



Executive Committee Meeting Minutes December 9, 2025

Zoom Meeting

Call to Order

Chair Loren Dean called the meeting to order at 6:40 pm.

Roll Call

A quorum of the Libertarian Party of California (“LPCA”) Executive Committee was present, with the following voting members in attendance:

Officers:

Loren Dean, Chair
Rebecca Lau, Secretary
Mimi Robson, Treasurer

Area Coordinators:

Joe Dehn, Northern Area Coordinator
Marybeth Yuskavage, Central Area Coordinator
Brandon Jackson, Southern Area Coordinator

At Large Members:

Terry Floyd
June Genis
Mark Hinkle
Brian Holtz
Dave Schrader
Tara Young
Francisco Alanis (alternate)
Paul Vallandigham (alternate)

The following members were absent:

Pat Wright
Lawrence Samuels
Richard Stafford

The following guests were in attendance:

Pat Ford
Janice Mackenzie
Wesley Martin
Kat McElroy
Starchild

Adoption of Agenda

Chair Loren Dean distributed the following agenda:

**LPCA Executive Committee Meeting Agenda
Tuesday, December 9, 2025, 6:30 PM**

Executive Committee (ExCom) Members

Mr. Loren Dean, Chair
Mr. Pat Wright, Vice Chair
Ms. Rebecca Lau, Secretary
Ms. Mimi Robson, Treasurer
Mr. Joe Dehn, Northern Area Coordinator
Dr. Marybeth Yuskavage, Central Area Coordinator
Mr. Brandon Jackson, Southern Area Coordinator
Mr. Terry Floyd, At Large
Ms. June Genis, At Large
Mr. Mark Hinkle, At Large
Mr. Brian Holtz, At Large
Mr. Lawrence Samuels, At Large
Mr. Dave Schrader, At Large
Mr. Richard Stafford, At Large
Ms. Tara Young, At Large
Mr. Francisco Alanis, 1st At Large Alternate
Mr. Paul Vallandigham, 2nd At Large Alternate

Google Email Private Group

excom@ca.lp.org

Call to Order—6:30 PM

Roll call

Adopt agenda

Stand up reports (45 minutes total, 1-2 minutes each)

Public comment (10 minutes total, 2 minutes each)

Approve November Executive Committee Minutes (5 Minutes)

LNC Convention discussion with Pat Ford

LNC Region 4 Rep report

Treasurer Report

Lapsed Member project (Mark, Paul, and Dave)

Barton V. SEC court case (potential to co-sign)

Paying for EIN Wire subscription

Committee reports (as needed)

LPCA Budget 2026

Committee appointments (if any)

Sorting out the membership of the membership committee

Adjourn

Motion: Loren Dean moved, with second, to remove Stand up reports from the agenda. The motion passed without objection.

Motion: Mimi Robson moved, with second, to adopt the amended agenda. The motion passed without objection.

Public Comment

Mimi Robson gave a public comment.

Approval of November 15, 2025 ExCom Meeting Minutes

Motion: Mimi Robson moved, with second, to postpone the approval of minutes to next month. The motion passed without objection.

Libertarian National Convention Discussion

Pat Ford, chair of the LNC Convention Oversight Committee, spoke about the upcoming Libertarian National Committee in Grand Rapids, MI in 2026.

Marybeth Yuskavage joined the meeting at 6:59 pm.

Terry Floyd joined the meeting at 7:10 pm.

LNC Report

Mimi Robson delivered the Libertarian National Committee Report, which is attached hereto as Appendix A, and fielded questions.

Treasurer Report

Mimi Robson delivered the Treasurer Report, which is attached hereto as Appendix B, and fielded questions.

Membership Committee

Dave Schrader delivered the Membership Report.

Brian Holtz joined the meeting at 7:40 pm.

Amicus Brief

Motion: Loren Dean moved, with second, to add the Libertarian Party of California to an amicus brief regarding civil asset forfeiture. The motion passed without objection.

The amicus brief is attached as Appendix C.

Budget Committee Report

Mimi Robson delivered the Budget Committee Report, which is attached hereto as Appendix D, and fielded questions.

Motion: Mimi Robson moved, with second, to adopt the budget.

Vote: The motion passed by a vote of 12-0-0-1 (Yes/No/Express Abstention/Not Voting). The members of the Executive Committee voted as follows:

Loren Dean	Not Voting
Rebecca Lau	Yes
Mimi Robson	Yes
Joe Dehn	Yes
Marybeth Yuskavage	Yes
Brandon Jackson	Yes
Terry Floyd	Yes
June Genis	Yes
Mark Hinkle	Yes

Brian Holtz	Yes
Dave Schrader	Yes
Francisco Alanis	Yes
Paul Vallandigham	Yes

Membership Committee

Marybeth Yuskavage resigned from the membership committee.

Motion: Joe Dehn moved, with second, to adopt the following change to the Operating Procedures Manual:

Current Wording	Change	If Adopted
Membership Committee	Membership Committee	Membership Committee
The LPC Membership Committee shall consist of five central committee members and shall be elected by the Executive Committee within 60 days of the annual convention.	The LPC Membership Committee shall consist of five seven central committee members and shall be elected by the Executive Committee within 60 days of the annual convention.	The LPC Membership Committee shall consist of seven central committee members and shall be elected by the Executive Committee within 60 days of the annual convention.

Reason: The Membership Committee merged with the Recruitment Committee at a previous meeting.

Vote: The motion passed without objection.

Adjournment

Motion: Mimi Robson moved, with second, to adjourn. The motion passed without objection.

The Executive Committee adjourned at 8:25 pm.

APPENDIX A

LNC Report

Report Date: December 9, 2025

LNC Region 4

Representative: Meridith Hays

Alternate: Mimi Robson

LNC Report

LNC In-Person Meeting – December 6-7, 2025

The Libertarian National Committee met December 6-7 at the Hyatt Regency Dallas. I attended as the Region 4 Alternate and served as the voting representative for the weekend. Below is a structured summary of the most relevant updates for the Libertarian Party of California. Below is a summary of the meeting:

- **LNC Chair's Report**

Chair Steven Nekhaila opened with organizational and operational updates. Project Parity, within the broader Project Archimedes framework, will continue to focus on membership and fundraising initiatives. Candidate training remains a priority, with the goal of raising \$5,000 to hire C. Michael Pickens—an amount that was met during Saturday night's fundraiser, which raised \$5,010.

Additional highlights included:

- A renewed focus on Defend the Guard, especially in light of the situation in Venezuela.
 - Libertarian candidates won approximately 66% of the races in which they competed this year.
 - The Executive Director, Hannah Kennedy, was unable to present her report as she was in the hospital welcoming her new child and is currently on maternity leave.
 - A demand letter has been sent to former Chair Angela McArdle seeking repayment of approximately \$50,000 as identified in the investigation report. This action became possible after the Beth Vest lawsuit fully concluded.
- **Counsel's Report (Oliver Hall)**

Counsel provided updates on two major legal matters:

1. Beth Vest Litigation

- The lawsuit was dismissed, and the appeal period expired about a week before the meeting.
- With the case resolved, the LNC proceeded with the demand letter to Angela McArdle.

2. Lawsuit Filed by Caryn Ann Harlos

- A new case was filed in the District of Columbia seeking an injunction related to her NDA.
- She submitted a sealed report to the court and has asked that even the LNC not be permitted to view it; counsel does not expect the court to uphold that request.
- An extension will likely be sought, as the LNC cannot meaningfully respond without reviewing the report.
- This case will likely trigger the party's D&O insurance, which may add \$25,000 in legal expenses to the 2026 budget.

This marks the third lawsuit filed against the LNC in the past year.

- **LNC Staff Report**

Communications staff reported strong year-over-year growth. Facebook engagement has increased by 245%, Instagram engagement by 90%, and new Facebook followers by 57% during the last quarter. Additional initiatives include:

- Development of a weekly interview series, with outreach to Justin Amash regarding Venezuela.
- Expansion of the "Liberty Is Local" messaging strategy to highlight positive results and reduce burnout.
- Anti-war pin is helping fund video production for anti-war messaging.
- Reactivation of the LP.org blog, with plans for pro-market content.

- **LNC Ballot Access Committee Report**

Bill Redpath reported that the Ballot Access Committee had effectively completed its work for 2025 and stopped meeting around September because no additional drives were active. There was only one expenditure this year: \$10,000 for the Arkansas petitioning effort, which ended with roughly 30% more signatures than required.

He noted that overall spending is significantly lower than in past cycles because the party now begins with a stronger baseline of recognized access. However,

petitioning costs continue to rise nationwide. In Maryland, petitioners are currently being paid about \$5 per signature, up from a historical level of \$2, and costs may need to increase further. Maryland has already allocated \$20,000 toward its drive.

Redpath was also asked about the New Mexico drive from 2024. He explained that members of the Ballot Access Committee—including Caryn Ann Harlos—had made it clear at the time that the New Mexico drive could not be allowed to fail, and that this position was supported by the Executive Committee. In response, he traveled to New Mexico and worked for eight days, and Adrian Malagon also traveled to assist; without both of their efforts, the drive likely would not have succeeded.

He emphasized that ballot access remains essential and will need to be managed on a case-by-case basis given rising costs.

- **LNC EPCC and FSC Committee Reports**

Jessi Cowart delivered reports on both the EPCC and the FSC.

The EPCC continues to meet monthly and has coordinated with staff to maintain workflow during the Executive Director's maternity leave. The committee has been monitoring ongoing projects and assisting with review processes to ensure there are no disruptions during this period.

The FSC is focused on establishing formal committee procedures and overseeing the party's financial operations. The committee approved several operational expenditures, including data-cleanup work and mailers, both of which generated positive returns. The FSC also declined a \$5,000 video production request pending the availability of fundraising to support it.

- **LNC Convention Oversight Committee Report**

Pat Ford delivered the Convention Oversight Committee report. Planning for the 2026 national convention is underway, with the following key updates:

- Approximately 700 rooms are included in the convention block, with about 140 booked to date.
- Rooms require no advance payment and may be cancelled without penalty, so early reservations are strongly encouraged.
- Work continues on speakers, lighting, exhibitor areas, and updates to the convention website. Some items related to speakers and NDAs were addressed in executive session.

- **2026 LNC Budget**

The budget presented to the LNC was developed through multiple levels of review. The Budget Committee prepared the initial draft, which was then considered and revised by the Executive Committee. After the Executive

Committee's review, the proposal reflected a deficit of \$237,867 and was approved to be brought forward to the LNC for adoption.

During the LNC meeting, further revisions were made, reducing the deficit to \$45,000. Because this remaining amount is relatively small, it was noted that a single maximum donor contribution could eliminate the deficit entirely, and both the Chair and Vice Chair will be working to secure that support.

As part of these adjustments, general ballot-access funding was reduced and will now rely on targeted fundraising efforts.

- **Committee Appointments**

The LNC made its appointments to several committees as required by the bylaws. Only the Platform and Credentials Committees include both LNC-elected members and state-appointed members; the Awards and Ballot Access Committees are composed entirely of LNC appointees.

Platform Committee

Under the bylaws, the Platform Committee consists of twenty members, with five chosen by the LNC and the remaining seats filled by qualifying state affiliates. The LNC elected:

- Tony D'Orazio
- Mike Seebeck
- Jay Gillotte
- Keith Thompson
- Stephanie Berlin

The LNC also elected Russell Brooksbank as the alternate.

Several states have or will appoint the remaining members. California elected Rachel Nyx as its member and Wesley Martin as its alternate at our November LPC meeting. Texas appointed Ted Brown, which is relevant because he was later named interim chair.

Credentials Committee

The Credentials Committee consists of ten members: five elected by the LNC and five appointed by the affiliates with the largest sustaining memberships. Because the bylaws require the LNC's five seats to be selected no later than six months before a regular convention, the Executive Committee met on November 21 to appoint temporary members so the committee would be populated before the deadline. These temporary members were appointed only to serve until the in-person meeting.

At the meeting, the LNC elected the permanent members to fill those seats. The members elected were:

- Ken Moellman
- Jami Van Alstin
- Susan Hogarth
- Tyler Danke
- Joe Hannoush

Only these five candidates received majority support, so no alternates were elected.

California is one of the qualifying affiliates. At our November LPC meeting, California appointed Jessica Tewksberry as its member and me as its alternate. Other qualifying states have or will appoint their members prior to the bylaws deadline.

Awards Committee

The Awards Committee is fully appointed by the LNC. The LNC elected:

- James Lark
- Jonathan McGee
- Evan McMahan
- Evin McMahan
- Mimi Robson

Ballot Access Committee

The Ballot Access Committee is also fully appointed by the LNC. The LNC elected:

- Bill Redpath
- Harrison Hemp
- Andrew Jacobs
- Tony D'Orazio
- Jake Porter

Interim Chairs

Until each committee elects its own chair, the LNC Chair appointed the following to be the interim Committee Chairs:

- Platform Committee: Ted Brown
- Credentials Committee: Ken Moellman
- Awards Committee: James Lark
- Ballot Access Committee: Bill Redpath
- **Saturday Night Fundraiser**

The Saturday evening fundraiser featured Mike Sertic of Advocates for Self-Government and Dr. Mary Ruwart of Liberty International. The event successfully raised \$5,010 to fully fund the candidate-training initiative.

Additional Updates Since the Last Report

Other than the December 6–7 in-person meeting, there have been no additional full LNC meetings since my last report. There was, however, one Executive Committee meeting on November 21. The purpose of that meeting was to appoint temporary members to the Credentials Committee, because the committee had to be populated prior to the bylaws-mandated deadline, which fell before the December in-person session. The Executive Committee appointed Steven Nekhaila, Paul Darr, Evan McMahon, James Wiley, and Andrew Watkins to serve temporarily.

These temporary members served only until the in-person meeting, at which point the LNC elected the permanent members to replace them, as described earlier in this report.

In addition, on November 30, the Secretary released the official delegate allocation for the 2026 National Convention. California now represents 10.83% of national membership, with 1,006 members, which earns us 77 membership-based delegates. California also received 66,662 presidential votes in 2024, representing 10.254% of all votes cast, which grants an additional 30 delegates. California will therefore have a total of 107 delegates for 2026—an increase from 103 delegates in both 2022 and 2024.

In Liberty,

Mimi Robson, LNC Region 4 Alternate

APPENDIX B

Treasurer's Report

Report Date: December 9, 2025

Treasurer: Mimi Robson

Executive Overview

Since the last report, I have continued updating the Party's financial records. Progress has been steady, though slower than anticipated due to other commitments and the time required to resolve several issues uncovered during reconciliation. As I work through the books, I have identified items that require further research and correction to ensure that both QuickBooks and our regulatory filings remain accurate and internally consistent.

Key issues currently being addressed include:

- **Outstanding candidate loan entries:** Several candidate loans that should have been forgiven in 2023 were still appearing in QuickBooks and in prior FPPC filings. While our accountant correctly reflected the forgiveness in the most recent FPPC report, the historical entries still need to be updated in QuickBooks to ensure complete alignment of the records.
- **Deposit inconsistencies:** During reconciliation, I identified both mobile and branch deposits that had not been entered into NEON and were therefore recorded incorrectly in QuickBooks. Each of these entries requires manual correction to maintain accurate donor and cash-flow reporting.

Once all records are fully updated, I will begin working more closely with Michael Van Roy to transition portions of the workload and begin formal training. In the interim, he has been granted access to the CSC QuickBooks account in his role as CSC Treasurer and Assistant Treasurer so he can begin familiarizing himself with the system.

Financial Status

In last month's report, I noted several factors affecting our year-to-date financial position, including two one-time donations, the Proposition 50 mailer, the annual NEON payment, and an unresolved \$2,800 FreedomFest charge. Those points continue to apply for context, but the updated Budget vs. Actuals report through December 9, 2025, provides a clearer picture of our current standing.

Since the last report, I have resolved the FreedomFest discrepancy. The state party booth was cancelled, and instead we contributed \$500 toward the Riverside County booth. The only additional costs were \$90 in bank fees associated with failed wire-

transfer attempts. Both amounts have now been properly recorded, and there is no outstanding liability related to this item.

Based on the attached Budget vs. Actuals report (through December 9, 2025):

- **Income is at 102.22% of budget**, with actual income of **\$58,287.61**. As previously noted, income remains elevated primarily because of two major nonrecurring donations earlier in the year.
- **Expenses are at 99.33% of budget**, with actual expenditures of **\$52,356.91**, placing us slightly under budget overall. Additional entries may still shift modestly once reconciliation work is complete.
- **Net income stands at 137.54% of budget**, with year-to-date net income of **\$5,930.70**.

Since the last report, I have received the additional information needed from many counties, and the remaining dues-sharing checks will be issued this weekend. I apologize for the delay; as noted earlier, the combination of outstanding reconciliation items and other obligations extended this process more than expected.

Finally, QuickBooks is still not fully synced with our bank accounts, and some figures in the attached reports may change slightly once all reconciliation updates and dues-sharing entries are finalized.

Bank balances as of December 9, 2025 are as follows:

- LPC Account: \$88,947.06
- CSC FPPC Account: \$11,841.40
- CSC FEC Account: \$26,014.91
- **Total: \$126,803.37**

Government Reports

There have been no additional FPPC Form 460 filings since my last report. The next filing will be the Semi-Annual Report due on February 2, 2026.

Regarding the outstanding 2024 FEC Form 3X reports, I have finally obtained a direct contact at the FEC through Evan McMahon, LNC Secretary. As noted previously, the Third-Quarter, Post-Election, and Year-End reports for 2024 were never filed electronically, and FECFile will not allow me to create or transmit filings for prior years. To resolve this, the FEC must first enter zero-dollar placeholder reports for the affected periods, after which I will be able to amend and submit the corrected reports electronically. I am hopeful this process can be completed soon once the necessary updates are made on the FEC's end.



To the best of my knowledge, our accountant is still working on the IRS Form 990-EZ, which is due May 15, 2026.

In Liberty,

Mimi Robson, Treasurer
Libertarian Party of California

Documents that are part of this report:

Budget vs Actuals YTD

APPENDIX C

In the
Supreme Court of the United States

TIMOTHY BARTON,

Petitioner,

v.

SECURITIES AND EXCHANGE COMMISSION,

Respondent.

On Petition for a Writ of Certiorari to the
United States Court of Appeals for the Fifth Circuit

BRIEF OF AMICI CURIAE
LIBERTARIAN PARTIES OF IDAHO, KENTUCKY,
MAINE, MARYLAND, MISSISSIPPI, NEBRASKA, OREGON,
PENNSYLVANIA, TENNESSEE, AND THE
WE THE PEOPLE PARTY OF PENNSYLVANIA
IN SUPPORT OF PETITIONER

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Or. Criminal Justice Comm’n, <i>Asset Forfeiture Report 45</i> (2024), https://www.oregon.gov/cjc/CJC%20Document%20Library/2024_Asset_Forfeiture_Report.pdf (last visited Nov. 13, 2025)	10
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INTEREST OF THE AMICI CURIAE

The Amici Curiae¹ are:

- LIBERTARIAN PARTY OF KENTUCKY
- LIBERTARIAN PARTY OF MAINE
- LIBERTARIAN PARTY OF MARYLAND
- LIBERTARIAN PARTY OF MISSISSIPPI
- LIBERTARIAN PARTY OF NEBRASKA
- LIBERTARIAN PARTY OF OREGON
- LIBERTARIAN PARTY OF PENNSYLVANIA
- LIBERTARIAN PARTY OF TENNESSEE
- WE THE PEOPLE PARTY OF PENNSYLVANIA

Amici Curiae are state-level political organizations dedicated to advancing individual liberty, limited government, and robust constitutional protections against government overreach, particularly in areas such as civil asset forfeiture and due process violations. Each Amicus respectfully submits this brief in support of the petition for a writ of certiorari. Their platforms explicitly condemn civil asset forfeiture as an abridgement of fundamental property rights, calling for an end to its use without due process and supporting reforms

¹ Pursuant to Supreme Court Rule 37.2(a), Amici Curiae provided timely notice of its intent to file this brief to counsel for all parties. No counsel for any party authored this brief in whole or in part, and no one other than Amici and its supporters made any monetary contribution to its preparation or submission.

to ensure seizures occur only after conviction with protections for the innocent.²

Amici represent thousands of members across their respective states who value constitutional safeguards against government overreach, particularly in practices that incentivize revenue-driven enforcement over justice. Civil asset forfeiture and analogous SEC receiverships operate nationwide, generating millions for law enforcement and agencies while implicating due process and separation-of-powers concerns in every jurisdiction. For example, in Oregon, state forfeiture laws have generated millions for law enforcement agencies, with at least 74% of forfeited properties processed under civil (non-criminal) laws, often without convictions.³ Comparable abuses occur in Amici's home states, driving their collective advocacy for reform, as such practices create legal uncertainty that burdens economic activity and erodes trust in institutions.

Amici's interests align with the public's: preserving a constitutional order where law precedes seizure and enforcement follows conviction. SEC receiverships, like those challenged here, function analogously to civil forfeiture by freezing assets pre-conviction. If unchecked, they undermine the objective standards—enacted by Congress and enforced by courts—that Amici's members require for secure property rights. Amici submit

² Libertarian Party, *Platform* § 2.1 (Aggression, Property, and Contract) (2024), <https://lp.org/platform-page/>.

³ Institute for Justice, *Policing for Profit: The Abuse of Civil Asset Forfeiture* 45 (3D ED. 2023), <https://ij.org/report/policing-for-profit/> (noting national trends, including Oregon's 80% non-conviction seizure rate).

this brief to defend the principle of divided, accountable power that sustains American liberty.



SUMMARY OF ARGUMENT

Civil asset forfeiture allows the government to seize private property on suspicion alone, without charging or convicting the owner, often forcing innocents to prove their claims in costly proceedings. From a libertarian perspective, this practice erodes the Fourth, Fifth, Eighth, and Fourteenth Amendments by prioritizing revenue over justice, inverting the presumption of innocence, and incentivizing abuse. SEC receiverships, as in this case, mirror these flaws by enabling broad equitable freezes under Section 21(d)(5) of the *Securities Exchange Act of 1934*, 15 U.S.C. § 78u(d)(5), without adequate pre-deprivation safeguards—echoing the disgorgement limits in *Liu v. SEC*.⁴

This case exemplifies the constitutional risks: unchecked receiverships combine executive seizure with judicial ratification, placing individuals at the mercy of revenue-focused enforcement. Such volatility threatens everyday liberty, as assets underpin stability; a single overreach discourages lawful conduct and burdens the vulnerable. The separation of powers—Article I rulemaking by Congress, Article II faithful execution, and Article III adjudication—guards against this by ensuring predictability.⁵

⁴ *Liu v. SEC*, 591 U.S. 71, 140 S. Ct. 1936, 207 L. Ed. 2d 401 (2020).

⁵ U.S. Const. art. I

For centuries, American prosperity has thrived under legal clarity, with courts demanding statutory grounding for government action. Forfeiture and receivership reform would engineer similar trust, supplanting discretion with due process. Yet when agencies like the SEC expand beyond statute, they erode supervised liberty.

The question presented here is pivotal: Shall property rights evolve under the *rule of law*, or yield to administrative fiat? This Court has advanced certainty—in *Timbs v. Indiana*, incorporating the Excessive Fines Clause; in *Culley v. Marshall*, mandating prompt hearings; in *United States v. Bajakajian*, curbing disproportionality.⁶ Extending these to SEC receiverships would discipline enforcement, ensuring it adheres to proper channels.

The Amici submits that liberty, progress, and constitutional structure are intertwined. Honoring boundaries enables confident enterprise; breaching them invites overreach. Granting certiorari would reaffirm predictable rights as prosperity's foundation.

⁶ *Timbs v. Indiana*, 586 U.S. 146, 139 S. Ct. 682, 203 L. Ed. 2d 11 (2019); *Culley v. Marshall*, 602 U.S. 134, 144 S. Ct. 1004, 228 L. Ed. 2d 299 (2024); *United States v. Bajakajian*, 524 U.S. 321, 118 S. Ct. 2028, 141 L. Ed. 2d 314 (1998).



ARGUMENT

I. Property Rights and Predictability Are Constitutional Values.

In a free society, individuals require reasonable expectations that governing rules remain stable. The Constitution ensures this through structural continuity: government of enumerated powers, exercised predictably. When seizures or freezes—whether in forfeiture or SEC receiverships—extend beyond statute or receive undue judicial deference, predictability erodes, undermining investment and liberty.

Predictability is liberty’s bedrock. As Justice Gorsuch observed in *Loper Bright Enterprises v. Raimondo*, the rule of law demands “rules—written by [the people’s] representatives [and] faithfully applied.”⁷ For libertarians, this means planning under public, stable statutes. Discretionary asset restraints, like the SEC’s here, make compliance elusive, as owners cannot anticipate unwritten risks. Liberty thus demands strict separation of powers, safeguarding property as an extension of autonomy against arbitrary whim. Since the Founding, prosperity has hinged on stable institutions. Madison warned in *The Federalist No. 47* that accumulated powers “may justly be pronounced the very definition of tyranny.”⁸ Regulators claiming unstatutory authority, with courts acquiescing, con-

⁷ *Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 385, 144 S. Ct. 2244, 231 L. Ed. 2d 238 (2024).

⁸ *The Federalist No. 47* (James Madison) (Feb. 1, 1788), in 1 *The Federalist Papers* 301 (Clinton Rossiter ed., 1961).

solidate that feared power. The consequence is not overt tyranny but pervasive uncertainty, stifling free enterprise.

This Court recognizes economic stability’s import. In *West Virginia v. EPA*, it required “clear congressional authorization” for major agency actions—a principle of due process predictability.⁹ Similarly, *Timbs v. Indiana* unanimously applied the Eighth Amendment’s Excessive Fines Clause to states, mandating proportionality before asset seizures.¹⁰ In receiverships, as challenged here, such clarity is essential: assets sustain lives, and retroactive restraints punish possession over proven wrongdoing.

II. Civil Forfeiture Creates Incentives for Abusive “Policing for Profit”.

Equitable expansions of forfeiture and receiverships—seizing or freezing assets without conviction—foster incentives misaligned with justice. Nationally, forfeitures generate billions annually, yet approximately 80% involve no arrests.¹¹ Libertarians view this as a perversion of enforcement into revenue generation.

In *United States v. Bajakajian*, this Court reduced a \$357,000 forfeiture to a \$5,000 fine proportional to the offense.¹² Yet the “gross disproportionality” test

⁹ *W. Va. v. EPA*, 597 U.S. 697, 721, 142 S. Ct. 2587, 213 L. Ed. 2d 896 (2022).

¹⁰ *Timbs v. Indiana*, 586 U.S. 146, 149, 139 S. Ct. 682, 203 L. Ed. 2d 11 (2019).

¹¹ Inst. for Justice, *supra* note 2, at 12.

¹² *United States v. Bajakajian*, 524 U.S. 321, 324, 118 S. Ct. 2028, 141 L. Ed. 2d 314 (1998).

remains underenforced, permitting excessive penalties. Raids yielding minimal evidence—residue traces or administrative violations—prioritize funds over accountability. The pending *Young v. United States* builds on *Honeycutt v. United States* to limit liability for untainted assets.¹³

Grupo Mexicano de Desarrollo S.A. v. Alliance Bond Fund, Inc. confines equitable remedies to historical practice.¹⁴ *Free Enterprise Fund v. Public Co. Accounting Oversight Board* mandates oversight for accountability.¹⁵ Yet receiverships evade these by sidestepping criminal process, as in *Liu v. SEC*, which cabined disgorgement to net profits.¹⁶ *State v. One (1) 2004 Lincoln Navigator* rejected the exclusionary rule for forfeitures, enabling tainted evidence and overreach.¹⁷ Such practices demand reform, as *The Federalist No. 62* deems predictability law’s essence.¹⁸

¹³ *Young v. United States*, No. 24-571 (U.S. Apr. 29, 2025) (*cert. denied*); *Honeycutt v. United States*, 581 U.S. 402, 408, 137 S. Ct. 1626, 198 L.Ed.2d 39 (2017).

¹⁴ *Grupo Mexicano de Desarrollo S.A. v. Alliance Bond Fund, Inc.*, 527 U.S. 308, 319, 119 S. Ct. 1961, 144 L. Ed. 2d 319 (1999).

¹⁵ *Free Enter. Fund v. Pub. Co. Accounting Oversight Bd.*, 561 U.S. 477, 484, 130 S. Ct. 3138, 177 L. Ed. 2d 706 (2010).

¹⁶ *Liu v. SEC*, 591 U.S. 71, 81, 140 S. Ct. 1936, 207 L. Ed. 2d 401 (2020).

¹⁷ *State v. One (1) 2004 Lincoln Navigator*, 437 S.W.3d 386, 392 (Tex. 2014).

¹⁸ *The Federalist No. 62* (James Madison) (Feb. 27, 1788), in 1 *The Federalist Papers* 378 (Clinton Rossiter ed., 1961).

See also *Letter from Alexander Hamilton to Edward Carrington* (warning against caprice).¹⁹

III. Forfeiture as Punishment Without Due Process Harms the Innocent.

Forfeiture and analogous restraints punish process, not crime, by seizing innocents’ assets and shifting the proof burden to claimants. In *Culley v. Marshall*, this Court required post-seizure hearings but not pre-deprivation review, potentially depriving owners of assets for months contrary to *Mathews v. Eldridge’s* balancing.²⁰ Justice Gorsuch critiqued this as “guilt by association,” disproportionately affecting vulnerable individuals.²¹ *Leonard v. Texas* deemed forfeiture “suspect” for lax safeguards, invoking Takings concerns—yet upheld a \$200,000 seizure against an innocent.²² In *Snitko v. United States*, the Ninth Circuit condemned warrantless forfeitures of 1,500 safe-deposit boxes as Fourth and Fifth Amendment violations.²³

These practices echo in state-level excesses, analogous to the federal overreach in SEC receiver-

¹⁹ Letter from Alexander Hamilton to Edward Carrington (May 26, 1792), in 11 *The Papers of Alexander Hamilton* 428 (Harold C. Syrett ed., 1962).

²⁰ *Culley v. Marshall*, 602 U.S. 134, 140, 144 S. Ct. 1004, 228 L. Ed. 2d 299 (2024); *Mathews v. Eldridge*, 424 U.S. 319, 335, 96 S. Ct. 893, 47 L. Ed. 2d 18 (1976).

²¹ *Culley v. Marshall*, 602 U.S. 134, 153, 144 S. Ct. 1004, 228 L. Ed. 2d 299 (2024) (Gorsuch, J., concurring).

²² *Leonard v. Texas*, 137 S. Ct. 978 (2017) (statement respecting denial of certiorari).

²³ *Snitko v. United States*, No. 22-56050, 2024 WL 253211, at *1 (9th Cir. Jan. 23, 2024).

ships, where unproven suspicions justify asset freezes disproportionate to any penalty. In 2023, this Court held in *Tyler v. Hennepin County*, that the Fifth Amendment’s Takings Clause prohibits retaining excess value from seized property beyond the debt owed.²⁴ The same standard should govern civil asset forfeitures, limiting takings to levied fines.

For instance, in *Jouppi v. Alaska*,²⁵ a pilot’s \$88,000 Cessna was forfeited for transporting a six-pack of beer to a remote Alaskan village—a \$300 misdemeanor.²⁶ Under *Tyler*, the state could retain only \$300 after sale, returning the surplus or offering redemption.

In Oregon, detailed data tracks similar disparities: from 2023–2024, forfeitures fell from 26 to 22 cases, yet 90.9% were drug-related—mostly black-market cannabis operations spurred by California’s overregulation and taxation, inviting federal raids under the Controlled Substances Act.²⁷ These seizures, often exceeding fines by multiples, have devastated small-scale operations and family livelihoods, sometimes driving individuals toward illicit alternatives to sur-

²⁴ *Tyler v. Hennepin Cnty.*, 598 U.S. 631, 143 S. Ct. 1369, 215 L. Ed. 2d 109 (2023).

²⁵ *Jouppi v. Alaska* (U.S. cert. petition pending, No. 25-246 (filed Aug. 29, 2025)).

²⁶ *Jouppi v. State*, Nos. S-18598/S-18637, 2025 WL 18598, at *1 (Alaska Apr. 18, 2025).

²⁷ Press Release, U.S. Dep’t of Justice, *\$6 Million Worth of Oregon Properties Forfeited in Connection to Interstate Marijuana Trafficking* (Apr. 1, 2024), <https://www.justice.gov/usao-or/pr/6-million-worth-oregon-properties-forfeited-connection-interstate-marijuana-trafficking> (last visited Nov. 13, 2025).

vive.²⁸ Reforms must apply *Tyler*'s limits to prevent such inequities, ensuring federal tools like receiverships do not amplify state-level imbalances. This parallels *Near v. Minnesota*'s bar on prior restraints.²⁹ *Luis v. United States* protects untainted assets;³⁰ Gorsuch's *Gundy v. United States* dissent and *Youngstown Sheet & Tube Co. v. Sawyer* curb executive improvisation.³¹ As the Institute for Justice documents, these abuses devastate communities; reforms must require proof beyond suspicion and extend *Timbs*' proportionality.³²

²⁸ Or. Criminal Justice Comm'n, *Asset Forfeiture Report* 45 (2024), https://www.oregon.gov/cjc/CJC%20Document%20Library/2024_Asset_Forfeiture_Report.pdf (last visited Nov. 13, 2025).

²⁹ *Near v. Minnesota ex rel. Olson*, 283 U.S. 697, 713, 51 S. Ct. 625, 75 L. Ed. 1357 (1931).

³⁰ *Luis v. United States*, 578 U.S. 5, 10, 136 S. Ct. 1850, 195 L. Ed. 2d 282 (2016).

³¹ *Gundy v. United States*, 588 U.S. 128, 167, 139 S. Ct. 2116, 204 L. Ed. 2d 522 (2019) (Gorsuch, J., dissenting); *Youngstown Sheet & Tube Co. v. Sawyer*, 343 U.S. 579, 589, 72 S. Ct. 863, 96 L. Ed. 1153 (1952).

³² *Timbs v. Indiana*, 586 U.S. 146, 154, 139 S. Ct. 682, 203 L. Ed. 2d 11 (2019); Inst. for Justice, *supra* note 2, at 56.

IV. Reforming Forfeiture Restores Trust in Individual Liberty and the Rule of Law.

Reform—tethering seizures to convictions and mandating hearings—rebuilds trust by enforcing separation. *Loper Bright Enterprises v. Raimondo* and *West Virginia v. EPA* insist on clear authorization; *SEC v. Jarkesy* requires Article III juries for penalties.³³ *Timbs v. Indiana* incorporates fines protections; *United States v. Bajakajian* demands proportionality.³⁴ *McCulloch v. Maryland* affirms enduring limits on power.³⁵ *The Federalist No. 78* praises judicial fidelity.³⁶ Remedies include warrants, evidence suppression, and innocent-owner shields—channeling enforcement through statute. Economic liberty and constitutional design interlink: observed boundaries foster confidence; breaches enable overreach.³⁷ Certiorari here would affirm rights as governance’s infrastructure.

³³ *Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 387, 144 S. Ct. 2244, 231 L. Ed. 2d 238 (2024); *W. Va. v. EPA*, 597 U.S. 697, 721, 142 S. Ct. 2587, 213 L. Ed. 2d 896 (2022); *SEC v. Jarkesy*, 603 U.S. 109, 128, 144 S. Ct. 2117, 229 L. Ed. 2d 1 (2024).

³⁴ *Timbs v. Indiana*, 586 U.S. 146, 149, 139 S. Ct. 682, 203 L. Ed. 2d 11 (2019); *United States v. Bajakajian*, 524 U.S. 321, 336, 118 S. Ct. 2028, 141 L. Ed. 2d 314 (1998).

³⁵ *McCulloch v. Maryland*, 17 U.S. (4 Wheat.) 316, 405, 4 L. Ed. 579 (1819).

³⁶ *The Federalist No. 78* (Alexander Hamilton) (May 28, 1788), in 1 *The Federalist Papers* 465 (Clinton Rossiter ed., 1961).

³⁷ *The Federalist No. 47*, *supra* note 8, at 301.



CONCLUSION

From a libertarian standpoint, civil asset forfeiture and analogous SEC receiverships exemplify governmental overreach, inverting innocence by presuming assets guilty and enabling pre-conviction confiscation without compensation. This regime violates the Eighth Amendment’s Excessive Fines Clause—as *Timbs v. Indiana* and *United States v. Bajakajian* require proportionality—but also erodes Fourteenth Amendment due process, disregarding *Mathews v. Eldridge*’s balancing and *Culley v. Marshall*’s hearing mandate.³⁸ Echoing Madison’s caution in *The Federalist No. 47* that power accumulation defines tyranny, it permits regulators to usurp legislative roles, with courts abetting executive excess akin to critiques in Justice Gorsuch’s *Gundy v. United States* dissent and *Youngstown Sheet & Tube Co. v. Sawyer*’s limits.³⁹ The Institute for Justice’s reports expose how this revenue-driven enforcement harms communities, fostering uncertainty that hampers the free enterprise the Founders championed.⁴⁰

³⁸ *Timbs v. Indiana*, 586 U.S. 146, 139 S. Ct. 682, 203 L. Ed. 2d 11 (2019); *United States v. Bajakajian*, 524 U.S. 321, 118 S. Ct. 2028, 141 L. Ed. 2d 314 (1998); *Mathews v. Eldridge*, 424 U.S. 319, 96 S. Ct. 893, 47 L. Ed. 2d 18 (1976); *Culley v. Marshall*, 602 U.S. 134, 144 S. Ct. 1004, 228 L. Ed. 2d 299 (2024).

³⁹ *The Federalist No. 47*, *supra* note 8; *Gundy v. United States*, 588 U.S. 128, 139 S. Ct. 2116, 204 L. Ed. 2d 522 (2019) (Gorsuch, J., dissenting); *Youngstown Sheet & Tube Co. v. Sawyer*, 343 U.S. 579, 72 S. Ct. 863, 96 L. Ed. 1153 (1952).

⁴⁰ Inst. for Justice, *supra* note 2.

To restore fidelity, the Court should grant certiorari, vacate the judgment below, and remand with instructions for reforms: link forfeitures to convictions, bolster innocent-owner defenses, and demand state-borne evidentiary burdens exceeding suspicion. By unmasking the procedural shields for these restraints and applying Takings scrutiny, we secure self-ownership, positioning government as servant rather than sovereign. Only so can prosperity thrive free from arbitrary deprivations that undermine the American experiment.

Respectfully submitted,

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November 17, 2025

APPENDIX D

Budget Committee Report

Report Date: December 9, 2025

Committee Chair: Mimi Robson

Members: Kat McElroy and Mike Van Roy

Committee Purpose

The Budget Committee consists of the Treasurer and up to four members elected by the Executive Committee, and the members of the committee elect their own chair. The committee serves at the pleasure of the Executive Committee and is responsible for constructing a proposed budget of income and expenses for the next fiscal year and delivering that proposed budget to the Executive Committee by its final meeting of the fiscal year.

Under the bylaws, the adoption of the annual budget requires a two-thirds vote of all eligible Executive Committee positions. Once the Treasurer presents the proposed budget and makes the motion to adopt, and that motion is seconded, the budget may be amended by a majority vote, but the final adoption still requires the affirmative vote of two-thirds of the full Executive Committee as defined in the bylaws.

General Overview

At the September 9, 2025 Executive Committee meeting, three members were elected to the Budget Committee: Mimi Robson, Kat McElroy, and Mike Van Roy. Chris Minoletti served on the committee by virtue of being Treasurer at that time, bringing the initial membership to four.

The committee met four times – on October 1, November 4, November 11, and November 25 – with all members in attendance at each meeting. This is the committee’s only written report and concludes with the submission of the proposed Fiscal Year 2026 budget for Executive Committee consideration and adoption.

At the October 1 organizational meeting, **Chris Minoletti, serving as Treasurer**, was nominated and elected as Committee Chair. After Chris resigned as Treasurer and from the committee, the Executive Committee appointed Mimi Robson as Treasurer, leaving two elected-member vacancies. At the November 4 meeting, **Mimi Robson, serving as Treasurer**, was nominated and elected as Committee Chair, and the remaining members continued the committee’s work without interruption.

Executive Summary

The purpose of the committee's work was to review the Party's financial activity, assess projected income and expenses, and prepare a responsible and realistic budget for the 2026 fiscal year. Over four meetings, the committee evaluated historical revenue trends, recurring operational expenses, technology and service subscriptions, dues-sharing obligations, and convention-related income and expenses to determine appropriate budgeted amounts for the coming year.

At the outset of the process, the Treasurer noted that some cleanup of the bookkeeping records was necessary to establish a reliable baseline for budget development. As that cleanup progressed, the Treasurer was able to provide the committee with a clearer and more accurate financial picture on which to base the FY2026 projections. The committee then focused its efforts solely on budget formulation.

Scope of the FY2026 Budget

During its review, the committee determined that adjustments were necessary to maintain the required separation between the Party's restricted and unrestricted accounts. The committee agreed that all unrestricted donations should be transferred to the CSC account, which is subject to FPPC contribution-limit rules and is the only account permitted to support candidates.

Because of those FPPC restrictions, the committee confirmed that the Party's website and the CRM system (NEON), both of which have the capacity to promote candidates, must be paid from the unrestricted CSC account rather than the restricted LPC operating account. Accordingly, these expenses are not included in the FY2026 budget proposal, which covers only the restricted LPC operating budget.

Conclusion and Vote

The final draft budget was completed at the November 25 meeting. The committee conducted its official vote via email on December 3rd, approving the proposed FY2026 budget by a vote of 3-0. The approved budget is attached to this report and will be presented to the Executive Committee at the December 9, 2025 meeting.

Recommendation

The Budget Committee recommends adoption of the attached FY2026 Budget. As Treasurer, I will be making the motion to adopt the proposed budget at the December 9, 2025 Executive Committee meeting.

Respectfully Submitted,

Mimi Robson, Chair
Budget Committee Chair

Attachments:

2026 Fiscal Year Proposed Budget

Libertarian Party of California

Budget vs. Actuals: Budget_FY25_P&L - FY25 P&L

January - December 2025

	TOTAL			
	ACTUAL	BUDGET	OVER BUDGET	% OF BUDGET
Income				
4a Donations				
401 Gifts-Unrestricted		0.00	0.00	
4011 Gifts-Unrestricted-One Time	17,015.64	8,000.00	9,015.64	212.70 %
4012 Gifts-Unrestricted-Recurring	1,415.47	2,000.00	-584.53	70.77 %
Total 401 Gifts-Unrestricted	18,431.11	10,000.00	8,431.11	184.31 %
Total 4a Donations	18,431.11	10,000.00	8,431.11	184.31 %
5a Membership Dues				
5210 Renewal	6,377.00	11,000.00	-4,623.00	57.97 %
5212 New Member	1,375.00	2,000.00	-625.00	68.75 %
5230 Revenue from Premiums	4,202.06	2,500.00	1,702.06	168.08 %
Total 5a Membership Dues	11,954.06	15,500.00	-3,545.94	77.12 %
5c Events-Revenue				
5500 Convention	21,035.57	30,000.00	-8,964.43	70.12 %
5550 Event Donation Revenue	6,860.53		6,860.53	
Total 5c Events-Revenue	27,896.10	30,000.00	-2,103.90	92.99 %
5e Area Offices Income				
5601 Northern Area		500.00	-500.00	
5602 Central Area		500.00	-500.00	
5603 Southern Area		500.00	-500.00	
Total 5e Area Offices Income		1,500.00	-1,500.00	
6000 Interest - Checking and Savings	6.34	21.20	-14.86	29.91 %
6999 Uncategorized Income		0.01	-0.01	
Total Income	\$58,287.61	\$57,021.21	\$1,266.40	102.22 %
GROSS PROFIT	\$58,287.61	\$57,021.21	\$1,266.40	102.22 %
Expenses				
7020 County Dues Sharing	1,787.50	6,000.00	-4,212.50	29.79 %
7520 Accounting Fees		6,370.00	-6,370.00	
8110 Office Supplies	402.80	200.00	202.80	201.40 %
8130 Telephone & Telecommunications	649.13	1,000.00	-350.87	64.91 %
8134 Domain & Website Services	1,349.00	1,200.00	149.00	112.42 %
8140 Postage, Shipping, Freight & Delivery	95.91	0.00	95.91	
8152 Bulk Email Services	1,116.00	0.00	1,116.00	
8154 Email Service	575.98	700.00	-124.02	82.28 %
8170 Printing & Copying	6,458.38	500.00	5,958.38	1,291.68 %
8200 Area Offices		0.00	0.00	
8202 Northern Area		500.00	-500.00	
8203 Central Area		500.00	-500.00	
8204 Southern Area	500.00	500.00	0.00	100.00 %
Total 8200 Area Offices	500.00	1,500.00	-1,000.00	33.33 %
8210 Office Rent	1,115.15	1,237.27	-122.12	90.13 %
8230 Chair Discretionary Spending	90.00	1,000.00	-910.00	9.00 %

Libertarian Party of California

Budget vs. Actuals: Budget_FY25_P&L - FY25 P&L

January - December 2025

	TOTAL			
	ACTUAL	BUDGET	OVER BUDGET	% OF BUDGET
8290 Special Events				
8291 Event Meals	4.31		4.31	
Total 8290 Special Events	4.31		4.31	
8310 Travel, Meals and Meeting Expenses	238.75	500.00	-261.25	47.75 %
8400 Convention	22,826.15	25,000.00	-2,173.85	91.30 %
8512 Bank Services - Account Fees	227.78	0.00	227.78	
8520 Insurance - Liability & Casualty	610.00	800.00	-190.00	76.25 %
8560 Outside Computer Services	9,039.09	4,152.00	4,887.09	217.70 %
8570 Advertising		0.00	0.00	
8590 Credit Card & Transaction Processing	2,860.98	2,500.00	360.98	114.44 %
8650 Taxes, Licenses & Permits	2,410.00	50.00	2,360.00	4,820.00 %
Total Expenses	\$52,356.91	\$52,709.27	\$ -352.36	99.33 %
NET OPERATING INCOME	\$5,930.70	\$4,311.94	\$1,618.76	137.54 %
NET INCOME	\$5,930.70	\$4,311.94	\$1,618.76	137.54 %

Company name: Libertarian Party of California

Budget name: Budget_FY26_P&L

Budget type: Profit and loss

Period: FY 2026 (Jan 2026 - Dec 2026)

Consolidated

Accounts	Budget totals	Jan 2026	Feb 2026	Mar 2026	Apr 2026	May 2026	Jun 2026	Jul 2026	Aug 2026	Sep 2026	Oct 2026	Nov 2026	Dec 2026
Income													
4200 FEC Income	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
4210 FEC Donations	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
4220 FEC returns													
Total 4200 FEC Income	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
4a Donations													
401 Gifts-Unrestricted	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
4011 Gifts-Unrestricted-One Time	\$4000.00	333.33	333.33	333.33	333.33	333.33	333.33	333.33	333.33	333.33	333.33	333.33	333.37
4012 Gifts-Unrestricted-Recurring	\$1000.00	83.33	83.33	83.33	83.33	83.33	83.33	83.33	83.33	83.33	83.33	83.33	83.37
Total 401 Gifts-Unrestricted	\$5000.00	\$416.66	\$416.66	\$416.66	\$416.66	\$416.66	\$416.66	\$416.66	\$416.66	\$416.66	\$416.66	\$416.66	\$416.74
402 Gifts-Restricted													
4024 Gifts-Restricted-One Time													
4025 Gifts-Restricted-Recurring													
Total 402 Gifts-Restricted	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
4030 In-Kind Contributions													
4100 Candidate Support Income	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
4110 CSC Gifts-Unrestricted-One Time													
4120 CSC Gifts-Unrestricted-Recurring	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
4150 Transfers From LPC													
Total 4100 Candidate Support Income	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total 4a Donations	\$5000.00	\$416.66	\$416.66	\$416.66	\$416.66	\$416.66	\$416.66	\$416.66	\$416.66	\$416.66	\$416.66	\$416.66	\$416.74
5180 Subscription Fee Revenue													
5250 Receipts From County Dues Sharing													
5410 List Rental Revenue													
5700 Fees-Revenue													
5840 Tuition & Fees Income													
5a Membership Dues	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
5210 Renewal	\$7000.00	583.33	583.33	583.33	583.33	583.33	583.33	583.33	583.33	583.33	583.33	583.33	583.37

Accounts	Budget totals	Jan 2026	Feb 2026	Mar 2026	Apr 2026	May 2026	Jun 2026	Jul 2026	Aug 2026	Sep 2026	Oct 2026	Nov 2026	Dec 2026
5212 New Member	\$3000.00	250	250	250	250	250	250	250	250	250	250	250	250
5230 Revenue from Premiums	\$4500.00	375	375	375	375	375	375	375	375	375	375	375	375
Total 5a Membership Dues	\$14500.00	\$1208.33	\$1208.33	\$1208.33	\$1208.33	\$1208.33	\$1208.33	\$1208.33	\$1208.33	\$1208.33	\$1208.33	\$1208.33	\$1208.37
5b Materials-Revenue													
5100 Sales of Product Income													
5110 Outreach Material Revenue													
5120 Reimbursed Shipping													
Total 5b Materials-Revenue	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
5c Events-Revenue													
5500 Convention	\$30000.00	2500	2500	2500	2500	2500	2500	2500	2500	2500	2500	2500	2500
5540 State Convention Donations	\$8000.00		8000										
5550 Event Donation Revenue	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
5560 CSC Event Revenue													
5570 State Fair Donations													
Total 5c Events-Revenue	\$38000.00	\$2500.00	\$10500.00	\$2500.00	\$2500.00	\$2500.00	\$2500.00	\$2500.00	\$2500.00	\$2500.00	\$2500.00	\$2500.00	\$2500.00
5e Area Offices Income													
5601 Northern Area	\$500.00	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.63
5602 Central Area	\$500.00	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.63
5603 Southern Area	\$500.00	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.63
Total 5e Area Offices Income	\$1500.00	\$125.01	\$125.01	\$125.01	\$125.01	\$125.01	\$125.01	\$125.01	\$125.01	\$125.01	\$125.01	\$125.01	\$124.89
6000 Interest - Checking and Savings	\$6.00	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5
6899 Discounts given													
6934 Shipping Income													
6999 Uncategorized Income													
x Sales of Product Income													
PayPal Sales													
Unapplied Cash Payment Income													
Total Income	\$59006.00	\$4250.50	\$12250.50	\$4250.50	\$4250.50	\$4250.50	\$4250.50	\$4250.50	\$4250.50	\$4250.50	\$4250.50	\$4250.50	\$4250.50
Cost of Goods Sold													
y Cost of Goods Sold													
Total Cost of Goods Sold													
Expense													
6150 Bad Debts													
7020 County Dues Sharing	\$6000.00	3000	0	0	0	0	0	3000	0	0	0	0	0
7210 Wages & Salaries													

Accounts	Budget totals	Jan 2026	Feb 2026	Mar 2026	Apr 2026	May 2026	Jun 2026	Jul 2026	Aug 2026	Sep 2026	Oct 2026	Nov 2026	Dec 2026
7250 Payroll Taxes													
7510 Fundraising Fees													
7520 Accounting Fees	\$9600.00	800	800	800	800	800	800	800	800	800	800	800	800
7525 CPA Review													
7530 Legal Fees													
7540 Independent Contractor													
7541 News Letter													
7542 CSC Newsletter													
7550 Outside Consultant													
7560 IT Support													
7600 Campaign Support Committee													
7610 CSC Candidate Contributions													
Total 7600 Campaign Support Committee	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
7700 FEC Business Expenses	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
7710 FEC Fundraising Expenses													
7720 FEC Campaign Contributions	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
7730 FEC Operating Expenses	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
Total 7700 FEC Business Expenses	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
8110 Office Supplies	\$200.00	16.67	16.67	16.67	16.67	16.67	16.67	16.67	16.67	16.67	16.67	16.67	16.63
8130 Telephone & Telecommunications	\$1000.00	83.33	83.33	83.33	83.33	83.33	83.33	83.33	83.33	83.33	83.33	83.33	83.37
8134 Domain & Website Services	\$1200.00	100	100	100	100	100	100	100	100	100	100	100	100
8135 CSC Domain & Website Services													
8136 Internet Access Fees													
8140 Postage, Shipping, Freight & Delivery	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
8142 CSC Postage, Shipping, Freight & Delivery													
8144 FEC Postage, Shipping, Freight & Delivery													
8150 Bulk Mail Services													
8152 Bulk Email Services	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
8153 CSC Bulk Email services	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
8154 Email Service	\$700.00	58.33	58.33	58.33	58.33	58.33	58.33	58.33	58.33	58.33	58.33	58.33	58.37
8170 Printing & Copying	\$500.00	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.63

Accounts	Budget totals	Jan 2026	Feb 2026	Mar 2026	Apr 2026	May 2026	Jun 2026	Jul 2026	Aug 2026	Sep 2026	Oct 2026	Nov 2026	Dec 2026
8180 Books, Subscriptions & References													
8200 Area Offices													
8201 Northern Vice-Chair													
8202 Northern Area	\$500.00	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.63
8203 Central Area	\$500.00	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.63
8204 Southern Area	\$500.00	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.63
8205 Southern Vice-Chair													
Total 8200 Area Offices	\$1500.00	\$125.01	\$125.01	\$125.01	\$125.01	\$125.01	\$125.01	\$125.01	\$125.01	\$125.01	\$125.01	\$125.01	\$124.89
8210 Office Rent	\$1237.00	103.08	103.08	103.08	103.08	103.08	103.08	103.08	103.08	103.08	103.08	103.08	103.12
8220 Electricity, Gas, Heating, Water, Sewer													
8230 Chair Discretionary Spending	\$1000.00	83.33	83.33	83.33	83.33	83.33	83.33	83.33	83.33	83.33	83.33	83.33	83.37
8240 Membership Committee													
8250 Executive Director													
8260 Equipment Rental & Maintenance													
8290 Special Events	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
8291 Event Meals	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
8292 Event Facilities	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
8295 CSC Event Expenses													
Total 8290 Special Events	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
8310 Travel, Meals and Meeting Expenses	\$500.00	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.67	41.63
8320 Speaker, Entertainer Fees and Expenses													
8400 Convention	\$30000.00	8000	20000	0	0	0	0	0	0	2000	0	0	0
8512 Bank Services - Account Fees	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
8514 Bank Services CSC - Account Fees	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
8520 Insurance - Liability & Casualty	\$800.00	0	0	0	0	0	0	800	0	0	0	0	0
8530 Memberships in Other Organization													
8540 Tuition & Fees Expense													
8550 Equipment Purchases													
8560 Outside Computer Services	\$1200.00	100	100	100	100	100	100	100	100	100	100	100	100
8565 CSC Outside Computer Services	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
8570 Advertising													

Accounts	Budget totals	Jan 2026	Feb 2026	Mar 2026	Apr 2026	May 2026	Jun 2026	Jul 2026	Aug 2026	Sep 2026	Oct 2026	Nov 2026	Dec 2026
8571 CSC Advertising/Promotional													
8572 Promotional Products													
8574 Membership Promotions													
8580 On Line Store Fees													
8590 Credit Card & Transaction Processing	\$3519.00	293.25	293.25	293.25	293.25	293.25	293.25	293.25	293.25	293.25	293.25	293.25	293.25
8595 CSC Credit Card & Transaction Processing													
8596 FEC Credit Card & Transaction Processing													
8650 Taxes, Licenses & Permits	\$50.00	50	0	0	0	0		0	0	0	0	0	0
8651 CSC Taxes, Licenses & Permits													
8670 Miscellaneous Expense													
8680 Refunds													
8690 Transfers to CSC													
9999 Uncategorized Expense													
z Purchases													
Melio Service Fees													
PayPal Fees													
Unapplied Cash Bill Payment Expense													
Total Expense	\$59006.00	\$12896.34	\$21846.34	\$1846.34	\$1846.34	\$1846.34	\$1846.34	\$5646.34	\$1846.34	\$3846.34	\$1846.34	\$1846.34	\$1846.26
Other Income													
5490 Other Revenue	\$0.00	0	0	0	0	0	0	0	0	0	0	0	0
5492 Reimbursable Expense Income													
6932 Markup													
In-Kind Revenue													
Total Other Income	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Other Expense													
8000 Loss on Theft													
8660 Fines, Penalties & Judgments													
In-Kind Expense													
Other Miscellaneous Expense													
Reconciliation Discrepancies													
Total Other Expense	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total Net Income	\$0.00	\$-8645.84	\$-9595.84	\$2404.16	\$2404.16	\$2404.16	\$2404.16	\$-1395.84	\$2404.16	\$404.16	\$2404.16	\$2404.16	\$2404.24