

MARTIN V. LIBERTARIAN NATIONAL COMMITTEE

**To Declare Invalid the LNC Action Purporting to Void the Region 1
Election of May 10, 2025 and to Clarify the Interpretation of
Sustaining Membership Status, Rights, and Regional Autonomy**

SUPPLEMENTAL AMICUS OF CARYN ANN HARLOS

IN SUPPORT OF THE LNC

Date: March 13, 2026

This amicus is limited to one new point as the rest have been addressed and are in the hands of the JC. Mr. Martin states:

Article 7.8 of the bylaws provides that regional representatives may be removed or replaced only by the affiliate parties that constitute the region. By declaring the election void, the Chair substituted a national determination for the region's authority to evaluate its own election. Region 1 determined that Mr. Wiley was eligible and reaffirmed the election accordingly. [Martin Reply to LNC, p. 3]

And his previous comparison to a recent situation with At-Large Representative Robert Vinson:

Recently, At-Large Representative Robert Vinson was removed for a similar case of lapsed dues. [Martin Reply to LNC, p.2]

It is also important to have the exact language of Bylaws Art. 7.8:

A National Committee Regional Representative or Alternate may be removed and replaced only by the act of the affiliate parties that constitute the subject region.

While disputing the characterization that this action was a removal and maintaining that the JC should not go any further than denying for

mootness, I would like to meet Mr. Martin on his own argument that this was a removal, similar to a recent “removal” of Mr. Vinson.

Thus, I would like to draw the JC’s attention to the below portion of the Region 1 agreement (the full agreement can be read here: https://mywikis-wiki-media.s3.us-central-1.wasabisys.com/lpedia/Regional_Agreement_R1_2024-2026.pdf)

Once the Representatives have taken office, any person elected as a Regional Representative or Regional Alternate may be removed from office by:

1. A majority vote of the Regional Chairs.
2. Additionally, the Regional Chairs consent to the procedures outlined in the national Party Bylaws and Policy Manual for a removal vote by the LNC for an At-Large Representative with the exception that such a removal would not be appealable to the national Judicial Committee. If the Regional Chairs disagree with the removal of any of its Representatives by the LNC, the vacancy provision is held in abeyance for ten days to allow the Regional Chairs to re-appoint the removed Representative. [***]

So, if Bylaws Art. 7.8 is relevant, the signing of this agreement is an “act” of the regional affiliate parties that delegated removal power to the LNC to be treated in the same way as an At-Large representative. Thus Mr. Martin would have to argue that the proper removal for an At-Large representative was not followed (yet he concedes the LNC just acted in a similar manner with At-Large Representative Vinson), which would be the “Regional Chairs disagree[ing] with the removal.” The regional agreement then prohibits an appeal to the JC but gives a procedure to overriding the objectionable LNC decision: by re-appointment. That is effectively what was done. This appeal is meritless on multiple grounds. I do not agree that the appealed action involves a removal, but if it does, this section of the regional agreement comes into play. And the region already handled on its own.

Thank you for your time and service.

Caryn Ann Harlos, life member, Region 1 member