on their way out is not a ‘schism’.”

For Imhoff and her husband, who is also involved in Idaho Libertarian politics, some of the change came suddenly. Friendships with MC associates were suddenly severed, she alleges.

“One day it was just a light switch that went off. Suddenly anyone associated with Mises did not like us, and they didn’t like anyone who wasn’t part of their organization,” she said.

The strongest sign that the Imhoffs were on the outs was an internal email circulated among Mises supporters in Idaho. The email, written by the head of the MC’s Idaho effort, decried the Imhoffs as “fans” of an anti-MC Libertarian leader, and alleged that the couple had committed a felony leading to their expulsion from the California Libertarian Party. The email noted that the California party had even commissioned a review that “upheld [the Imhoffs’ bad standing with the California LP]” and that “anyone who wants to rummage through California meeting minutes” could verify the MC’s version of events.



The Daily Beast *did* rummage through the meeting minutes. Rather than indict the Imhoffs, the

review concludes that the Imhoffs' suspension (over inaccurate party registration numbers) was unwarranted. The couple has not been charged with a crime and is now suing the MC and the local leader for defamation. Reached for comment, the MC referred to their lawyer in the case, who said the suit is frivolous and that they are fighting it. The case is scheduled for court next spring.

The letter was the first of a series of battles over Imhoff's Idaho Libertarian party.

In April, a slate of MC candidates ran for statewide party office. Idaho election law requires political parties to hold elections for local officials called precinct committeemen, who need at least five votes to win office. By their own admission, the Idaho LP seldom used this system; precincts are small, often the size of a neighborhood, "so most Libertarians wouldn't even be able to get elected because they don't have five Libertarian neighbors," Imhoff said. "So we've just sort of excluded this from our system."

The new MC candidates didn't follow the same playbook. Five ran uncontested races for precinct committeeman. All five declared themselves holders of county or state offices in the party. Imhoff and Evans' wing of the party objected, arguing that Idaho Libertarians had never used the precinct model.

But the law—and the MC-led national party—was on the new candidates' side. The national party took the dispute to Idaho's Secretary of State, who confirmed that the new guard were rightful office holders. Now in legal control of the party, the MC-aligned group replaced Imhoff as chair.

Evans, the former Libertarian congressional candidate, said the new leadership made it impossible to continue running on the party line.

"They started being abusive, they initiated claims against people that were unfounded," Evans said.

Evans, who disagrees with conservative MC supporters on issues like abortion, withdrew his congressional candidacy this summer.

Neither the current Idaho party leadership, nor its lone member of the state Central Committee returned requests for comment.

Going National

The Idaho LP's constitutional crisis kicked off in April. By May, the MC had scored an even larger win nationally. At the LP national convention that month, the caucus swept party elections, landing its candidates in top offices.

An internal MC guide to the convention reveals a detailed strategy for the event, including the caucus' plans to edit the official Libertarian Party platform to remove explicit support for abortion and nix the line "we condemn bigotry as irrational and repugnant."

The document also included strategies to counter challenges from seven different state parties "due to

protracted intra-party conflicts in those states,” as well as a plan to hold a new convention in a parking lot “if something dramatic happens” and security made everyone leave the convention.

Already, those intra-party conflicts had prompted some anti-MC delegates to stay home. Will McVay, former chair of Delaware’s Libertarian Party, said his state underwent an Idaho-style split, during which [the national party sided with the MC faction](#). McVay doubted his faction would even be allowed to vote at the convention.

“So rather than spend the time, energy, and money to go out and fight a losing fight to be associated with the dumpster fire they were creating,” he said. “We just didn’t go.”



McVay had another reason for sitting it out. In past years, he usually brought his young daughter to conventions. But after watching a rowdy recent convention in Pennsylvania, complete with a physical scuffle over a microphone, “I was just like, ‘I don’t want to be around this, and I certainly don’t want my 5-year-old getting caught up in the middle of it.’”

Pennsylvania has proved a particularly dramatic battleground for competing Libertarian factions. The state party’s bylaws allow out-of-state Libertarians to participate in its conventions—a quirk that both MC and anti-MC Libertarians have exploited in recent years.

“Our opposition used large numbers of legal out-of-state members to prevent a Mises Caucus victory in 2021, then covered it up by illegally failing to publish a credentials report and convention minutes,” Heise, the MC chair, alleged. “In 2022 we routed them 3:1 using their own tactics against them, then closed the out-of-state voting loophole for good with a bylaws change.”

“They were simply out-organized by other libertarians who intend to finally make the LP an effective force in American politics.”

Kevin Gaughen, a former Libertarian Party of Pennsylvania executive director, accused the MC of foul play in turn, claiming MC affiliates packed the vote by purchasing Libertarian Party memberships en masse.

“As the executive director at the the time, I could see exactly who paid for the memberships because we could see the last four digits of the credit card and the address, all that,” Gaughen told The Daily Beast, accusing one MC-affiliated member of buying at least 10 memberships.

“Other people were doing the same thing. They were buying memberships for people. We would call these people to thank them for their membership and they were like ‘what are you talking about?’”

Rob Cowburn, the MC-affiliated current chair of the Pennsylvania party, said the party’s board had investigated the claims and found no impropriety. Instead, he said, a state party member had canvassed for new recruits and had paid the membership fees for people who agreed to join.

Meanwhile in New Hampshire, where the MC has a particularly strong presence, an anti-MC candidate, who had long been involved in Libertarian leadership, lost the election to a challenger on the right who had recently joined the party. Party rules would normally prohibit such a new member from holding office. But a provision in the bylaws allows people who hold “lifetime memberships” to run for party office immediately. The newcomer bought the membership and was elected that day.

The move “was completely within the rules,” Heisse said. He is correct.

Backlash

Gaughen is no longer affiliated with Pennsylvania’s Libertarian party. After the MC takeover this year, he and allies launched the Keystone Party of Pennsylvania, which bills itself as a libertarian party without the baggage.

Anti-MC factions in other states have made similar pivots. In Delaware, McVay and other MC opponents have left the state party to launch an organization called Non-Partisan Delaware, which is currently running nine candidates on the general election ballot in November. McVay has also begun work with a group called the [Libertarian Defense Fund](#), which offers services to Libertarian parties dealing with “hostile takeover attempts,” namely from the MC.

Other state Libertarian parties have tried other tactics, to varying degrees of success. In 2021, after an MC sweep of New Hampshire’s Libertarian party, the organization’s former chair [attempted to form a second, splinter version of the party](#). She won support from the Libertarian National Committee’s then-chair, Joe Bishop-Henchman, who received so much criticism that he resigned from the party altogether.

“I will not chair a party that knowingly and has now affirmatively chosen to stay affiliated with the toxic garbage that was being spewed by the New Hampshire party and similar bad actors in other states, the violent threats emanating from these people, and the deliberate destruction of the party’s ability to appeal to voters and win elections,” Bishop-Henchman [wrote in an outgoing email to the LNC](#).

“One day it was just a light switch that went off. Suddenly anyone associated with Mises did not like us.”

Massachusetts underwent [a similar schism early this year](#), with anti-MC members doing business as

the “Libertarian Association of Massachusetts” and MC affiliates operating as the “Libertarian Party of Massachusetts.” The national LP recognizes only the latter group as legitimate.

The state-level breakdowns have also spread to New Mexico and Virginia. In August, the New Mexico party [published a lengthy letter](#) announcing its disaffiliation from the national party, lambasting the organization for what New Mexican Libertarians described as a refusal to recognize changes to their state bylaws. (The bylaw change was part of an effort to change election schedules so that one faction could not sweep the party all at once, New Mexico chair Chris Luchini said.)



Virginia’s Libertarian party voted to dissolve the same day.

“Statements from the national party, including those endorsing thinly-veiled antisemitism, explicitly welcoming bigotry into the party, reversing the LP’s 50-year legacy of support for LGBTQ+ rights, and openly denouncing women’s suffrage, the civil rights act, and democracy itself, has rendered the national image of the party functionally indistinct from other alt-right parties and movements,” the former party’s [parting resolution reads](#).

Heisse, for his part, denied that the MC was the one driving away former Libertarians.

“People who lose elections tend to feel ‘alienated,’ so our opposition in the party being put off by our ‘abrasive tactics’ is unsurprising,” he wrote in an email. “What exactly constitutes ‘abrasive’? The Mises Caucus has never stolen any state parties, or purged any members. Yet, a tiny minority of people who did not get their way in legitimate conventions have egregiously and repeatedly violated bylaws and members’ rights time and again in states like New Hampshire, Delaware, Massachusetts, Idaho, New Mexico and Virginia.”

But even after rifts, the factional battles have continued. A Twitter account claiming to be the “Keystone Party of Pennsylvania Mises Caucus” describes itself as the “caucus that will takeover the Keystone Party of Pennsylvania.” The account, which Gaughen says is a troll, has set about heckling his new party.

Evans, the aspiring Idaho politician who withdrew his congressional candidacy this year, said he might find his way back to the party.

“I’m not ruling it out,” he said. “I just know that I will not run as a candidate for the Libertarian Party or under the Libertarian banner with the current leadership.”



LNC Fight
It's Our Party

[Home](#)

[Fighting Now](#) ▼

Why Michigan's Fight Matters

Independence, autonomy, and liberty!

How Did We Arrive Here?

Timeline of events

The Libertarian Party of Michigan is fighting for its very existence. Our elected leaders have been forced to take a stand against the LNC and those in Michigan attempting to replace the organization's elected leadership with their own chosen representatives.

'This Fight Matters and We Need Your Help.'

We are a grassroots organization, deeply rooted in the values of liberty and justice for all. Every day, we work hard to protect the rights of individual liberty within Michigan. We have come to this point today because we have a moral obligation to defend our members who voted against the new leadership strategy and national usurpation of delegate rights.

'This isn't just about us. It's about standing up for what's right.'

None of us wanted this. But we can't do this alone. We need your help to get the legal assistance we will need to fight this battle for you. We are asking for your financial support to help us in a fight against a hostile takeover of our organization. Your donation would go towards the funding of a legal defense of individual members of the board and any future court challenges, allowing us to obtain legal advice as necessary and for us to best prepare for the possibility of a long court battle ahead of us.

'It's now or never.'

This is a critical moment for the LPM, and state affiliates across this county. Every donation toward the Legal Defense Fund matters. Some things are worth fighting for and defending the autonomy of the affiliate in Michigan is defending the autonomy of ALL state affiliates. Please consider donating today and help us keep the door open for freedom and justice in Michigan and across this country.

In Liberty,

Mike Saliba, Chair

P.S. Your generous donation to the Legal Defense Fund will help us stand firm and protect the rights of members in Michigan and defend the rights of libertarians across this country from National overreach into the affairs of their affiliates. Thank you for your support!

Donate Now



[Home](#)

[Fighting Now](#) ▼

Why Michigan's Fight Matters

Independence, autonomy, and liberty!

MICHIGAN

5/12/2023 · 2 min read

In the spirit of upholding the values of individual freedom and limited government, it is essential to rally behind the Libertarians in Michigan as they face a trademark lawsuit from the Libertarian National Committee (LNC). This blog post aims to highlight the significance of supporting the state affiliate in Michigan in their legal defense efforts and the broader implications of this lawsuit on the libertarian movement as a whole.

1. **Protecting Autonomy and Promoting Diversity:** By donating to help the libertarians in Michigan to defend themselves against the trademark lawsuit, you are supporting the autonomy of state-level affiliates within the libertarian movement. Upholding the independence of state parties allows for diversity in policy approaches, tailoring them to address local issues and reflect the unique needs of the Michigan population. Your contribution helps ensure that the affiliate and members can continue to advance libertarian principles within their state.
2. **Preserving Libertarian Principles:** The lawsuit filed by the LNC against several board members of the affiliate in Michigan not only threatens the autonomy of the state party but also raises concerns about the broader principles of limited government and individual freedom. By donating, you can actively participate in preserving these core tenets of the libertarian movement. Your support enables them to mount a robust defense, sending a strong message that attempts to undermine libertarian principles will not go unchallenged.
3. **Ensuring a Fair Legal Process:** Legal battles can be financially burdensome, and the party will need substantial resources to mount an effective defense. By donating, you can help level the playing field and ensure that the party has the necessary means to engage competent legal representation. A fair legal process requires that all parties involved have the resources to present their case adequately, and your contribution plays a vital role in achieving that fairness.
4. **Strengthening Unity within the Libertarian Movement:** In the face of a trademark lawsuit, it is crucial for libertarians to rally together and demonstrate solidarity. By donating to the Legal Defense Fund, you send a powerful message of unity, showing that libertarians across the nation support their cause. Strengthening unity within the libertarian movement is essential for advancing shared goals and ideals, fostering collaboration, and enhancing the

advancing shared goals and ideals, fostering collaboration, and enhancing the overall impact of libertarian principles in society.

Donating to the legal defense fund is an opportunity to actively support the autonomy of state parties, preserve libertarian principles, ensure a fair legal process, and strengthen unity within the libertarian movement. By contributing, you play a crucial role in protecting the principles of limited government and individual freedom, not just in Michigan but also across the broader libertarian community. Your support empowers the Libertarians in Michigan to defend themselves against the trademark lawsuit and sends a resounding message that libertarians stand united in the face of challenges to their ideals. Together, we can make a difference and safeguard the future of libertarianism in Michigan and beyond.

Donate Now



Home News About ▾ Get Involved ▾ Donate ▾ Join/Renew

Donate to LPM Legal Defense

Notice of Ongoing Governance Dispute

The Libertarian Party of Michigan (LPM) is the state-level affiliate of the Libertarian Party. Since early 2023, there has been a governance dispute in which two separate groups claim to be the legitimately elected members of LPM's executive committee, which functions as the party's leadership at the state level. The two groups are operating independently from each other, conducting their own fundraising, and holding party funds in separate accounts.

The funds donated through this webpage will be placed in the management of the executive committee chaired by Mike Saliba. For a detailed explanation of the origins of the governance dispute and the reasons why Mr. Saliba is LPM's legitimately elected chair, please see [this letter from LPM's legal counsel](#).

Notably, the Libertarian National Committee (LNC), which is the governing arm of the Libertarian Party at the national level, has thrown its support behind Mr. Chadderdon. The LNC is currently suing Mr. Saliba and other executive committee members for trademark infringement. Funds donated to the Legal Defense Fund on this website will be used to defend against the trademark suit and in other pending litigation relating to the governance dispute.

If you would like to donate to the rival board chaired by Mr. Chadderdon, you are on the wrong website. The Chadderdon faction's website can be accessed via this [link](#).

Donate to LPM

Home News About Get Involved Donate Join/Renew

Donate to LPM

The Libertarian Party of Michigan does not take special interest money, it relies on the support of people like you. You'll also have a voting say in our party at our conventions. Your support will help build a stronger, more effective Libertarian Party of Michigan.

Notice of Ongoing Governance Dispute

The Libertarian Party of Michigan (LPM) is the state-level affiliate of the Libertarian Party. Since early 2023, there has been a governance dispute in which two separate groups claim to be the legitimately elected members of LPM's executive committee, which functions as the party's leadership at the state level. The two groups are operating independently from each other, conducting their own fundraising, and holding party funds in separate accounts.

The funds donated through this webpage will be placed in the management of the executive committee chaired by Mike Saliba. For a detailed explanation of the origins of the governance dispute and the reasons why Mr. Saliba is LPM's legitimately elected chair, please see [this letter from LPM's legal counsel](#).

Notably, the Libertarian National Committee (LNC), which is the governing arm of the Libertarian Party at the national level, has thrown its support behind Mr. Chadderdon. The LNC is currently suing Mr. Saliba and other executive committee members for trademark infringement. Funds donated to the Legal Defense Fund on this website will be used to defend against the trademark suit and in other pending litigation relating to the governance dispute.

If you would like to donate to the rival board chaired by Mr. Chadderdon, you are on the wrong website. The Chadderdon faction's website can be accessed via this [link](#).

Over 70 Delegates Elect LEC Patch Bylaws

by *Scotty Boman*

[Link to the May 2023 Michigan Libertarian \(Special Edition\)](#)

Lansing, MI – On April 1st 72* Libertarian Party of Michigan (LPM) Members attended their 2023 Regular [Convention](#). This Convention was called by the Libertarian Party of Michigan Executive Committee ([LEC](#)) Chaired by Mike Saliba. The core functions of the convention were to Elect New Party Officers, consider amendments to the Bylaws, and to consider amendments to the Platform. All LEC officer terms end at Conventions that occur on odd-numbered years, and [Bylaws](#) may only be amended at Regular Conventions held on odd-numbered years. An additional item was to consider an investigation into alleged NDA violations, as was requested in a petition signed by over 10% of the membership.

Bylaws Fine-Tuned in Light of Recent Events

The Bylaws debate has become a routine biannual convention activity, however this year the bylaws took on a special significance in light of the on-going leadership [conflict](#). Much of that conflict resulted from disagreements over ambiguities in the document.

One change was to explicitly identify state conventions on both odd and even numbered years to be regular, while continuing to have officer terms end on odd-numbered years. Bylaw amendments would continue to only be on odd numbered years.



Delegates Doing convention Business.

Some other amendments clarified how vacancies were to be filled and by whom. This included having vacancies filled at regular conventions held on even numbered years and having the LEC fill vacancies

between conventions. The bylaws also specified that notice of specific vacancies was no longer required. In 2022 the resignation of Chair and Vice Chair, shortly before the July 9th convention precipitated the current leadership crisis because the vacancies occurred too close to the convention to provide 60 days' notice, of the vacancies to members.

The amendments also clarified the process for removing officers. As a non-profit [corporation](#) the Board (LEC in our case) can relieve an officer of duties, but not remove that person from office. A convention body may remove officers, however. The new bylaws permit convention delegates to remove any officer by a majority vote of no confidence. Under the new bylaws, officers may remove themselves immediately by resignation, or by missing three consecutive meetings.

Under the new bylaws the LPM has no standing Judicial Committee, instead, the bylaws establish a process by which a judicial committee is established to adjudicate a specific dispute. Delegates also voted to extend the prior-membership requirement, for eligible convention delegates, from 30 to 60 days.

Delegates Elect New Officers

Delegates elect officers to two-year terms at regular conventions on odd-numbered years. Following the resignation of elected **Chair** Joe Brungardt, elected First Vice Chair **Mike Saliba** had taken on the roll of Chair. Delegates elected him to Chair the Libertarian Party for a full term by acclamation.

Rafael Wolfe and Mark King faced off for the **First Vice Chair (Affiliate director)** position. Wolfe won with 47 votes and King 18 delegates voted for King. NOTA received a vote too.

Delegates elected **Greg Stempfle** to be **Second Vice Chair (Political Director)** by acclamation.

Delegates elected **Jami Van Alstine** to be **Secretary**, and **Angela Thornton** to be **Treasurer** by acclamation.

District caucuses elected the following people to be **District Representatives**:



Officers officiating as delegates discuss bylaws.

1st: Remains vacant

2nd: Jay Gillotte

3rd: Ari Abraham

4th: Andrew Duke

5th: Brian Ellison

6th: Mark King

7th: Lisa Lane Gioia

8th: Adam Childress

9th: Kyle McCauley

10th: Remains vacant

11th: Joe Brungardt

12th: Remains vacant

13th: Gregg Smith

For the first time in LPM history, delegates elected no Judicial Committee. Since Delegates amended the bylaws to replace the standing Judicial Committee with a process for appointing a temporary Judicial Committee on an as-needed basis

Lansing Delegates Stand on One new Platform Plank & a Notable “No” Vote

Delegates Reject Anti-Bigotry Amendment

Contextual note: Thus far the author has focused on the outcome of the convention, with defeated motions being left out. However this vote was notable given that some people view the untimely resignations of leading officers, like former Chair Chair Tim Yow and former Vice First Chair Ben Borren, as being the spark that ignited the current leadership crisis. The replacement of a clause in the pre-2022 Libertarian National Committee (LNC) platform that read, “We condemn bigotry as irrational and repugnant.” Motivated those and other resignations. That change was a key agenda item promoted by the Mises Caucus (MC). The split in leadership is largely along MC and anti-MC lines with Lansing Convention Delegates being primarily from the anti-MC camp.

Jim Fulner is the only delegate to participate in both the Wixom Special Convention (Chaired by Andrew Chadderdon), and the Lansing Regular Convention (Chaired by Mike Saliba). He moved to amend the platform to add a sentence to Article I Section 6 that would read, “We condemn bigotry as irrational and repugnant.” The proposal failed by a voice vote.

That section currently reads,

We oppose any form of discrimination by government based on race, ethnicity, religion, gender, sexual orientation or any other group or individual identification. Each person has the same inalienable rights that the State has a duty to protect.

The debate was concluded with comments, against the amendment, from two Central figures in LPM history. They briefly came out of retirement for this convention. Tim O'Brien said,

I agree, personally, that I condemn racism as... , but what this party is concerned about what government does. If somebody is a bigot, I think they're irrational, but that's not what we're here about. We're here about government, and government discrimination...

Brass Roots founder Jon Coon commented,

Frankly I would be very surprised if every libertarian in this room couldn't find a view held that wasn't repugnant. This isn't about what we view as repugnant, but what we intend to do (or not do) about political or social activity... Personally I find racism and bigotry to be repugnant (Make no mistake about it), but if you show me a racist who is willing to take the oath and not implementing anything (regarding that feeling that they have) in the political realm... then your about to strike me down , but I found an ally, and I think if you look inside, you would agree.



Tim and Nancy O'Brien, Scotty Boman, Renae & Jon Coon.

One Plank Added

Fulner introduced another plan that won support of the delegates. It read,

All software purchased or developed by state employees in the performance of their duties, or run on government owned machines, should be published under the GNU Public License, or a similarly freedom respecting Free Software license

Unity Resolutions Fail, Libertarians United on Guns

Both Scotty Boman and James Fulner introduced resolutions calling for unification of the LPM leadership. Both called on as many Lansing delegates as possible to attend the Regular Convention, which will likely be scheduled for a date in July by the Andrew-Chadderdon-Chaired board. Fulner's resolution made jabs at the other faction, with a bit of tongue-in-cheek commentary. While Boman's resolution may have drawn a majority of support, they both failed to meet the two-third super-majority requirement.

A different resolution, introduced by Max Riekse passed unanimously. It read,

Resolved that the Libertarian Party of Michigan go on the record condemning in the strongest possible terms the recently passed unconstitutional anti-gun laws by the Michigan State Legislature; these laws do not give Michigan citizens due process and go against the spirit and meaning of the Second Amendment of the United States Constitution.

Straw No Confidence Vote

Mike Saliba introduced a motion that had the effect of seeing how delegates would have voted had they been at the [Special Convention](#) being held in Wixom by the Andrew Chadderdon team. It read,

Whereas the petition to remove Andrew Chadderdon is no longer necessary, this body affirms they would have voted to remove him if given the opportunity to do so.

The motion passed with 58 delegates voting in favor, and 4 delegates voting against it. While the 58 votes solidly exceeded the attendance of the Wixom event, they would have fallen short of the two-thirds needed to remove him.

A Historical convention with Historical Personalities

The 2023 LPM convention was exceptionally well attended with 72 people registered, 75 total attendees and 71 total delegates. A few came out of their retirement from politics to participate in this convention at an existential time in LPM history. This included the re-appearance of the media-savvy Tim and Nancy O'Brien, as well as [Brass Roots](#) founder Jon Coon and his wife Renee. Tim and Jon appear in this video:

<https://youtu.be/KsVsQReam1Y>

at the 13 minute mark Coon calls out his establishment opponents saying, “Leadership is not division, it’s unity... that’s number one: Quit driving a wedge and do the things we all know will make a difference first.”



Gregory Creswell and Jacob Hornberger.

Another special moment was a visit from [Future of Freedom Foundation](#) founder [Jacob Hornberger](#). He is currently a candidate for President. Other candidates were invited, but he was the only candidate available to attend.

Detailed minutes of the convention are available here:

<https://michiganlp.net/wp-content/uploads/2023/04/LPM-RegularConventionMinutes040123Lansing-DRAFT.pdf>

Videos of the business meeting are here:

https://youtube.com/playlist?list=PLM5V9L4QYkEc_-61TdRnrgm_Rgn_gTt2Y

* 75 Libertarians attended the convention with the highest delegate count being 71. When votes were counted there were typically 66 voting delegates. The addition of other guests brought the total attendance to 75.

[Link to the May 2023 Michigan Libertarian \(Special Edition\)](#)

Email to Members from the Chair of the Libertarian Party of Michigan

by Jami Van Alstine

Sent: 02/02/2023 8:51 AM EST

Dear Members,

I am sure many of you have become aware of the LPM Executive Committee meeting that took place the evening of January 31, 2023. The reason this meeting took place is because many of the officers elected on July 9, 2022 learned that our party has recently been operating in a manner that is inappropriate given our status as a Michigan Nonprofit Corporation. The resultant actions that took place after the Judicial Committee released its report regarding Mr. Chadderdon's appeal of the July 9 Convention, have been found to be unauthorized, and void.

This obviously lends itself to confusion and difficulty as we navigate through the decisions that must be made to rectify the actions that followed the Judicial Committee's decision.

There are several questions at hand. This letter hopes to address each of those questions.

Why were the actions taken by certain members of the Libertarian Party of Michigan following the Judicial Committee decision?

Certainly, many asked the question, "What does the Judicial Committee report mean?" While some took it to mean that the board of the Libertarian Party of Michigan was reverted to its form before the July 9th Convention, there are two main issues with that.

First, the Libertarian Party of Michigan is a membership organization, and it is not possible for a committee to remove a member of its board that was elected by vote of the members. There is not authorization in our bylaws for that. There is no authorization within Robert's Rules of Order to accomplish that. And perhaps most importantly, the Nonprofit Corporation Act 162 of 1982 specifically authorizes only the members to have the authority to remove a member of the board that was elected by the members. The Act does allow bylaws to specify other methods, but our bylaws do not provide authority to any Committee to remove member-elected board members.

Second, the Libertarian Party of Michigan has never authorized the Judicial Committee or any other committee to overrule the actions of its members as represented by its delegates at convention. The members of this party have the ultimate authority, and that authority is vested in its delegates to all Conventions of the Libertarian Party of Michigan.

Therefore, we are now taking actions to rectify the inappropriate, and unauthorized actions of certain members that took place following the Judicial Committee report.

What was the appropriate action following the Judicial Committee report?

What should have occurred, following the Judicial Committee report, would have been for the Executive Committee to call a Special Convention, for the purpose of allowing the members to act on the Judicial Committee report. Given the confusion surrounding the Judicial Committee's report, we did not call an Executive Committee meeting to take this action because unfortunately, we didn't properly understand our responsibilities. After seeking legal counsel, and the advice of many long-standing members in the party to understand further the precedence, we now understand what the appropriate action would have been.

What is the impact of the Judicial Committee report?

The impact of the Judicial Committee report is to offer guidance to the Executive Committee and members on how to proceed to better align with the bylaws of the Libertarian Party of Michigan per their interpretation and reporting on specific cases.

Since the Judicial Committee report ruled that the bylaws were violated at the convention in July, it would be incumbent upon the Executive Committee to seek the rectify such violations in a manner that preserves the integrity of the party, allows the members to assert their rights, and maintains the appropriate functioning of the party until any bylaw violations can be appropriately rectified.

However, the Judicial Committee has no authority to overrule the delegates of a convention body. Therefore, should the Executive Committee believe that the Judicial Committee is overstepping its authority, it is incumbent upon the Executive Committee to assert the rights of its members in opposition to the Judicial Committee if necessary.

What proof do you have that this is the legally correct action of the party?

In addition to being the state affiliate of the Libertarian Party in Michigan, the LPM is also incorporated as a Nonprofit Corporation in the State of Michigan and is bound by the laws governing such organizations. The members of the LPM Executive Committee are legally the directors of the corporation. Only the directors of the corporation can act on behalf of the corporation. Members of the Judicial Committee are not directors of the corporation.

According to the Michigan NONPROFIT CORPORATION ACT 162 of 1982, the Judicial Committee does not have the authority to remove an officer elected by the members of the organization.

450.2535 Removal of officer; suspension of authority to act; contract rights; resignation of officer; notice. Sec. 535. (1) An officer elected or appointed by the board may be removed by the board with or without cause. An officer elected by the shareholders or members may be removed, with or without

cause, only by vote of the shareholders or members. The authority of the officer to act as an officer may be suspended by the board for cause.

How do we move forward as a party to a unite and fight for liberty in our lifetime?

The Executive Committee has, as prescribed in our bylaws, authorized and issued a Call to our Regular Convention for April 1, 2023 at the Hilton Garden Inn at 633 North Canal Road in Lansing, MI for party members to elect all officers and choose the party's direction. A call was sent for volunteers for a bylaws committee that will address issues in our bylaws that have left the LPM open to the conflicts that we have seen over the past several months. The LPM is committed to fully supporting the efforts underway by several dedicated volunteers targeting opportunities and recruiting Libertarian candidates to win local elections in 2023.

We request that all parties respect the right and authority of the members of the LPM to proceed with the convention on April 1 in Lansing to decide on the leadership and the business of the party.

Who are the members of the Libertarian Party of Michigan Executive Committee?

Chair – Joe Brungardt

First Vice Chair – Mike Saliba

Second Vice Chair – Mary Buzuma

Secretary – Daniel Ziemba

Treasurer – Vacant

District 1 – Ryan Roberts

District 2 – Vacant

District 3 – Jordan Martin

District 4 – Rick Thelen

District 5 – Dave Canny

District 6 – Rafael Wolf

District 7 – Brian Ellison

District 8 – Jon Elgas

District 9 – Greg Stempfle

District 10 – Kyle McCauley

District 11 – Bruce Jaquays

District 12 – Daniel Muehl-Miller

District 13 – Jami Van Alstine

District 14 – Scotty Boman

If I have concerns, who should I speak with?

If you have concerns, I encourage you to speak with your District Representative. You are certainly welcome to reach out to any member of the board, but your District Representative is responsible for taking up your concerns and speaking on your behalf to the board at any of its meetings.

Thank you for being a member of the Libertarian Party of Michigan. And look to upcoming announcements and information as it relates to the discoveries outlined here, and the appropriate actions to be taken looking forward.

Sincerely,

Joe Brungardt

Chair

Libertarian Party of Michigan

Libertarian Party of Michigan
Minutes of the State Convention
Haworth Hotel
Holland, Michigan
July 9, 2022

- Call to Order
 - The convention was called to order at 09:01 by Acting Chair Andrew Chadderdon
- Opening Remarks
 - Acting Chair Andrew C recounted the resignations of former Chair Tim Yow and 1st Vice Chair Ben Boren, among others. He also notes the incorporation and associated “corporate bylaws” of the LEC created in 2005, and subsequent inquiries made with parliamentarians and an attorney in an effort to determine available courses of action to fill board vacancies.
- Credentials Report
 - Credentials Chair Jeff Pittel reported a total of 60 delegates present
 - 31=50%, 41=2/3, 53 =7/8
 - Brian Ellison moves to approve the Credentials Report
 - 2nded
 - Approved by voice vote
- Approval of Agenda
 - Joe Brungardt motions to amend the agenda by substitution the one in the provided packet with that provided to the Secretary this morning
 - 2nded
 - Acting Chair Andrew C rules the motion out of order pursuant to RONR 47:58 & 56:32
 - Bill Gellineau Appeals the ruling of the Chair
 - Andrew C rules this appeal out of order per the rationale above, but offers to the body to replace him as Convention Chair (a majority threshold vote vs. a 2/3 owing to his consent)
 - Brian Ellison appeals the ruling of the chair (again)
 - Andrew C rules this appeal out of order
 - Dave Canny motions to replace Andrew C with Joe Brungardt as Convention Chair
 - 2nded
 - Ryan Brennan calls the question
 - Approved by standing vote; Joe Brungardt takes over as Convention Chair
 - Brian E motions to adopt by substitution the Brugardt agenda submitted this morning
 - 2nded
 - Joe LeBlanc motions to swap the positions of the candidate nominations and officer elections (roughly swapping the morning and afternoon business)
 - 2nded
 - Question called
 - Question called by rising vote
 - Amendment fails by rising vote
 - Question called on motion to substitute agenda as submitted
 - Motion passes

- Adoption of Convention Rules
 - Jon Elgas moves to adopt rules as proposed
 - 2nded
 - Approved without objection
- Approval of Previous Convention Minutes (Mt. Pleasant June 26, 2021)
 - Brian E moves to approve as submitted
 - 2nded
 - Question called
 - Approved without objection
- Approval of Previous Convention Minutes (Ann Arbor March 13, 2022)
 - 2nded
 - Question called
 - Approved
- Election of 1st Vice Chair (Affiliates Director)
 - Brian E nominates Joe Brungardt for 1st Vice Chair
 - Nomination accepted
 - Kyle McCauley notes the likelihood that Joe B will become Chair pending business during the rest of the day
 - Brian E moves to close nominations
 - 2nded
 - Nominations closed
 - Brian E moves to approve this election by acclamation
 - 2nded
 - Approved without objection

Updated Credentials Committee Report

- Credentials Chair Jeff Pittel reported a total of 67 delegates present
 - 34=50%, 45=2/3, 59 =7/8
 - Angela Thornton moves to accept the report
 - 2nded

Return to 1st Vice Chair Election

- Joe Brungardt elected
- Motion of No Confidence in Andrew Chadderdon (by Dave Canny)
 - 2nded

WHEREAS, Libertarian Party of Michigan Chair Mr. Andrew Chadderdon while serving as Political Director failed to fulfill his fiduciary duty defined in the LPM bylaws as “recruiting candidates for public office and helping them organize their campaigns.”;

WHEREAS, Mr. Chadderdon delayed properly notifying the Secretary of State and the Bureau of Elections of the July 9th convention which would have invalidated the slate of candidates requiring a former Executive Committee member to ensure the task was performed;

WHEREAS, Mr. Chadderdon has knowingly failed to provide notice to members and delegates of elections to fill Executive Committee vacancies at the July 9th Convention;

WHEREAS, Mr. Chadderdon delayed providing a business agenda for the July 9th Convention in a timely manner to be distributed to membership and delegates;

WHEREAS, Mr. Chadderdon has failed to foster a cooperative environment within the Executive Committee and has added tension to its operations by the introduction of a Sergeant at Arms and threats of dismissal from meetings to members of the Board;

WHEREAS, Mr. Chadderdon has consistently used the Bylaws and Robert's Rules as a weapon against those who oppose him rather than using them as a tool to facilitate cooperation;

WHEREAS, Mr. Chadderdon has sought to retain Legal Counsel on behalf of the Party, in a manner that would give him unilateral control of the arrangement despite his direct conflict of interest;

WHEREAS, in accordance with our bylaws, a motion of no confidence is the appropriate and most effective option to put the choice of party leadership in the hands of its members;

WE HEREBY SUBMIT, a Motion of No Confidence to remove Mr. Andrew Chadderdon from the Libertarian Party of Michigan Executive Committee and the office of Chair of the LPM immediately upon passage of this motion requiring as detailed in the bylaws the elevation of First Vice Chair to Chair.

- Ryan Brennan inquires whether this motion would elevate Joe Brungardt to Chair should it pass
 - Joe B notes that it would, as Andrew C is currently assessed to be Chair
- Kyle McCauley notes the implication of “breach of fiduciary duty” not denoting any harm caused to the party nor ill intent, but rather poor choices made in execution of his duty as Chair
- Standing vote called by Convention Chair
 - 38 counted in favor
 - 18 counted against
 - Motion passes; Andrew C removed as Chair and Joe Brungardt becomes Chair of LPM
- Election of 1st Vice Chair (newly vacated)
 - Greg Stempfle nominates Mike Saliba
 - 2nded
 - Mary Buzuma nominates Kyle McCauley
 - 2nded
 - Ryan Brennan nominates NOTA
 - Chair Joe B notes that NOTA will be present on every ballot regardless
 - Bill Gelineau requests a brief speech from each candidate
 - Motion to close nominations passes without objection
 - Chair Joe B calls candidates to speak for 2 minutes each
 - Mike Saliba speaks first, noting his participation since the 2000s, including briefly leaving following the Portland Massacre, and re-founding the Macomb affiliate in 2016. He notes his status as longest tenured current LEC member and successful past candidate.
 - Kyle McCauley speaks second, noting his professional experience running businesses and organizations, and relevant legal contacts to assist in correcting bylaws deficiencies. He also notes that since this is a 9 month commitment he is confident in his ability to successfully serve his tenure.
 - Vote tally:
 - Mike Saliba - 29
 - Kyle McCauley – 22
 - NOTA – 9
 - This election is illegitimate - 1
 - Greg Stempfle moves to accept Mike Saliba by acclamation

- 2nded
 - Vote held and Mike Saliba elected
- Election of 2nd Vice Chair (due to Andrew's elevation/removal)
 - Scotty B nominates Andrew Chadderdon
 - 2nded
 - Andrew C declines the nomination
 - Kyle McCauley nominates Mary Buzuma
 - 2nded
 - Mary B accepts nomination
 - Claranna Gelineau nominates Kyle McCauley
 - 2nded
 - Kyle M declines the nomination
 - Steve Fox moves to close nominations
 - 2nded
 - Nominations closed without objection
 - Jon Elgas moves to accept Mary Buzuma's nomination by acclamation
 - 2nded
 - Approved without objection
 - Mary Buzuma elected 2nd Vice Chair
- Caucus by 2018 MI Congressional Districts (for LEC seat elections, where applicable)
 - District 1
 - No change
 - District 2
 - No change
 - District 3
 - No change
 - District 4
 - No change
 - District 5
 - No change
 - District 6
 - Rafael Wolf elected to LEC
 - District 7
 - No change
 - District 8
 - Jon Elgas elected to LEC
 - District 9
 - Greg Stempfle elected to LEC
 - District 10
 - Kyle McCauley elected to LEC
 - District 11
 - No change
 - District 12
 - No change
 - District 13
 - Remains vacant for lack of a candidate
 - District 14
 - Scotty Boman elected to LEC

- Larry Johnson motions to suspend the rules to nominate Rhett Hamel to the Wayne County delegation
 - 2nded
 - Question called
 - Approved by voice vote
- Statewide candidate nominations
 - Gubernatorial nominations opened
 - Bruce Jaquays self-nominates for Governor
 - 2nded
 - Bill Gelineau nominates Mary Buzuma
 - 2nded
 - Greg Stempfle nominates Joe McHugh
 - 2nded
 - Carl Mintz Nominates Evan Space
 - 2nded
 - Candidate Speeches
 - Bruce J notes his family's history in MI, and his current residence in Walled Lake. He plans to change MI government primarily by using the budget to compel the other parties to work within its constraints. He wishes to model the attitude of working for change for his daughters.
 - Mary B notes her home affiliate of West Michigan, and past candidacy for Governor. "It's time to bring liberty to Michigan, finally." She hopes to poll high enough to enter the debates, and to change Michigan's culture through liberty. This is intended as her last time running for the office. She is flabbergasted by Whitmer's expenditure of \$76Bn. Bill G speaks also in favor of Mary's nomination, noting her experience as a command officer in the Navy.
 - Joe M notes what constitutes liberty, and that today's government exhibits the opposite thereof. Gasoline prices have more than doubled, the money supply increases have inflated all other goods as well. End the fed and go green instead, at a state level. He would replace the central bank with a credit union to place profits with the people, rather than the bank. Keep favoritism out of the law. Legalize all non-violent, consensual activities in which adults wish to engage.
 - Evan S introduces himself as a newborn porcupine. He is an MI National Guard veteran. He aims to eliminate MI's income tax, and introduce full transparency in MI government spending. The FOC and DOC should be restructured. He is pro-marijuana, pro-gun, and in favor of all Libertarian policies.
 - Vote tally:
 - Bruce Jaquays – 5
 - **Mary Buzuma – 50**
 - Joe McHugh – 6
 - Evan Space – 7
 - NOTA – 0

- Lieutenant Governor Nominations
 - Mary Buzuma nominates Brian Ellison
 - 2nded
 - Andrew Hall moves to vote by acclimation
 - 2nded
 - Approved
 - Mary B speaks to Brian's speaking ability, and her common agreement and trust in him to support her as governor. Brian E notes his gratitude for Mary's nomination and asks for the body's support.
 - Approved by acclimation
- Secretary of State Nominations
 - Scotty Boman nominates Greg Stempfle
 - 2nded
 - Andrew Hall moves to vote by acclimation
 - 2nded
 - Approved without objection
 - Scotty B speaks to Greg S's exceptional competence and knowledge of electoral law. He has previously noted mistakes made by sitting Secretaries of State due to his knowledge. Greg S states his objective to place one of the "major" parties below him on the SoS results this year. He plans to simplify MI electoral laws as SoS, and requests any volunteers for his campaign to gain valuable experience.
 - Approved by acclimation
- Attorney General Nominations
 - Jon Elgas moves to open nominations
 - 2nded
 - Greg Stempfle and Scotty Boman note that one need not be an attorney to become Attorney General
 - Brian Ellison nominates Kyle McCauley
 - 2nded
 - Kyle requests time to consider acceptance
 - Bruce Jaquays self-nominates
 - 2nded
 - Brian E moves to table this nomination until after lunch
 - 2nded
 - Question called
 - Approved without objection
- Supreme Court of MI Nominations (2 seats open)
 - Dakota Keeler motions to open nominations
 - 2nded
 - Bill Gelineau nominates Kerry Morgan
 - 2nded
 - Scotty Boman nominates Robert Roddis
 - Retracted due to input from the floor that Robert is ineligible
 - Greg Stempfle moves to close nominations
 - 2nded
 - Approved without objection
 - Vote by acclimation accepted without objection

- 2nded
 - Bill Gelineau nominates Joe McHugh
 - 2nded
 - Bruce J requests withdrawal from the race
 - Withdrawn without objection
 - Brian E moves to close nominations
 - 2nded
 - Nominations closed without objection
 - Greg B notes his residence in central MI, and his desire to bring transparency and accountability to government in MI.
 - Joe M congratulates Mary B on her nomination for Governor. Joe notes he is a former Marine Corps officer, and wishes to bring about governance based upon a Constitutional interpretation reflecting: freedom of speech, though, and association; defense of self by any means chosen; privacy; etc. He plans to knock down every law that violates individual rights. Bill Gelineau notes that he nominated Joe M in light of his earlier presentation and experience.
 - Vote Tally:
 - Greg Black - 21
 - **Joe McHugh - 37**
 - NOTA - 1
 - Abort the Government - 1
 - Clint Black - 1
 - It's Okay Andrew - 1
 - Kerry Morgan – 1
- MSU Board of Trustees Nominations (2 open seats)
 - Nominations reopened without objection
 - Max Riekse self-nominates
 - 2nded
 - Bill Gelineau nominates Claranna Gelineau
 - 2nded
 - Jon Elgas moves to close nominations
 - 2nded
 - Nominations closed without objection
 - Jon Elgas moves to accept nominees by acclamation
 - 2nded
 - Approved by voice vote
 - Claranna G notes her desire to support ballot access by running, and wishes to step up in light of Donna G's charge to do so
 - Max R notes his opposition to government mandates, particularly vaccination mandates for those attending MSU. He notes that his son is subject to said mandate in his pursuit of a physics degree from MSU (w/minor in Russian). Also: stop the wars.
 - Approved by acclamation by voice vote
- U of M Board of Regents (2 open seats)
 - Nominations opened without objection
 - Eric Larson self-nominates
 - 2nded
 - Greg Creswell nominates James Hudler
 - 2nded
 - Bruce Jaquays self-nominates
 - 2nded

- Eric L notes having run for this position several times. He fought the speech code while a student in the 90s. He has a daughter at UofM and a younger son aspiring to do so. Eric L notes that he is a physician and disagrees with the path taken vis a vis mandates within the University, and wishes to oppose that.
- James H notes his participation in founding LPM. He notes UofM's buy-up of the last independent lumber yard in Ann Arbor, further shrinking the tax base and raising taxes on others. He supports cutting the funding of the University to curtail this. He also wishes to permit cigarette smoking in addition to cannabis smoking during Hash Bash.
- Bruce J notes that he graduated UofM in 1983 with a Bachelor in Film and Video. He has witnessed the University decline since. He wishes to cut the budget to induce a change in attitude by University leadership. He opposes mandates and wishes to see them reversed.
- Chair Joe B notes that NOTA must not be combined with any candidate lest that ballot be invalidated.
- Brian E moves to allow approval voting.
 - 2nded
 - Scotty Boman moves to amend the motion to allow voting for up to two candidates, with the first two receiving a majority first will be approved
 - Andrew Chadderdon notes a point of order that Convention Rule 10.g prohibits Brian E's motion; only two (2) candidates may be placed on each ballot
 - Chair Joe B rules this amendment out of order per Convention Rules
- Vote Tally:
 - **Eric Larson - 54**
 - **James Hudler - 40**
 - Bruce Jaquays - 25
 - NOTA - 1
 - Max Riekse – 1
- Wayne State University Board of Governors (2 open seats)
 - Greg Stempfle nominates Bruce Jaquays
 - 2nded & accepted
 - Vote by acclimation accepted without objection
 - Bruce J notes that his daughter graduated WSU, and had a possible COVID encounter during that graduation pre-lockdown. He would keep freedom of speech alive on campus, and appropriately disburse funds.
 - Approved by acclimation by voice vote
- US House of Representatives Caucus (per 2021 redistricting) "Representative in Congress" on paperwork
 - District 1
 - Andrew Gale
 - District 2
 - Nathan Hewer
 - District 3
 - Jamie Lewis
 - District 4
 - Lorence Wenke
 - District 5
 - Norm Peterson
 - District 6
 - No nominee

- District 7
 - Leah Dailey
- District 8
 - Dave Canny
- District 9
 - Jacob Kelts
- District 10
 - Mike Saliba
- District 11
 - Evan Space
- District 12
 - No nominee
- District 13
 - Scotty Boman moves to table nomination for District 13 until immediately prior to adjournment in hopes of locating a candidate
 - 2nded
 - Approved without objection
- Jon Elgas moves to table District 6 and 12 nominations in the same manner as 13
 - 2nded
 - Approved without objection
- Affiliate Caucuses
 - Southwest Michigan
 - State House Rep, 41st District – Rafael Wolf
 - Wayne County
 - Sheriff – Joseph LeBlanc
 - Wayne Co. Commissioner, 9th District – Daniel Woike
 - County Commissioner, 4th District – Loel Gnad
 - State Rep, 1st District – Donald Robert Love II
 - State Rep, 12th District – Greg Creswell (self-nominated)
 - West Michigan
 - State Senate, 30th District – Theo Petzold
 - State Senate, 31st District – Jessica Fox
 - State Senate, 33rd District – Jay Gillotte
 - State Rep, 83rd District – Alexander Avery
 - State Rep, 85th District – Greg Parlmer II
 - State Rep, 88th District – Marv Bolthouse
 - Northern Michigan/Straits Area/UPLP
 - State Rep, 103rd District – Courtney Evans
 - State Senate, 37th District – Zachary Dean
 - Huron-Raisin
 - Mayor of Ypsilanti – Mark King
 - Oakland
 - County Commissioner, 8th District – Connor Nepomuceno
 - State Rep, 21st District – James Young
 - Unaffiliated Regions
 - Alpena County Commissioner, 1st District – Scott Parkham
 - MI House 92nd District – Greg Black (self-nominated)
 - Nominations closed without objection
 - Greg Creswell self-nomination for State Rep 12th District approved by acclamation by voice vote

- Jon Elgas self-nominates for State Senate 22nd District
 - 2nded
 - Vote by acclimation approved without objection
 - Jon E approved by acclimation by voice vote
- Non-Partisan and Other Nominations
 - Greg Stempfle nominates Scotty Boman for Community Advisory Council of Detroit
 - 2nded
 - Scotty notes his active LP involvement since 1988, organizational experience in numerous liberty and peace causes, and many past candidacies, including a successful run for Community Advisory Council 4th District 2 years ago, which he left to run in another race last year. He has spoken out against police brutality and corruption. Scotty will be the only name on the ballot for this position.
 - Vote by acclimation approved without objection
 - Approved by acclimation by voice vote
 - Carl Mintz requests endorsement for Farmington Public School Board
 - 2nded
 - Carl has had enough of mandates in the school system, opposes the teaching of Critical Race Theory, and wishes to join parents protesting within the City. He supports a return to teaching math, reading, etc. only.
 - Vote by acclimation approved without objection
 - Approved by acclimation by voice vote
 - Nominations closed by voice vote
- Resolutions
 - Kyle McCauley motions to release the Executive Session Recording with Attorney Eric Doster on July 5th, 2022:

WHEREAS, the Executive Committee engaged in an Executive Session with Attorney Eric Doster,

WHEREAS, the session with Eric Doster was recorded,

WHEREAS, the results of the conversation resulted in no further business, despite the agenda contained items of business designed to retain Mr. Doster for further services and the services of a Parliamentarian, be it

RESOLVED, that the Libertarian Party of Michigan Delegates to the July 9th Convention seek to have the recording of that meeting released for review by the members of the party.

- Resolution recalled from the floor without objection in favor of introduction as a motion during Open Floor
- Mike Saliba motions to adopt the following resolution previously stated by Ron Paul:

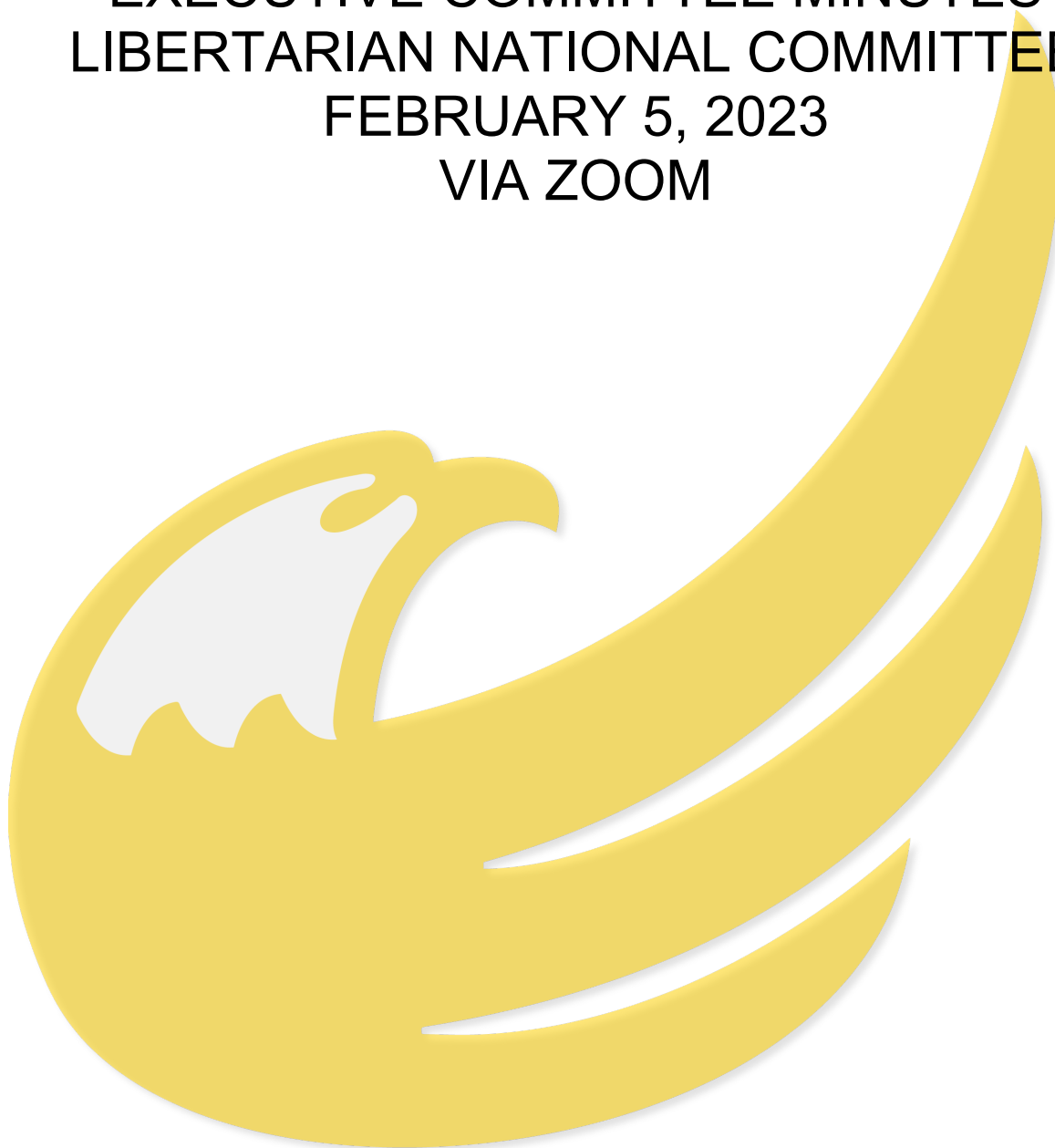
We the Libertarian Party of Michigan voice our agreement with Dr. Ron Paul when he says that “Racism is simply an ugly form of collectivism” and second his statement that “to the contrary, [our] philosophy of individualism is the most radical challenge to racism ever posed.”

- 2nded
 - Passed by voice vote
- Open Floor
 - Kyle McCauley moves to release the executive session recording with Attorney Eric Doster on July 5th, 2022
 - 2nded
 - Brian Ellison speaks in favor, having been the one to originally call for the meeting to occur in executive session
 - Approved without objection
 - Andrew C motions that earmarked donations to cover time spent by the retained Parliamentarian in recent weeks in excess of the chair discretionary fund be utilized for the purpose of payment of the remaining \$275 owed thereto, with the understanding that Andrew C plans to solicit such donations to cover this expense.
 - 2nded
 - Question called by voice vote
 - Approved by rising vote 32-13
- Daniel Ziemba moves to adjourn at 16:07
 - 2nded
 - Approved by voice vote
- LEC Meeting
- Call to order @ 16:16
- Roll Call:
 - Joe Brungardt, Chair
 - Mike Saliba, 1st Vice Chair
 - Mary Buzuma, 2nd Vice Chair
 - Daniel Ziemba, Secretary
 - Norman Peterson, Treasurer
 - Ryan Roberts, District 1
 - Steve Fox, District 2
 - Jordan Martin, District 3
 - Rick Thelen, District 4
 - Dave Canny, District 5
 - Rafael Wolf, District 6
 - Brian Ellison, District 7
 - Jon Elgas, District 8
 - Greg Stempfle, District 9
 - Kyle McCauley, District 10
 - Bruce Jaquays, District 11
 - Daniel Muehl-Miller, District 12
 - Vacant, District 13
 - Scotty Boman, District 14
- Next LEC meeting date
 - Greg S moves to meet on July 18 at 19:30
 - 2nded
 - Approved

- LEC meeting adjourned at 16:21

Daniel Ziemba, PE
Secretary, LPM

EXECUTIVE COMMITTEE MINUTES
LIBERTARIAN NATIONAL COMMITTEE
FEBRUARY 5, 2023
VIA ZOOM



CURRENT STATUS:

FINAL

PREPARED BY **CARYN ANN HARLOS**, LNC SECRETARY

TABLE OF CONTENTS

OPENING CEREMONY	4
CALL TO ORDER	4
HOUSEKEEPING	4
EXECUTIVE COMMITTEE MEMBER ATTENDANCE	4
REMAINING LNC MEMBER ATTENDANCE	4
PURPOSE OF EXECUTIVE COMMITTEE MEETING	4
EXECUTIVE SESSION	5
ADJOURNMENT	5
APPENDIX A – LOG OF REGISTRANTS	6

LEGEND: *text to be inserted*, ~~text to be deleted~~, unchanged existing text, *substantive final main motions*.

All main substantive motions will be set off by *bold and italics in green font* (with related subsidiary and incidental motions *set off by highlighted italics*) and will be assigned a motion number comprising the date and a sequential number to be recorded in the Secretary's Main Motion/Ballot Tally record located at <https://tinyurl.com/LNCVotes2023>

Points of Order and substantive objections will be indicated in **BOLD RED TEXT**.

All vote results, challenges, and rulings will be set off by **BOLD ITALICS**.

The Secretary produces an electronic One Note notebook for each meeting that contains all reports submitted as well as supplementary information. The notebook for this meeting can be found at: <https://tinyurl.com/Feb2023LNCMeeting>

The LPedia article for this meeting can be found at:
https://lpedia.org/wiki/LNC_Executive_Committee_Meeting_5_February_2023

Recordings for this meeting can be found at the LPedia link.

The QR codes lead to the video portion of the video being discussed.

OPENING CEREMONY

CALL TO ORDER

Chair Angela McArdle called the meeting to order at 8:12 p.m. (all times Eastern).

HOUSEKEEPING

EXECUTIVE COMMITTEE MEMBER ATTENDANCE

The following were in attendance:¹

Officers: Angela McArdle (Chair), Caryn Ann Harlos (Secretary), Todd Hagopian (Treasurer)

Non-Officers: Rich Bowen (At-Large), Bryan Elliott (At-Large), Steven Nekhaila (At-Large)

REMAINING LNC MEMBER ATTENDANCE

At-Large Representatives: Dustin Blankenship, Mike Rufo

Regional Representatives: Miguel Duque (Region 1), Dave Benner (Region 2), Dustin Nanna (Region 3), Carrie Eiler (Region 4), Andrew Watkins (Region 5), Linnea Gabbard (Region 7), Pat Ford (Region 8)

Regional Alternates: Kathy Yeniscavich (Region 1), Martin Cowen (Region 2), Randall Daniel (Region 3), Otto Dassing (Region 5), Mark Tuniewicz (Region 6), Donovan Pantke (Region 7)

Absent: Joshua Clark (Region 4 Alternate), Joseph Ecklund (Region 6 Representative), Robley Hall (Region 8 Alternate), Joshua Smith (Vice-Chair)

Additional Attendees: None

The gallery contained many attendees as noted in the Registration Roster attached hereto as **Appendix A** comprising person who registered in advance, though not all of the registrants attended.

PURPOSE OF EXECUTIVE COMMITTEE MEETING

¹ Mr. Tuniewicz arrived after the initial attendance roll call.

The purpose of this meeting was to discuss updates on legal issues in some of our affiliates (Colorado, Massachusetts, Michigan, New Mexico, and Virginia) as well as staff updates.

EXECUTIVE SESSION

WITHOUT OBJECTION, the Executive Committee went into Executive Session at 6:21 p.m. p.m. with the rest of the LNC present for purposes of legal and staff updates. The LNC arose out of Executive Session at 10:09 p.m.

ADJOURNMENT

The Executive Committee adjourned for the day **WITHOUT OBJECTION** at 10:10 p.m.

Respectfully submitted,



LNC Secretary ~ Secretary@LP.org ~ 561.523.2250

APPENDIX A
LOG OF REGISTRANTS

APPENDIX A – LOG OF REGISTRANTS

REGISTRATION SHEET²

NAME
Sylvia Arrowwood
Tyler Bakken
Travis Bost
Time Buchanan
Andrew Chadderdon
Nickolas Ciesielski
Dean Davison
Christopher Deist
Stephen Ecker
Bryan Elliott
Brodi Elwood
Tim Hagan
Todd Hagopian
Wayne Harlos
Rick Heffelfinger
Michael Heise
Susan Hogarth
Sara Isenhour
Andrew Jacobs
Jonathan Jacobs
TJ Kosin
Jennifer Leatherbury
Travis Lerol
Matthew Lorence
Nathan Madden
Olga Maria
Ken Mattes
Irene Mavrakakis
Matt Murphy
Connor Nepomuceno
Michael Pakko

² The Zoom link required registration. This list comprises all persons who registered (with the exception of LNC members, staff, and other national Party representatives) but not everyone necessarily attended.

APPENDIX A
LOG OF REGISTRANTS

George Phillies
Aloysius Smart
Eric Thraen
Scott Ullery
Beth Vest
Daniel Ziemba

EXECUTIVE COMMITTEE MINUTES
LIBERTARIAN NATIONAL COMMITTEE
MARCH 8, 2023
VIA ZOOM



CURRENT STATUS: **FINAL**

PREPARED BY **CARYN ANN HARLOS**, LNC SECRETARY

TABLE OF CONTENTS

<u>OPENING CEREMONY</u>	4
CALL TO ORDER	4
<u>HOUSEKEEPING</u>	4
EXECUTIVE COMMITTEE MEMBER ATTENDANCE	4
REMAINING LNC MEMBER ATTENDANCE	4
OPPORTUNITY FOR PUBLIC COMMENT	4
<u>PURPOSE OF EXECUTIVE COMMITTEE MEETING</u>	5
<u>EXECUTIVE SESSION</u>	5
<u>ADJOURNMENT</u>	5
<u>TABLE OF APPENDICES</u>	5
APPENDIX A – LOG OF REGISTRANTS	6

LEGEND: *text to be inserted*, ~~text to be deleted~~, unchanged existing text, *substantive final main motions*.

All main substantive motions will be set off by *bold and italics in green font* (with related subsidiary and incidental motions *set off by highlighted italics*) and will be assigned a motion number comprising the date and a sequential number to be recorded in the Secretary's Main Motion/Ballot Tally record located at <https://tinyurl.com/LNCVotes2023>

Points of Order and substantive objections will be indicated in **BOLD RED TEXT**.

All vote results, challenges, and rulings will be set off by **BOLD ITALICS**.

The LPedia article for this meeting can be found at:
[https://lpedia.org/wiki/LNC Executive Committee Meeting 8 March 2023](https://lpedia.org/wiki/LNC_Executive_Committee_Meeting_8_March_2023)

Recordings for this meeting can be found at the LPedia link.

The QR codes lead to the video portion of the video being discussed.

OPENING CEREMONY

CALL TO ORDER

Chair Angela McArdle called the meeting to order at 9:08 p.m. (all times Eastern).

HOUSEKEEPING

EXECUTIVE COMMITTEE MEMBER ATTENDANCE

The following were in attendance:¹

Officers: Angela McArdle (Chair), Caryn Ann Harlos (Secretary), Todd Hagopian (Treasurer)

Non-Officers: Rich Bowen (At-Large), Bryan Elliott (At-Large)

REMAINING LNC MEMBER ATTENDANCE

At-Large Representatives: Dustin Blankenship, Mike Rufo

Regional Representatives: Dustin Nanna (Region 3), Carrie Eiler (Region 4), Mark Tuniewicz (Region 6), Linnea Gabbard (Region 7), Pat Ford (Region 8)

Regional Alternates: Kathy Yeniscavich (Region 1), Martin Cowen (Region 2), Otto Dassing (Region 5)

Absent: Dave Benner (Region 2 Representative), Joshua Clark (Region 4), Randall Daniel (Region 3 Alternate), Miguel Duque (Region 1 Representative), Robley Hall (Region 8 Alternate), Steven Nekhaila (At-Large), Donovan Pantke (Region 7), Andrew Watkins (Vice-Chair)

Staff: Lainie Huston (Executive Director)

The gallery contained many attendees as noted in the Registration Roster attached hereto as **Appendix A** comprising person who registered in advance, though not all of the registrants attended.

OPPORTUNITY FOR PUBLIC COMMENT

The following persons spoke during public comment:

¹ Mr. Hagopian and Mr. Ford arrived after the initial roll call.

- Bryan Elliott (AZ)

Secretary Harlos rose the issue of members of the LNC present that have not signed the NDA as required by the Policy Manual. Mr. Cowen indicated that he is not willing to sign the current NDA. The members of the Executive Committee moved to suspend the rules for this meeting with Secretary Harlos abstaining.

PURPOSE OF EXECUTIVE COMMITTEE MEETING

To discuss the following potential motions:

- To spend up to 10,000 to retain an attorney to assist in legal matters in Michigan, New Mexico and/or Massachusetts.
- Authorize the chair to file a trademark claim complaint regarding Michigan with an entity to be specified in executive session.

EXECUTIVE SESSION

WITHOUT OBJECTION, the Executive Committee went into Executive Session at 7:33 p.m. with the rest of the LNC and staff present for purposes of discussing the preceding motions and related issues.

ADJOURNMENT

The Executive Committee rose out of Executive Session adjourned for the day **WITHOUT OBJECTION** at 10:55 p.m.

TABLE OF APPENDICES

Appendix	Title	Author
A	Log of Registrants	Zoom

Respectfully submitted,



LNC Secretary ~ Secretary@LP.org ~ 561.523.2250

APPENDIX A
LOG OF REGISTRANTS

APPENDIX A – LOG OF REGISTRANTS

REGISTRATION SHEET²

<u>NAME</u>
Sylvia Arrowwood
Karen Bedonie
Phillip Bertin
Tyler Braaten
Andrew Chadderdon
Ben DeJong
Dave Franklin
Tim Hagan
Jonathan J. Jacobs
Nathan Madden
Trevor Step
Angela Thornton

² The Zoom link required registration. This list comprises all persons who registered (with the exception of LNC members, staff, and other national Party representatives) but not everyone necessarily attended.

EXECUTIVE COMMITTEE MINUTES
LIBERTARIAN NATIONAL COMMITTEE
APRIL 8, 2023
VIA ZOOM



PREPARED BY **CARYN ANN HARLOS**, LNC SECRETARY

TABLE OF CONTENTS

OPENING CEREMONY	4
CALL TO ORDER	4
HOUSEKEEPING	4
EXECUTIVE COMMITTEE MEMBER ATTENDANCE	4
REMAINING LNC MEMBER ATTENDANCE	4
OPPORTUNITY FOR PUBLIC COMMENT	4
PURPOSE OF EXECUTIVE COMMITTEE MEETING	5
EXECUTIVE SESSION	5
NEW BUSINESS WITH PREVIOUS NOTICE	5
MICHIGAN LITIGATION	5
ADJOURNMENT	5
TABLE OF NUMBERED MOTIONS/BALLOTS	6
TABLE OF APPENDICES	6
APPENDIX A – LOG OF REGISTRANTS	7

LEGEND: *text to be inserted*, ~~text to be deleted~~, unchanged existing text, *substantive final main motions*.

All main substantive motions will be set off by *bold and italics in green font* (with related subsidiary and incidental motions *set off by highlighted italics*) and will be assigned a motion number comprising the date and a sequential number to be recorded in the Secretary's Main Motion/Ballot Tally record located at <https://tinyurl.com/LNCVotes2023>

Points of Order and substantive objections will be indicated in **BOLD RED TEXT**.

All vote results, challenges, and rulings will be set off by **BOLD ITALICS**.

The LPedia article for this meeting can be found at:
[https://lpedia.org/wiki/LNC Executive Committee Meeting 8 April 2023](https://lpedia.org/wiki/LNC_Executive_Committee_Meeting_8_April_2023)

Recordings for this meeting can be found at the LPedia link.

The QR codes lead to the video portion of the video being discussed.

OPENING CEREMONY

CALL TO ORDER

Chair Angela McArdle called the meeting to order at 4:05 p.m. (all times Eastern).

HOUSEKEEPING

EXECUTIVE COMMITTEE MEMBER ATTENDANCE

The following were in attendance:

Officers: Angela McArdle (Chair), Andrew Watkins (Vice-Chair), Caryn Ann Harlos (Secretary), Todd Hagopian (Treasurer)

Non-Officers: Rich Bowen (At-Large), Steven Nekhaila (At-Large)

There was one vacancy on the Executive Committee.

REMAINING LNC MEMBER ATTENDANCE

At-Large Representatives: Dustin Blankenship

Regional Representatives: Dustin Nanna (Region 3), Mark Tuniewicz (Region 6), Pat Ford (Region 8)

Regional Alternates: Kathy Yeniscavich (Region 1), Martin Cowen (Region 2), Bill Hyman (Region 5), Bill Redpath (Region 6), Donovan Pantke (Region 7)

Absent: Dave Benner (Region 2 Representative), Joshua Clark (Region 4 Alternate), Randall Daniel (Region 3 Alternate), Otto Dassing (Region 5 Representative), Miguel Duque (Region 1 Representative), Carrie Eiler (Region 4 Representative), Linnea Gabbard (Region 7 Representative), Robley Hall (Region 8 Alternate), Mike Rufo (At-Large Representatives)

Staff: Lainie Huston (Executive Director)

Additional Attendees: Andrew Chadderdon, Chair of the Libertarian Party of Michigan

The gallery contained many attendees as noted in the Registration Roster attached hereto as **Appendix A** comprising person who registered in advance, though not all of the registrants attended.

OPPORTUNITY FOR PUBLIC COMMENT

There were no comments offered by the public.

PURPOSE OF EXECUTIVE COMMITTEE MEETING

The meeting was called to consider authorizing litigation in Michigan.

EXECUTIVE SESSION

WITHOUT OBJECTION, the Executive Committee went into Executive Session at 4:12 p.m. with the rest of the LNC, staff, and Mr. Chadderdon present to discuss legal strategy. Mr. Chadderdon was only present for a period of question and answers and departed the meeting afterwards.

The LNC arose out of Executive Session at 5:47 p.m.

NEW BUSINESS WITH PREVIOUS NOTICE

Michigan Litigation

Secretary Harlos moved to authorize filing of a trademark action in Michigan using the remaining allocated funds for the legal opinion plus an additional \$5,000 from budget line 8210-10.

A roll call vote was conducted with the following results:

Member	Yes	No	Abstain
Bowen	X		
Hagopian		X	
Harlos	X		
Nekhaila	X		
Smith	X		
McArdle	X		
TOTALS	5	1	0

This motion PASSED with a roll call vote of 5-1-0. [20230412-01]

ADJOURNMENT

The Executive Committee adjourned for the day **WITHOUT OBJECTION** at 5:52 p.m.

TABLE OF NUMBERED MOTIONS/BALLOTS

*Note that the master log of motions in 2023 can be found here: <https://tinyurl.com/LNCVotes2023>

ID#	Motion/Ballot	Result
20230408-01	Authorize Michigan trademark litigation.	PASSED

TABLE OF APPENDICES

Appendix	Title	Author
A	Log of Registrants	Zoom

Respectfully submitted,



LNC Secretary ~ Secretary@LP.org ~ 561.523.2250

APPENDIX XX
XXXXX

APPENDIX A – LOG OF REGISTRANTS

REGISTRATION SHEET¹

<u>NAME</u>
Dana Carver
Josh Hlavka
Susan Hogarth
Jonathan R. Jacobs
Tommie Lee
George Phillies
Hector Roos
Gregg Smith

¹ The Zoom link required registration. This list comprises all persons who registered (with the exception of LNC members, staff, and other national Party representatives) but not everyone necessarily attended.

Mises Caucus LNC Election Endorsements

LNC and Judicial Committee nominations and speeches can be made during the time that the previous vote is being counted.

Chair: Angela McArdle



Secretary: Caryn Ann Harlos

LIBERTARIAN PARTY
VISES
CAUCUS
Proudly endorses

Caryn Ann Harlos
for **Secretary**

LIBERTARIAN NATIONAL COMMITTEE

- Strong Advocate of Member Rights
- Holds Integrity as Highest Priority
- Unparalleled Work Ethic and Skillset

LIBERTARIAN NATIONAL COMMITTEE
Caryn Ann Harlos
Secretary

Treasurer: Todd Hagopian

LIBERTARIAN PARTY
VISES
CAUCUS
Proudly endorses

Todd Hagopian
for **Treasurer**

LIBERTARIAN NATIONAL COMMITTEE

- 20+ Years of Financial Analysis Experience
- Business Turnaround Expert
- Secured Ballot Access in Oklahoma

At-Large: Steven Nekhaila

LIBERTARIAN PARTY
MISES
CAUCUS
Proudly endorses

**Steven
Nekhaila**
for **At-Large**

LIBERTARIAN
NATIONAL COMMITTEE

- Business and Executive Experience
- Longstanding State Affiliate Leader
- Tenured LNC Member

At-Large: Rich Bowen

LIBERTARIAN PARTY
MISES
CAUCUS
Proudly endorses

**Rich
Bowen**
for **At-Large**

LIBERTARIAN
NATIONAL COMMITTEE

- Leadership Experience
- Bold & Fearless Messenger
- Wants to Make the LP Famous

At-Large: Michael Rufo



At-Large: Dustin Blankenship



At-Large: Bryan Elliott

LIBERTARIAN PARTY
MISES
CAUCUS
Proudly endorses

Bryan Elliott
for **At-Large**

LIBERTARIAN NATIONAL COMMITTEE

- Compelled to Activism After 35 years in Business
- Knows Organizational Long-Term Success
- Build Strong Foundation for a Larger LP

Regional 1 Representative:

LIBERTARIAN PARTY
MISES
CAUCUS
Proudly endorses

Miguel Duque
for **Region 1**
Representative

LIBERTARIAN NATIONAL COMMITTEE

- Business Leadership Recruiting & Training
- Over a Decade of Liberty Activism
- Humility, Integrity & Honesty

Regional 1 Alternate Representative:

LIBERTARIAN PARTY
WISES
CAUCUS
Proudly endorses

Kathy Yeniscavich
for **Region 1**
Representative Alternate

LIBERTARIAN NATIONAL COMMITTEE

- Zealous Representation of Region
- Accountability to Regional Membership
- Believes in Principle Over Politics

A promotional graphic for Kathy Yeniscavich, a woman with short blonde hair and glasses, wearing a grey top and a patterned cardigan. The graphic features the Libertarian Party WISES CAUCUS logo and the text 'Proudly endorses'. A blue box on the left contains her name and title. Three blue callout boxes on the right list her attributes: 'Zealous Representation of Region', 'Accountability to Regional Membership', and 'Believes in Principle Over Politics'. The Libertarian National Committee logo is at the bottom left.

Regional 2 Representative:

LIBERTARIAN PARTY
WISES
CAUCUS
Proudly endorses

Dave Benner
for **Region 2**
Representative

LIBERTARIAN NATIONAL COMMITTEE

- Principled Radical
- Experienced Messenger
- Advocate of Nullification

A promotional graphic for Dave Benner, a man with a beard and short hair, wearing a pinstriped suit jacket, white shirt, and red tie. The graphic features the Libertarian Party WISES CAUCUS logo and the text 'Proudly endorses'. A blue box on the left contains his name and title. Three blue callout boxes on the right list his attributes: 'Principled Radical', 'Experienced Messenger', and 'Advocate of Nullification'. The Libertarian National Committee logo is at the bottom left.

Regional 2 Alternate Representative:

LIBERTARIAN PARTY
WISES
CAUCUS
Proudly endorses

Martin Cowen
for **Region 2**
Representative Alternate

LIBERTARIAN NATIONAL COMMITTEE

- Libertarian for 50+ Years
- Property Rights Absolutist
- Ballot Access Plaintiff

A campaign graphic for Martin Cowen, a man with glasses in a suit and tie. The graphic features the WISES CAUCUS logo with a flame icon and the text 'LIBERTARIAN PARTY' and 'Proudly endorses'. A blue box contains his name and 'for Region 2 Representative Alternate'. The Libertarian National Committee logo is at the bottom left. Three blue callout boxes on the right list his credentials: 'Libertarian for 50+ Years', 'Property Rights Absolutist', and 'Ballot Access Plaintiff'.

Regional 3 Representative:

LIBERTARIAN PARTY
WISES
CAUCUS
Proudly endorses

Dustin Nanna
for **Region 3**
Representative

LIBERTARIAN NATIONAL COMMITTEE

- Fiercely Independent
- Making an Impact on Local Government
- Devoted to Representing All Members

A campaign graphic for Dustin Nanna, a man with a mustache in a suit. The graphic features the WISES CAUCUS logo with a flame icon and the text 'LIBERTARIAN PARTY' and 'Proudly endorses'. A blue box contains his name and 'for Region 3 Representative'. The Libertarian National Committee logo is at the bottom left. Three blue callout boxes on the right list his credentials: 'Fiercely Independent', 'Making an Impact on Local Government', and 'Devoted to Representing All Members'. He is wearing a small WISES CAUCUS pin on his lapel.

Regional 3 Alternate Representative:

LIBERTARIAN PARTY
WISES
CAUCUS
Proudly endorses

Connor Nepo
for **Region 3**
Representative
Alternate

LIBERTARIAN
NATIONAL COMMITTEE

- Radical
- Proven Results
- Hardworking

A campaign graphic for Connor Nepo, a man with glasses and a blue suit, smiling. The graphic features the Libertarian Party WISES Caucus logo and the text 'Proudly endorses'. Below the name 'Connor Nepo' is 'for Region 3 Representative Alternate' and the Libertarian National Committee logo. Three blue arrows point to the right, containing the words 'Radical', 'Proven Results', and 'Hardworking'.

Regional 5 Representative:

LIBERTARIAN PARTY
WISES
CAUCUS
Proudly endorses

Andrew Watkins
for **Region 5**
Representative

LIBERTARIAN
NATIONAL COMMITTEE

- Level-Headed
- Collaborative
- Attentive

A campaign graphic for Andrew Watkins, a man with a beard and a mustache, smiling. The graphic features the Libertarian Party WISES Caucus logo and the text 'Proudly endorses'. Below the name 'Andrew Watkins' is 'for Region 5 Representative' and the Libertarian National Committee logo. Three blue arrows point to the right, containing the words 'Level-Headed', 'Collaborative', and 'Attentive'.

Regional 5 Alternate Representative:

LIBERTARIAN PARTY
WISES
CAUCUS
Proudly endorses

Otto Dassing
for **Region 5**
Representative
Alternate

LIBERTARIAN
NATIONAL COMMITTEE

Hard Working and
Consistently Reliable

Staunchly Dedicated
to Truth and Liberty

Based

The graphic features a portrait of Otto Dassing, a man with a beard and a black cap, smiling. The background is yellow and blue. The text is arranged in a structured layout with various font sizes and weights.

Regional 6 Representative:

LIBERTARIAN PARTY
WISES
CAUCUS
Proudly endorses

Joseph Ecklund
for **Region 6**
Representative

LIBERTARIAN
NATIONAL COMMITTEE

A Natural
Bridge Builder

Farm, Food & Health
Freedom Fighter

Empathetic and
Rational

The graphic features a portrait of Joseph Ecklund, a man with a beard, looking directly at the camera. The background is yellow and blue. The text is arranged in a structured layout with various font sizes and weights.

Regional 6 Alternate Representative:

LIBERTARIAN PARTY
WISES
CAUCUS
Proudly endorses

Tim GIBLIN
for **Region 6**
Representative
Alternate

LIBERTARIAN
NATIONAL COMMITTEE

- Professional Organizer
- Operations Minded
- Motivation Through Action

Regional 7 Representative:

LIBERTARIAN PARTY
WISES
CAUCUS
Proudly endorses

Linnea GABBARD
for **Region 7**
Representative

LIBERTARIAN
NATIONAL COMMITTEE

- Steadfast Liberty Values
- Innovative Activism
- Strong Team Cooperation

Regional 8 Representative:

LIBERTARIAN PARTY
WISES
CAUCUS
Proudly endorses

Pat Ford
for **Region 8**
Representative

LIBERTARIAN NATIONAL COMMITTEE

- Unapologetically Libertarian
- Civilly Disobedient
- Taking Liberty to the Streets

A campaign graphic for Pat Ford, a man with glasses and a suit, set against a yellow and blue background. The graphic includes the Libertarian Party WISES CAUCUS logo, the text 'Proudly endorses', and a blue box with his name and 'for Region 8 Representative'. Below this is the Libertarian National Committee logo and three blue callout boxes with his campaign promises.

Regional 8 Alternate Representative:

LIBERTARIAN PARTY
WISES
CAUCUS
Proudly endorses

Robley Hall
for **Region 8**
Representative Alternate

LIBERTARIAN NATIONAL COMMITTEE

- Will Protect the Interests of Members
- Promote the LP in State & Local Elections
- Spread the Message & Increase Membership

A campaign graphic for Robley Hall, a man with long white hair and a beard, set against a yellow and blue background. The graphic includes the Libertarian Party WISES CAUCUS logo, the text 'Proudly endorses', and a blue box with his name and 'for Region 8 Representative Alternate'. Below this is the Libertarian National Committee logo and three blue callout boxes with his campaign promises.

To the Libertarian Party of Michigan,

It is with great sadness that I write you today. I had every intention of finishing out my term as chair regardless of what was predicted to happen at our national convention. Unfortunately, now that the event has come and gone, what I saw that weekend made it very clear that my party has left me. It was my commitment and desire to serve my full term, giving it 100% of my available energies that caused me to ignore the signs right in front of me and hold out longer than I feel I should have.

I condemn bigotry as irrational and repugnant. I have walked away from friends and even family members when I saw such vile behavior from them and will continue to do so for the rest of my days. It is a cancer and I want no part of it. Up until Memorial weekend, the political party I dedicated dollars and countless hours of volunteer effort was there standing against it with me. It was important to me that the organization not only stood for freedom, but also against bigotry. Since 2008, the national platform stated that it was irrational and repugnant and we had a party that stood by that statement. However, in May, the national delegation decided to soften the language and make it kinder. I am not okay with that. And as of Monday night, my state leadership decided to reinforce the stance made in Reno on the matter. I am not okay with that.

Let me also say, the act of changing the language and removing the term 'bigotry' from our platform was not nearly as troubling as the celebration in the room the moment the change was officially adopted. Yes, somewhere around 600 to 700 delegates vigorously celebrated having harsh language against bigots removed from our official platform! This is the moment I realized my party had left me.

Since that time, I have seen tweets from my own state members about how they wish they could move to New Hampshire to help a blatantly bigoted candidate there win his election. I've listened as other members defend this particular candidate by saying "he also has a lot of good things to say!" All the while, no one in the newly installed national leadership seems to want to speak out against this candidate or distance themselves from his rhetoric. His messaging is irrational and repugnant. And he is being allowed to continue spewing his bigotry under the Libertarian banner and even be propped up by people from whom I expected better. Unfortunately, he is not the only one being allowed to do this. It is also unfortunate that our newly elected national chair has been silent regarding this type of bigotry, but has droned on and on about "wokeness" and how woke people are not wanted in our organization. Quite honestly, I would take the woke over the bigoted, all day, every day.

The national party is heading off a cliff and I no longer have state leadership who are willing to help me unhitch our affiliate before it pulls us down with it. They all resigned yesterday. All but me and my 1st vice chair and dear friend, Ben Boren. I avoided making this public until I had spoken with him about my intent. Turns out we are both on the same page. With that, we turn the gavel, figuratively, over to your 2nd vice chair.

Before I bid farewell, I feel compelled to say a little about the one now in charge of the LPM. I strongly advise those who remain in the state party to make his time as interim chair as brief as possible. Out of necessity he will likely have to chair the upcoming convention. But at that point, he should be done serving as my replacement. I also encourage you to avoid electing him to anything in the future. Andrew Chadderdon is divisive and hateful towards anyone who would challenge or criticize him or his precious caucus. He also has proven, time and again, that he is incapable of putting party priorities ahead of those of his faction. I supported his run for his current seat and I now regret that decision. He has already alienated, attacked, and run off several of our best volunteers. The delegation in the upcoming convention would do well to elect a chair and 1st vice chair who will continue our trend of standing up to his bullying and reprehensible conduct. I did not want to muddy the waters by speaking ill of anyone here and especially by calling them out by name, but I feel it necessary to make this exception because of the venom he has spewed on a regular basis. Consider yourself warned!

I have come to love, appreciate, and respect so many in this party. To practically all of you, I hope that my departure will not mean the end of our cooperation and our friendship. I trust my path will cross with your paths many times in the coming years. I commend each one of you for standing with me in this battle against the ever-expanding state. Much love! Tim Yow

**ROBERT'S RULES
OF ORDER
NEWLY REVISED**

12TH EDITION



GENERAL HENRY M. ROBERT
U.S. Army

A New and Enlarged Edition by
SARAH CORBIN ROBERT
HENRY M. ROBERT III
WILLIAM J. EVANS
DANIEL H. HONEMANN
THOMAS J. BALCH
DANIEL E. SEABOLD
SHMUEL GERBER

PUBLICAFFAIRS
New York

9:1

ROBERT'S RULES OF ORDER NEWLY REVISED

pro tem to hold office beyond the current session (in the case of illness or disability of both the regular presiding officer and his alternate), notice must be given at the preceding meeting or in the call of the meeting that elects him. One session must not interfere with the freedom of each new session to elect its own chairman pro tem except by an election held with previous notice (10:44–51).

§9. PARTICULAR TYPES OF BUSINESS MEETINGS

Regular Meeting

9:1 The term *regular meeting* (or *stated meeting*) refers to a periodic business meeting of a permanent society, local board, or board, held at weekly, monthly, quarterly, or similar intervals, for which the day (as, “the first Tuesday of each month”) should be prescribed by the bylaws and the hour and place should be fixed by a standing rule.

9:2 If, instead, an organization follows the practice of changing the day, hour, or place of its regular meetings by resolution, notice (also referred to as the call of the meeting) must be sent to all members a reasonable time in advance of each regular meeting.

9:3 In any organization, notice must be sent a reasonable time in advance of each regular meeting that is separated by more than a quarterly time interval (see 9:7 below) from the preceding regular meeting. Notice must also be sent a reasonable time in advance of a convention of delegates. In many organizations, a call is sent to all members in advance of each meeting.

9:4 In all such cases, to avoid uncertainty about what amount of notice in advance is reasonable, the specific number of days of notice required—which will depend on the conditions of the particular regular assembly and which each organization must determine for itself—should be prescribed in the bylaws (56:31). If otherwise provided in the bylaws, the number of days of notice is computed by counting all calendar days (including holidays and

§9 TYPES OF BUSINESS MEETINGS

9:8

weekends), excluding the day of the meeting but including the day the notice is sent.

When notice is required to be sent, unless a different standard is specified that requirement is met if written notice is sent to each member either:

- a) by postal mail to the member’s last known address; or
- b) by a form of electronic communication, such as e-mail or fax, by which the member has agreed to receive notice.

Each regular meeting normally completes a separate session, as explained in 8:4 (see *Adjourned Meeting*, 9:17–19 below, however). Some societies have frequent meetings for social or cultural purposes at which business may be transacted, and also hold a session every month or quarter especially for business. In such societies, the term *regular meeting* applies particularly to the regular business session.

Important rules relating to the continuance of a question from one session to the next depend on whether *no more than a quarterly time interval* intervenes between the two sessions. In this book, it is understood that no more than a quarterly time interval intervenes between two sessions if the second session begins at any time during or before the third calendar month after the calendar month in which the first session ends. For example, with reference to a session held in January, no more than a quarterly time interval has elapsed since the previous session if that session ended on or after October 1st of the preceding calendar year; and no more than a quarterly time interval will elapse before the next session if that session will begin on or before April 30th of the current year.

If two business sessions are separated by *more than a quarterly time interval*—or if the term of a specified portion of the membership expires before the start of the later session (as may happen in an elected legislative assembly or in a board)—then business can go over from the earlier session to the later one only by means of referral to a committee (13).

9:9

ROBERT'S RULES OF ORDER NEWLY REVISED

9:9 If two consecutive regular business sessions are separated by *no more than a quarterly time interval*, then—provided there is no specified portion of the membership whose term expires before the start of the later session—there are several ways in which business can go over from the earlier session to the later one:³

- 1) by being postponed to, or otherwise set as a general or special order for, the later session (see 14, 41);
- 2) by being laid on the table (17) at the earlier session and taken from the table (34) before that session adjourns;
- 3) by going over to the later session as unfinished business or as an unfinished special order (see 21:7(b), 41:18–23);
- 4) by being the subject of a motion to *Reconsider* (37) that is not finally disposed of at the earlier session; and
- 5) by being referred to a committee (13) that can report at the later session.

9:10 The only way for business to be carried over directly from one session to some later regular session *beyond* the next regular business session is by being referred to a committee that can report at that later session.

9:11 When a question is carried over from one session to another by any of the above processes, it remains *within the control of the assembly* as a question that has been *temporarily, but not finally, disposed of*.

9:12 Any business that falls within the objects of the society defined in its bylaws (or, in the case of a board, any business within the authority of the board) can be transacted at

3. It should be noted that if some, but not all, of an organization's regular business sessions are separated by no more than quarterly time intervals, it is only between meetings which are that close together that a question can go over from one session to the next by any means other than referral to a committee. If a society holds regular monthly business meetings from September through May, for example, but does not meet during the summer, a question can be postponed until the next meeting of any of the meetings from September through April, but such a question cannot be postponed at the May meeting until the September meeting.

§9 TYPES OF BUSINESS MEETINGS

9:14

regular meeting (provided that the parliamentary rules relating to action already taken, or to matters not finally disposed of and remaining within the control of the assembly, are complied with in cases where they apply; compare 10:26–27; see also 35 and 38).

Special Meeting

11 A *special meeting* (or *called meeting*) is a separate session of a society held at a time different from that of any regular meeting, and convened only to consider one or more items of business specified in the call of the meeting. Notice of the time, place, and purpose of the meeting, clearly and specifically describing the subject matter of the motions or items of business to be brought up, must be sent to all members a reasonable number of days in advance. The reason for special meetings is to deal with matters that may arise between regular meetings and that require action by the society before the next regular meeting, or to dedicate an entire session to one or more particular matters.⁴ As in the case of a regular meeting, the session of a special meeting in an ordinary society is normally concluded in a single meeting, unless the assembly at the special meeting schedules an adjourned meeting (see below).

11 Special meetings can properly be called only (a) as authorized in the bylaws (see 56:36); or (b) when authorized by the assembly itself, as part of formal disciplinary procedures, for purposes of conducting a trial and determining a punishment (see 63:21n9). A section of the bylaws that authorizes the calling of special meetings should prescribe:

- 1) by whom such a meeting is to be called—which provision is usually in the form of a statement that the president (or, in large organizations, the president with the approval of

4. If a special meeting intervenes between two regular meetings, that does not affect the rules governing whether and how business can go over from the earlier meeting to the later regular meeting.

38:8

ROBERT'S RULES OF ORDER NEWLY REVISED

- 3) A *Call for the Orders of the Day* can be renewed after disposal of the business that was taken up when the assembly refused to proceed to the orders of the day.
- 4) A motion to *Adjourn* or to *Recess* can be renewed after material progress in business or in debate—such as an important decision or speech. A vote on a motion to *Recess* or to *Lay on the Table* is not business of a character to justify renewal of a motion to *Adjourn*; and a vote on any of these three motions is not sufficient business to allow renewal of either of the others.
- 5) Motions to close nominations or the polls can be renewed after progress in nominations or voting has been such as to make them essentially new questions.

Conditions That May Impede Renewal at a Later Session

38:8 **Main Motions That Go Over to Another Session; Motions Without the Control of the Assembly, Because Not Finally Disposed of.** Referring to the second general principle stated in 38:1, a main motion that was introduced but not adopted during the current session can, except as noted in this paragraph, be renewed at any later session unless it has become absurd. Such exceptions occur only through one of the processes by which, from one session to another, a main motion can remain *within the control of the assembly* (that is, *temporarily, but not finally, disposed of*) so that *the same* motion can be considered at the later session. Four of these processes (numbered 1 through 4 below) arise only in cases of organizations where no more than a quarterly time interval (see 9:7) will elapse until the next session. In such societies, a main motion cannot be renewed during the next session after a session at which it was

- 1) postponed to, or otherwise set as a general or special order for, the next session (14, 41);
- 2) allowed to go over to the next session as unfinished business or as an unfinished special order (see 21:7(b), 41:1, 41:21–24);

§39 DILATORY AND IMPROPER MOTIONS

39:3

- 3) laid on the table and not taken from the table (17, 34); or
- 4) the subject of a motion to *Reconsider* (37) that was made but not finally disposed of.

Also, in any assembly:

- 5) a main motion that has been referred to a committee cannot be renewed until after the session at which the assembly finally disposes of the main motion—after the committee has reported it back or has been discharged from its consideration (36).

Nonrenewability of Unsustained Objection to the Consideration of a Question. An unsustained *Objection to the Consideration of a Question* (26) cannot be renewed in connection with the same main motion—even at a later session if the main motion goes over to that session through one of the processes stated immediately above. By deciding to consider the question, the assembly has already begun its involvement, and it is too late to make an objection. But if an original main motion is finally disposed of at one session without being adopted and is renewed at a later session, it is then a new motion and its consideration can be objected to, subject to the usual rules.

DILATORY AND IMPROPER MOTIONS

Dilatory Motions

A motion is *dilatory* if it seeks to obstruct or thwart the will of the assembly as clearly indicated by the existing parliamentary situation.

Parliamentary forms are designed to assist in the transaction of business. Even without adopting a rule on the subject, every deliberative assembly has the right to protect itself from the abusive use of these forms.

Any main or other motion that is frivolous or absurd or that contains no rational proposition is dilatory and cannot be introduced. As further examples, it is dilatory to obstruct

39:4

ROBERT'S RULES OF ORDER NEWLY REVISED

business by appealing from a ruling of the chair on a question about which there cannot possibly be two reasonable opinions by demanding a division (29) on a vote even when there has been a full vote and the result is clear, by moving to lay on the table the matter for which a special meeting has been called, by constantly raising points of order and appealing from the chair's decision on them, or by moving to adjourn again and again when nothing has happened to justify renewal of a motion. By use of such tactics, a minority of two or three members could bring business to a standstill.

39:4 It is the duty of the presiding officer to prevent members from misusing the legitimate forms of motions, or abusing the privilege of renewing certain motions, merely to obstruct business. Whenever the chair becomes convinced that one or more members are repeatedly using parliamentary forms for dilatory purposes, he should either not recognize these motions or he should rule that such motions are not in order. He should never adopt such a course merely to *speed up* business, and he should never permit his personal feelings to affect his judgment in such cases. If the chair only *suspects* that a motion is not made in good faith, he should give the maker of the motion the benefit of the doubt. The chair should always be courteous and fair, but at the same time he should be vigilant in protecting the assembly from imposition.

§39 DILATORY AND IMPROPER MOTIONS

39:7

unless adopted by the vote required to rescind or amend the motion previously adopted.

Motions are also improper when they present practically the same question as a motion previously decided at the same session. In addition, motions are improper that conflict with, or present practically the same question as, one still within the control of the society because not finally disposed of (see 9:7-11, 38:8). If a conflicting motion were allowed in such cases, it would interfere with the freedom of the assembly in acting on the earlier motion when its consideration is resumed.

No motion can be introduced that is outside the object of the society as defined in the corporate charter, constitution, or bylaws (see 56:18), unless by a two-thirds vote the assembly agrees to its consideration (see 10:26(2)). Except as may be necessary in the case of a motion of censure or a motion related to disciplinary procedures (61, 63), a motion must not use language that reflects on a member's conduct or character, or is discourteous, unnecessarily harsh, or not allowed in debate (see 43).

Improper Motions

39:5 Motions that conflict with the corporate charter, constitution, or bylaws of a society, or with procedural rules promulgated by national, state, or local laws, are not in order,¹ and if a motion of this kind is adopted, it is null and void. Likewise, motions from motions to *Rescind* or to *Amend Something Previously Adopted* (35), motions are not in order if they conflict with one or more motions previously adopted at any time when they are in force. Such conflicting motions, if adopted, are null and void.

1. However, see 10:26(1) and the footnote there for exceptions.

50:1

ROBERT'S RULES OF ORDER NEWLY REVISED

The individual replacement of persons who may occasionally vacate board membership at other times, however, does not have these effects.

§50. COMMITTEES

50:1

A committee, as understood in parliamentary law, is a body of one or more persons, elected or appointed by (or by the action of) an assembly or society, to consider, investigate, or take action on certain matters or subjects, or to do all or some of these things. Unlike a board, a committee is not itself considered to be a form of assembly.

50:2

Although the term *committee* commonly implies a small number of persons appointed to give a task more attention than is possible in a body the size of the assembly, this characteristic more accurately describes what are known as *ordinary committees*. An assembly can also designate all of its members present to act as a committee, which is called a *committee of the whole* and is distinguished from an ordinary committee. In large assemblies, the use of a committee of the whole is a convenient method of considering a question when it is desirable to allow each member to speak an unlimited number of times in debate. Committees of the whole are treated separately in §52. The statements in this section apply principally to ordinary committees.

50:3

Ordinary committees are of two types—*standing committees* (which have a continuing existence) and *special committees* (which go out of existence as soon as they have completed their specified task).

50:4

Generally the term *committee* implies that, within the limits of its assigned responsibilities, the committee has less authority to act independently for the society (or other organization) than a board is usually understood to have. If the committee is to do more than report its findings and recommendations to the assembly, it may be empowered to act for the society only on specific instructions; or, if it is to have

§50 COMMITTEES

50:8

standing powers, its actions may be more closely subject to review than a board's, or it may be required to report more fully. Also, unlike most boards, a committee in general does not have regular meeting times established by rule; but meetings of the committee are called as stated in 50:21–22. Some standing committees, however—particularly in large state or national organizations—function virtually in the manner of boards, although not designated as such.

When a committee is appointed “with power,” this means with power to take all the steps necessary to carry out its instructions.

In large assemblies or those doing a great volume of business, much of the preliminary work in the preparation of subjects for consideration is usually done by committees. In many such bodies, in fact, it is advisable to have every main question go to a committee before final action on it is taken by the assembly.

Standing committees are constituted to perform a continuing function, and remain in existence permanently or for the life of the assembly that establishes them. In an ordinary society, the members of such a committee serve for a term corresponding to that of the officers, or until their successors have been chosen, unless the bylaws or other rules otherwise expressly provide. Thus, a new body of committee members is normally appointed at the beginning of each administration.

A standing committee must be constituted by name (a) by a specific provision of the bylaws or (b) by a resolution which is in effect a special rule of order and therefore requires for its adoption either previous notice and a two-thirds vote or a vote of a majority of the entire membership, if any of the following conditions are to apply:

- if the committee is to have standing authority to act for the society on matters of a certain class without specific instructions from the assembly;
- if all business of a certain class is to be automatically referred to the committee; or

Independent Political Report



June 29, 2023

Author: George Phillies



[LNC Sues Michigan Libertarians; Michigan Libertarians Respond](#)

by [George Phillies](#) ⌚ [May 8, 2023](#)

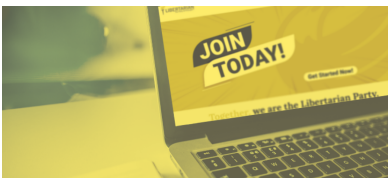
The Libertarian National Committee has filed a trademark suit against the Libertarian Party of Michigan. Their full filing may be found here. This is the sec... [Read more.](#)



[LNC Meeting May 7, 2023](#)

by [George Phillies](#) ⌚ [May 7, 2023](#)

Now with the late-evening segment. They are calling the meeting to order and taking roll. LPCA Chair says that LPCA examined civicism, concluded it would not w... [Read more.](#)



[Robert Kraus Resigns from LNC Staff](#)

by [George Phillies](#) ⌚ [May 6, 2023](#)

In a letter to LNC Chair Angela McArdle, Robert Kraus announced that he will be leaving the LNC on June 15, 2023. In January, he had proposed a new contract.&nb... [Read more.](#)



[McArdle's Complaint Against Michigan](#)

by [George Phillies](#) ⌚ [April 29, 2023](#)

Independent Political Report has been supplied by a public source with a copy of the Libertarian National Committee complaint against a Michigan Libertarian Par... [Read more.](#)



[Editorial: What Should We Do?](#)

by [George Phillies](#) ⌚ [April 28, 2023](#)

“What should we do” is the new op-ed column of our sister site ThirdPartyWatch. “What Should We Do” is open to writers of all third parties and independ... [Read more.](#)



[LNC Chair McArdle Files FEC Complaint](#)

by [George Phillies](#) ⌚ [April 26, 2023](#)

Breaking News!: We have a report from a recent candidate of the Libertarian Party in Michigan that the McArdle complaint was directed against one of the Michiga... [Read more.](#)



[LP Classical Liberal Caucus to Meet](#)

by [George Phillies](#) ⌚ [April 21, 2023](#)

Statement from the LP Classical Liberal Caucus (LP-CLC) Discord site: In June we will be releasing a report on the health of the LP, which is one full year f... [Read more.](#)



[LNC Income Continues Low](#)

by [George Phillies](#) ⌚ [April 20, 2023](#)

The income of the Libertarian National Committee continues to be at a very low level. The total income was \$78,205 for March. That includes \$55,430 in unitemize... [Read more.](#)



[Interview with Reform Party Chairman Nicholas Hensley](#)

by [George Phillies](#) ⌚ [April 18, 2023](#)

Ten Questions with Reform Party Chairman Nicholas Hensley
March 2023 Nicholas Hensley is the current chairman of the Reform Party of the United States. His te... [Read more.](#)



[Editorial: Organizing for the Future](#)

by [George Phillies](#) ⌚ [April 15, 2023](#)

I call the attention of readers to Richard Viguerie’s new book “Go Big” on marketing political propositions (A paperback copy of the book can... [Read more.](#)

Source	Date	First Name	Last Name	City	State	Amount
CC / Webpage LNCFIGHT.ORG	6/26/23	Derek	Strelow	Toledo	OH	\$50.00
CC / Webpage LNCFIGHT.ORG	6/22/23	Keith	Thompson	Pineville	LA	\$25.00
CC / Webpage LNCFIGHT.ORG	6/22/23	Dean	Peterson	Pensecola	FL	\$25.00
CC / Webpage LNCFIGHT.ORG	6/21/23	Kerri	Pocock	Tampa	FL	\$10.00
CC / Webpage LNCFIGHT.ORG	6/21/23	Eric	Finkenbiner	Seattle	WA	\$100.00
CC / Webpage LNCFIGHT.ORG	6/21/23	David_E	Blau	Walpole	MA	\$50.00
LawPay / Direct to Attorney Curcio	6/21/23	Lisa	Gioia	Milford	MI	\$200.00
CC / Webpage LNCFIGHT.ORG	6/20/23	Susan	Hogarth	Raleigh	NC	\$25.00
CC / Webpage LNCFIGHT.ORG	6/19/23	Jodi	Cole	Cypress	TX	\$25.00
CC / Webpage LNCFIGHT.ORG	6/18/23	Steven_L	Gallant	Arvada	CO	\$50.00
CC / Webpage LNCFIGHT.ORG	6/18/23	Donna	Gundle-Krieg	Mancelona	MI	\$300.00
CC / Webpage LNCFIGHT.ORG	6/17/23	Lee	Schultheiss	Battle Creek	MI	\$25.00
CC / Webpage LNCFIGHT.ORG	6/17/23	Eric_M	Thraen	Hastings	MN	\$50.00
CC / Webpage LNCFIGHT.ORG	6/4/23	Aaron	Miranov	Clinton Twp	MI	\$37.00
CC / Webpage LNCFIGHT.ORG	5/18/23	Joe	Puleo	Sterling Heights	MI	\$10.00
CC / Webpage LNCFIGHT.ORG	5/18/23	Valerie	Sarwark	Manchester	NH	\$50.00
CC / Webpage LNCFIGHT.ORG	5/17/23	Stephanie	Dunn	Mt Pleasant	MI	\$50.00
CC / Webpage LNCFIGHT.ORG	5/15/23	Jami	VanAlstine	Romulus	MI	\$25.00
Anedot / Legal Fund Page	5/11/23	Patricia	Barnum	Saint Paul	MN	\$25.00
Anedot / Legal Fund Page	5/10/23	Brian	Leach	Fort Smith	AR	\$50.00
Anedot / Legal Fund Page	5/10/23	Douglas	Reissner	Township	MI	\$25.00
Anedot / Legal Fund Page	5/10/23	Rebecca	Stempfle	Southfield	MI	\$50.00
Anedot / Legal Fund Page	5/10/23	Carol	Unsicker	HOUSTON	TX	\$25.00
Anedot / Legal Fund Page	5/9/23	Daniel	Krause	Matawan	NJ	\$100.00
Anedot / Legal Fund Page	5/9/23	Richard	Longstreth	Corryton	TN	\$100.00
Anedot / Legal Fund Page	5/9/23	Derek	Maddox	Hurt	VA	\$10.00
Anedot / Legal Fund Page	5/9/23	Jennifer	Moore	Mont Clare	PA	\$25.00
Anedot / Legal Fund Page	5/9/23	John	Shuey	Watkinsville	GA	\$25.00
Anedot / Legal Fund Page	5/9/23	Danielle	Siler	Seattle	WA	\$100.00
Anedot / Legal Fund Page	5/8/23	Andy	Craig	MILWAUKEE	WI	\$25.00
Anedot / Legal Fund Page	5/8/23	Kelley	Curran	Jeffersonville	IN	\$25.00
Anedot / Legal Fund Page	5/8/23	Brian	Doss	Montpelier	VA	\$25.00
Anedot / Legal Fund Page	5/8/23	Andrew	Duke	Battle Creek	MI	\$50.00
Anedot / Legal Fund Page	5/8/23	Steven	Gallant	Arvada	CO	\$50.00
Anedot / Legal Fund Page	5/8/23	Stephen	Hern	Cleveland	OH	\$50.00
Anedot / Legal Fund Page	5/8/23	Andrew	Jernigan	Richmond	VA	\$20.00
Anedot / Legal Fund Page	5/8/23	Andrew	Johns	North Ogden	UT	\$25.00
Anedot / Legal Fund Page	5/8/23	Derek	Newhall	South Yarmouth	MA	\$100.00
Anedot / Legal Fund Page	5/8/23	Joseph	Sabin	Herkimer	NY	\$10.00
Anedot / Legal Fund Page	5/8/23	Emily	Salvette	Ann Arbor	MI	\$500.00
Anedot / Legal Fund Page	5/8/23	Cory	Sanin	Sun Prairie	WI	\$10.00
LawPay / Direct to Attorney Curcio	5/8/23	Lisa	Gioia	Milford	MI	\$250.00
Anedot / Legal Fund Page	5/1/23	Brooks	Lester	Dinwiddie	VA	\$26.00
Anedot / Legal Fund Page	5/1/23	Kerri	Pocock	Tampa	FL	\$25.00

Anedot / Legal Fund Page	5/1/23	Jami	Van Alstine	Romulus	MI	\$50.00
Anedot / Legal Fund Page	4/30/23	Eric	Thraen	Hastings	MN	\$50.00
Anedot / Legal Fund Page	4/29/23	John	Barfield	Orange City	FL	\$25.00
Anedot / Legal Fund Page	4/14/23	Richard	Edgar	Cream Ridge	NJ	\$20.00
Anedot / Legal Fund Page	4/12/23	Catherine	Filus	Clinton Twp	MI	\$100.00
Anedot / Legal Fund Page	4/12/23	Chris	Luchini	White Rock	NM	\$500.00
Anedot / Legal Fund Page	4/11/23	Jodi	Cole	Cypress	TX	\$25.00
Anedot / Legal Fund Page	4/11/23	Stephen	Meier	Federal Way	WA	\$100.00
Anedot / Legal Fund Page	4/10/23	Cassaundra	Fryman	Plymouth	OH	\$20.00
Anedot / Legal Fund Page	4/10/23	Joseph	Henchman	Washington	DC	\$50.00
Anedot / Legal Fund Page	4/10/23	Nate	Herd	Milan	MI	\$50.00
Anedot / Legal Fund Page	4/10/23	James	Jones	Waverly	OH	\$200.00
Anedot / Legal Fund Page	4/10/23	Thomas	Knapp	Gainesville	FL	\$10.00
Anedot / Legal Fund Page	4/10/23	Victor	Kocher	Columbia	SC	\$25.00
Anedot / Legal Fund Page	4/10/23	Laura	Lane	Bay Minette	AL	\$50.00
Anedot / Legal Fund Page	4/10/23	Michael	Lopez	Dayton	OH	\$100.00
Anedot / Legal Fund Page	4/10/23	Patricia	McMahon	littleton	CO	\$100.00
Anedot / Legal Fund Page	4/10/23	Timothy	McMaster	York	PA	\$25.00
Anedot / Legal Fund Page	4/10/23	Jonathan	Read	Falmouth	ME	\$25.00
Anedot / Legal Fund Page	4/10/23	Roderick	Riensch	Silverlake	WA	\$25.00
Anedot / Legal Fund Page	4/10/23	Joe	White	Houston	TX	\$100.00
Anedot / Legal Fund Page	4/9/23	Stephanie	Berlin	San Antonio	TX	\$100.00
Anedot / Legal Fund Page	4/9/23	Michael	Bishop	Brownsburg	IN	\$25.00
Anedot / Legal Fund Page	4/9/23	Craig	Bowden	HYRUM	UT	\$10.00
Anedot / Legal Fund Page	4/9/23	Matthew	Clark	Overland Park	KS	\$25.00
Anedot / Legal Fund Page	4/9/23	Jessi	Cowart	Conroe	TX	\$25.00
Anedot / Legal Fund Page	4/9/23	Shawn	Curtis	Salt Lake City	UT	\$25.00
Anedot / Legal Fund Page	4/9/23	Brian	DeYoung	Manton	MI	\$25.00
Anedot / Legal Fund Page	4/9/23	Kevin	Gaughen	Mechanicsburg	PA	\$250.00
Anedot / Legal Fund Page	4/9/23	Aaron	Goss	Canyon Lake	TX	\$10.00
Anedot / Legal Fund Page	4/9/23	Susan	Hogarth	Raleigh	NC	\$60.00
Anedot / Legal Fund Page	4/9/23	David	Holman	Hesperia	CA	\$25.00
Anedot / Legal Fund Page	4/9/23	Kevin	Kahn	Exeter	NH	\$50.00
Anedot / Legal Fund Page	4/9/23	Whitney	Masterson-Moyes	Kingsbury	TX	\$10.00
Anedot / Legal Fund Page	4/9/23	Jennifer	Moore	Mont Clare	PA	\$50.00
Anedot / Legal Fund Page	4/9/23	Steven	Perkins	Etna	OH	\$250.00
Anedot / Legal Fund Page	4/9/23	Joseph	Sabin	Herkimer	NY	\$10.00
Anedot / Legal Fund Page	4/9/23	Steve	Scheetz	Langhorne	PA	\$200.00
Anedot / Legal Fund Page	4/9/23	Cara	Schulz	Burnsville	MN	\$50.00
Anedot / Legal Fund Page	4/9/23	Amber	Sczuroski	Las Vegas	NV	\$50.00
LawPay / Direct to Attorney Curcio	4/8/23	Jay	Gillotte	Lyons	MI	\$1,000.00
Paypal /Membership Link	4/2/23	Frederick	Horndt	Warren	MI	\$250.00
Check / Convention Fundraiser	4/1/23	David	Canny	Linden	MI	\$145.00
Credit Card / Convention On Site	4/1/23	Rena	Coon	Carsonville	MI	\$70.00
Check / Convention Fundraiser	4/1/23	Bill	Gelineau	Lowell	MI	\$250.00

Check / Convention Fundraiser	4/1/23	Jay	Gillotte	Lyons	MI	\$300.00
Credit Card / Convention On Site	4/1/23	Arthur	Gulick	Chelsea	MI	\$35.00
Credit Card / Convention On Site	4/1/23	Andrew	Hall	Rockford	MI	\$80.00
Credit Card / Convention On Site	4/1/23	Tim	O'Brien	Imlay City	MI	\$70.00
Credit Card / Convention On Site	4/1/23	Rafael	Wolf	Kalamazoo	MI	\$25.00
Paypal / Convention Regis	3/30/23	Justin	Thompson	Brighton	MI	\$25.00
Paypal / Convention Regis	3/28/23	rafael	wolf	Kalamazoo	MI	\$25.00
Paypal / Convention Regis	3/27/23	John	Hargenrader	Livonia	MI	\$105.00
Paypal / Convention Regis	3/27/23	Kenneth	Proctor	Charlotte	MI	\$180.00
Paypal / Convention Regis	3/27/23	David	Westerhof	Grand Rapids	MI	\$85.00
Paypal / Convention Regis	3/27/23	Michael	Yanok	Clinton Twp	MI	\$85.00
Paypal / Convention Regis	3/24/23	Andrew	Duke	Battle Creek	MI	\$85.00
Paypal / Convention Regis	3/21/23	Ronald	Muszynski	Grass Lake	MI	\$85.00
Paypal / Convention Regis	3/20/23	adam	childress	Flushing	MI	\$25.00
Paypal / Convention Regis	3/19/23	Mary	Buzuma	Grand Haven	MI	\$250.00
Paypal / Convention Regis	3/18/23	Jerry	Bloom	Troy	MI	\$10.00
Paypal / Convention Regis	3/18/23	Jami	VanAlstine	Romulus	MI	\$155.00
Anedot / Legal Fund Page	3/16/23	Stephanie	A Dunn	Mount Pleasant	MI	\$25.00
Paypal / Convention Regis	3/16/23	Leonard	Schwartz	Oak Park	MI	\$45.00
Paypal / Convention Regis	3/16/23	Angela	Thornton	Linden	MI	\$170.00
Paypal / Convention Regis	3/15/23	Kyle	McCauley	Lapeer	MI	\$180.00
Paypal / Convention Regis	3/15/23	Jeffery	Yeasley	Lawton	MI	\$50.00
Paypal / Convention Regis	3/13/23	Claranna	Gelineau	Trenton	MI	\$180.00
Paypal / Convention Regis	3/13/23	Brandon	Warzybock	Lawrence	MI	\$60.00
Paypal / Convention Regis	3/13/23	Lorence	Wenke	Galesburg	MI	\$180.00
Paypal / Convention Regis	3/12/23	Ari	Abraham	Grand Haven	MI	\$25.00
Paypal / Convention Regis	3/12/23	Scott	Boman	Detroit	MI	\$85.00
Paypal / Convention Regis	3/12/23	Kosciuszko	Gilbert	Ann Arbor	MI	\$85.00
Paypal / Convention Regis	3/12/23	Lawrence	Johnson	Ypsilanti	MI	\$85.00
Paypal / Convention Regis	3/12/23	Eric	Kener	Galien	MI	\$10.00
Paypal / Convention Regis	3/11/23	Brian	Ellison	Monroe	MI	\$120.00
Paypal / Convention Regis	3/10/23	Jacob	Andrews	Holland	MI	\$85.00
Anedot / Legal Fund Page	3/10/23	Donna	Gundle-Krieg	MANCELONA	MI	\$200.00
Paypal / Convention Regis	3/10/23	Gregg	Smith	Lincoln Park	MI	\$85.00
Paypal / Convention Regis	3/9/23	William	Gelineau	Lowell	MI	\$255.00
Paypal / Convention Regis	3/9/23	William	Hall	Rockford	MI	\$150.00
Paypal / Convention Regis	3/9/23	Ronald	Hawkins	Battle Creek	MI	\$180.00
Paypal / Convention Regis	3/9/23	Joseph	LeBlanc	Plymouth	MI	\$85.00
Anedot / Legal Fund Page	3/9/23	Valerie	Sarwark	Manchester	NH	\$100.00
Paypal / Convention Regis	3/9/23	James	Schell	Howell	MI	\$180.00
Paypal / Convention Regis	3/8/23	Gregory	Creswell	Detroit	MI	\$180.00
Paypal / Convention Regis	3/8/23	Joseph	Gillotte	Lyons	MI	\$180.00
Paypal / Convention Regis	3/8/23	Dianne	Szabla	Farmington Hills	MI	\$360.00
Anedot / Legal Fund Page	3/7/23	Richard	Edgar	Cream Ridge	NJ	\$25.00
Paypal / Convention Regis	3/6/23	Lisa	Gioia	Milford	MI	\$180.00
Paypal / Convention Regis	3/6/23	Tullio	Proni	Kalamazoo	MI	\$100.00
Paypal / Convention Regis	3/5/23	Jason	Brandenburg	Portgag	MI	\$100.00

Paypal / Convention Regis	3/5/23	rafael	wolf	Kalamazoo	MI	\$35.00
Paypal / Convention Regis	3/4/23	Gregg	Smith	Lincoln Park	MI	\$85.00
Paypal / Convention Regis	3/4/23	Shelly	Stempfle	Ferndale	MI	\$85.00
Paypal / Convention Regis	3/4/23	Ginger	Walto	Holland	MI	\$85.00
Paypal / Convention Regis	2/26/23	Jonathan	Elgas	Brighton	MI	\$85.00
Anedot / Legal Fund Page	2/25/23	Lisa	Gioia	Milford	MI	\$100.00
Paypal / Convention Regis	2/24/23	William	Gelineau	Lowell	MI	\$360.00
LawPay / Direct to Attorney Curcio	2/24/23	Bill	Hall	Rockford	MI	\$5,000.00
LawPay / Direct to Attorney Curcio	2/22/23	Rafael	Wolf	Kalamazoo	MI	\$1,000.00
LawPay / Direct to Attorney Curcio	2/21/23	Kyle	McCauley	Lapeer	MI	\$1,000.00
Paypal / Email Response	2/18/23	Jason	Brandenburg	Portage	MI	\$199.00
Paypal / Email Response	2/13/23	Greg	Stempfle	Ferndale	MI	\$99.00
Paypal / Email Response	2/11/23	Angela	Thornton	Linden	MI	\$124.15
Paypal / Email Response	2/10/23	Brian	Ellison	Monroe	MI	\$250.00
Paypal / Email Response	2/10/23	Gregg	Smith	Lincoln Park	MI	\$50.00
Paypal / Email Response	2/10/23	rafael	wolf	Kalamazoo	MI	\$5.00
Paypal / Email Response	2/9/23	Jami	VanAlstine	Romulus	MI	\$5.00