

Libertarian National Judicial Committee

Petitioner: Hector Roos

VS

Respondent: Libertarian National Committee

Re: TO VOID THE ADOPTION OF THE
SPECIAL

INVESTIGATORY COMMITTEE

September 8, 2025

Amicus brief in support of the petitioner

By Andrew Chadderdon, LNC Region 1
Representative

Oct 26, 2025

Introduction

My introduction to this topic occurred with the notification to the LNC about the accusations regarding Freedom Calls, which were released in parallel with the pardoning of Ross Ulbricht, on approximately January 21, 2025. As a member of the LNC, I was called to a series of “informal” meetings in which LNC members were sworn to secrecy regarding the contents of the meetings. These meetings happened over several consecutive nights during that week, with the last informal meeting of that series occurring on Friday, January 24, 2025. Notably, to my recollection, no LNC member sought to downplay, disregard, or ‘brush under the rug’ the allegations; all supported investigating and addressing them. On the second night of these meetings, which was the first I was invited to, the LNC initiated two email ballots. One was to immediately terminate the contract with Freedom Calls; the other was to initiate an investigation into the allegations.

I was selected for the initial investigatory committee, formed under RONR provisions for disciplinary proceedings, to support the investigation. Throughout the remainder of the week, additional actions and demands continued to come from a select few LNC members. Notably, before any investigation began, certain LNC members steadfastly demanded Angela McArdle’s immediate resignation without substantiation of the allegations. These members knew of good-faith reasons, tied to ongoing, unrelated LNC business, that an immediate resignation could harm the LNC and its ongoing operations.



Kathy Yeniscavich (AZ) Yesterday at 5:21 PM

DO NOT SHARE:

Angela is resigning effective immediately. It was a professional and productive conversation. She will submit a letter of resignation later today. She has to discuss first with Kennedy people so I do not want this to leak prematurely and damage our relationship with them. She will call me back after she talks to them.

1. She has some legitimate stuff to wrap up. A few contracts to sign today (one legal, more detail on that tonight) and she will cc me. These are routine, nothing sketchy. She has a lot of passwords and 2FA that needs to be changed. As well as some bank logins linked to her SS number. It will take up to 2 weeks. She also has documents that we need for her records. I offered to work closely with her and Hannah on this to ensure it is done and also with as little drama as possible. We can discuss tonight and if everyone agrees we will memorialize this understanding in writing. Oliver agrees this is best practice.
2. I think we hold on firing Heise until Angela has turned everything in to us. I don't want to jeopardize our ability to operate smoothly by doing it immediately. It was a fucking nightmare when Krauss quit. We also need better procedures on that stuff.

3. She doesn't want a witch hunt. But we need an audit. I would like to discuss tonight not going thru the IC process but doing an internal audit. How we deal with results publicly could depend on the finding. Obviously if there are no employees that's one thing. If there are employees but productivity is sus because we didn't get them lists and the contract was written badly it's still a problem but different one.

More coming

But y'all are impatient

4. She would like to take the temperature down. This is on all of our best interests. If we find out she committed fraud then that will be a different story obviously. We let her resign on a high note. We finish out the KVF.

We can talk about all of this tonight. But let's circle the wagons and let her announce it.



Kathy Yeniscavich (AZ) Yesterday at 7:35 PM

Angela just texted me. Her resignation is delayed because she hasn't had an opportunity to talk to Glenn. He is traveling. She will talk to him as soon as he lands. She has to talk to him before she resigns so we don't fuck the JFC. (edited)



Meredith Hays (CA) Yesterday at 7:40 PM

I mean sounds plausible but also OF COURSE it's delayed



Kathy Yeniscavich (AZ) Yesterday at 7:41 PM

I think it's true. I tried to call Glenn and it went straight to vm

The above images are from the evening of January 24, 2025. They show the initial agreement, and the substantiation of the legitimacy of the delays in the later request to resign.

Nonetheless, when McArdle had some delays before she resigned, she was threatened with public (false) attacks and smearing, simply to ensure her prompt resignation before any investigation. Even after her resignation, she faced further smears, all before any investigation began. It would later become clear, particularly during the process of accepting the resignation, that the concern was to ensure that the seat would be vacant before the February 2, 2025 LNC meeting, so that Steven Nekhaila and his faction could seize the Chair position at that time, before anyone knew what was coming.

Kathy Yeniscavich (AZ) Today at 2:01 AM

Groups

FW: Resignation, Thank You, and Timeline 53 views

Inc-public_forward to Inc-p...@googlegroups.com 11:30 PM

From: Angela McArdle <angela...@fp.org>
Sent: Saturday, January 25, 2025 6:30:10 AM (UTC+00:00) Monrovia, Reykjavik
To: Inc-public_forward <Inc-public...@fp.org>
Subject: Resignation, Thank You, and Timeline

Hello Everyone,

I am taking on a new opportunity soon that will make it impossible for me to stay on as Chair, so I am resigning. I'm very grateful that I was able to help facilitate Ross's full pardon and release from prison before I left, and I will have a longer statement soon about my experience as chair and gratitude for the people who helped me accomplish so much in my two terms. I will continue to work closely with staff over the next few weeks to make sure we have strong successorship, brand identity, and a political strategy for the coming year. I will continue to support Michael Heise with his fundraising efforts for as long as I can, and would love to see him or Josiah Baker, the TN Chair, elevated to the board to fill vacancies.

Thank you all!

Angela McArdle
Chair, Libertarian National Committee

No and no

Meredith Hays (CA) Today at 2:15 AM
It sounds like she's saying I will be resigning, not I'm resigning NOW

Adrian F Malagon Today at 2:16 AM
This fucking cunt.

Adrian F Malagon Today at 2:16 AM
This fucking cunt.

Meredith Hays (CA) Today at 2:17 AM
I want to respond to her email and ask her to clarify She needs to make herself Explicit

Kathy Yeniscavich (AZ) Today at 2:22 AM
Yeah this was NOT what I understood in our convos. She called me back tonight and said she decided to do it tonight so as not to hit a big news cycle. But this will drag on forever because the bank will take forever. And the stuff about Heise and Josiah kisses me off. She told me Josiah was too busy and out of the question.

Meredith Hays (CA) Today at 2:25 AM
It sounds like "I'm gonna resign in 2 weeks" to me which is what she wanted to do anyway so I am not okay with this

@Kathy Yeniscavich (AZ) And the stuff about Heise and Josiah kisses me off. She told me Josiah was too busy and out of

Adrian F Malagon Today at 2:26 AM
I'm taking care of it. I'm having Meredith send out a motion to accept her resignation immediately. We need co-sponsors.

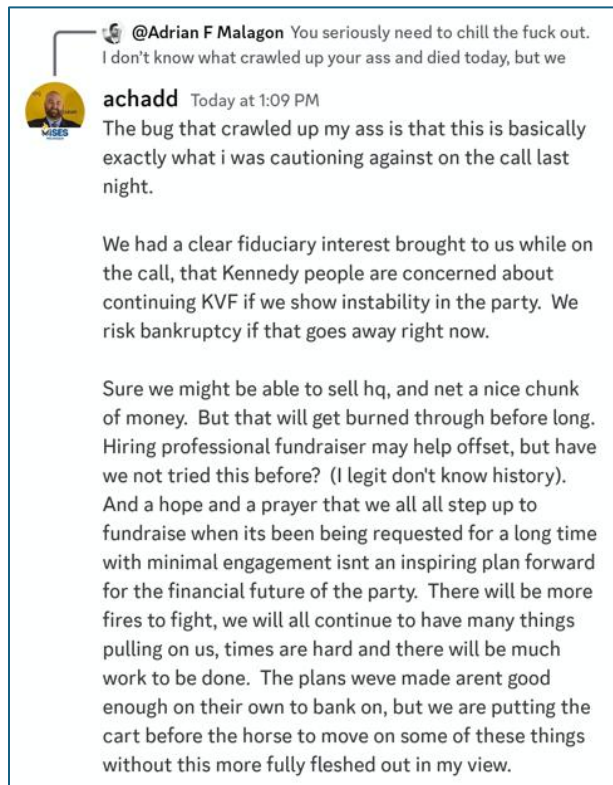
achadd Today at 2:36 AM
Jfc, take the fucking win, she resigned We said if she did that we let her set the narrative (edited)

Above screenshots occurred on Jan 25 in the early morning, demonstrating the vitriolic response even after McArdle resigned. After all, this delay jeopardized whether the Chair position would be vacant in time for the February 2, 2025 LNC meeting, which was necessary to complete the coup that this effort was designed to enact.

Following McArdle's resignation, I raised concerns about deceptive tactics, attempts to steer the chair election through unsubstantiated guilt-by-association, and other issues. Subsequently, efforts began to reshape the investigatory committee, seemingly to

exclude me. Ironically, the individual who was seated on the committee over me, Ben Weir, ultimately submitted his own Minority Report from the SIC, which echoes many of the same concerns that would be uncovered through the external inquiries and assessments of their report. He also stated that the committee operated as though it had a predetermined outcome that it sought evidence to affirm, instead of seeking to conduct an impartial investigation.

Further, after raising the concerns that would see me blocked from participating in the final Special Investigatory Committee, I made known to other LNC members that the behaviors I had seen were not acceptable to me, and absent explanations of the concerns, that I would disregard the previous commitments to secrecy and notify others in the party, including Chairs in Region 1, as is my responsibility as a region representative on the LNC. Despite my request for explanations of concerns, these were met with attacks and dogpiling. I was then promptly removed from all LNC discussions.



The image is a screenshot of a social media thread. At the top, a user with the handle @Adrian F Malagon has a greyed-out profile picture and a speech bubble containing the text: "@Adrian F Malagon You seriously need to chill the fuck out. I don't know what crawled up your ass and died today, but we". Below this, a user with the handle achadd has a circular profile picture and a speech bubble containing the text: "achadd Today at 1:09 PM The bug that crawled up my ass is that this is basically exactly what i was cautioning against on the call last night." Below the second message, there are two paragraphs of text. The first paragraph reads: "We had a clear fiduciary interest brought to us while on the call, that Kennedy people are concerned about continuing KVF if we show instability in the party. We risk bankruptcy if that goes away right now." The second paragraph reads: "Sure we might be able to sell hq, and net a nice chunk of money. But that will get burned through before long. Hiring professional fundraiser may help offset, but have we not tried this before? (I legit don't know history). And a hope and a prayer that we all all step up to fundraise when its been being requested for a long time with minimal engagement isnt an inspiring plan forward for the financial future of the party. There will be more fires to fight, we will all continue to have many things pulling on us, times are hard and there will be much work to be done. The plans weve made arent good enough on their own to bank on, but we are putting the cart before the horse to move on some of these things without this more fully fleshed out in my view."

We established last night, very explicitly, that there was no difference needed to our actions if she resigned by tuesday, she asked for extension til monday in light of the clear and valid concern above from kennedy folks. Yet we apparently pushed and demanded it happen last night. And now we didnt get what we wanted from her in form of immediate resignation and full cooperation. Absolutely could be the case that this was where she was gonna go on monday anyway, but now we'll never know. (edited)

Kennedy folks, in addition to concern for stability in the LP to continue the JFC, are concerned about his confirmation. As shown with the post from clint, margins are razor thin. You guys confident that some hater is not gonna send jake porter article, screenshot of IC motion and of her resignation, along with documentation of her administering the KVF, to some senator or someone who is against kennedy? I hope we didnt just directly blow up his confirmation!

Further if we did, we've been working to get members of the party from all around the country into jobs under kennedy. Ive got two people from michigan who are in evaluations and potentially interview pipeline to get jobs there. How many libertarians might (might have) been put into meaningful roles in the federal government under kennedy? If we fucked that up, those are all gone. Again, we had no urgency that her resignation had to be demanded yesterday in light of concerns from glenn.

It was raised why i whined about the long meetings, then was dragging it out on this argument. Clearly nobody else was gonna raise these concerns. Further why i wanted to be on the audit committee.

So here we are. We demanded her immediate resignation. Apparently we didnt get it. And we got more controversy. Might go bad, might not. Might end up on her if it goes bad, might not. But again, we wont know because we made a needless escalation last night instead of giving her time that would have had no reasonable impact on our course of action.



Meredith Hays (CA) Today at 1:20 PM

I think maybe you don't have enough first hand experience with Angela's lies



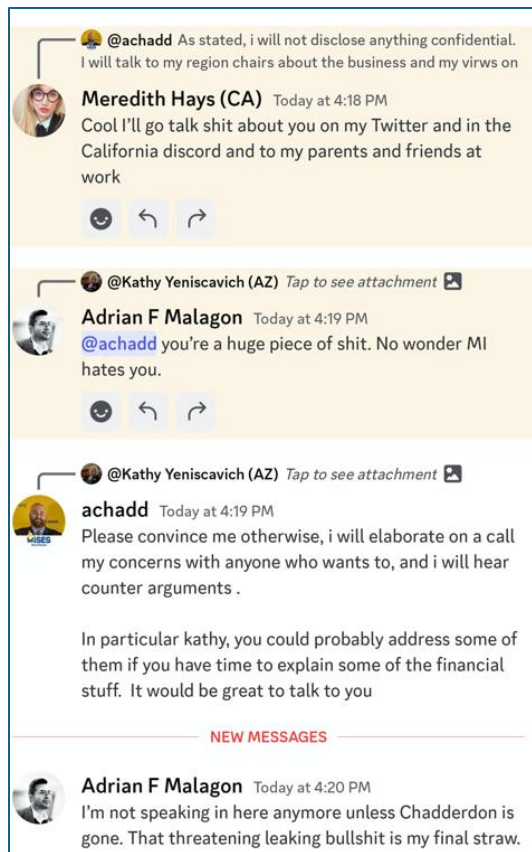
achadd Today at 1:22 PM

Please tell me where any aspect of that is not a valid consideration of fiduciary duty

And you may be right.

But i think that has exactly zero bearing on the argument i presented

Messages from January 25, 2025. Assertions about bankruptcy risks had been raised about several others, and the assessments in my message were largely based on concerns that had been raised by others on the LNC during prior days' discussions.



Messages from January 26, 2025, showing refusal to address raised concerns as I was soon kicked out of chats.

Opposition to SIC Report Adoption

When the SIC report was finally released just after 10am on June 8, 2025, in advance of the meeting to adopt the report on the evening of June 9, 2025, I spent a great deal of effort to thoroughly review the report in that short time. At numerous places throughout the report, substantial misrepresentations occur. Most notably, on numerous occasions, statements are presented in the executive summary or in the conclusion of the document which are contradicted by the supporting evidence in the body of the document. I ultimately compiled the results of my necessarily rushed analysis, and provided the notes from that analysis to Region 1 Chairs on June 14 to document the reason for my vote against the report.

The report is available here:

[https://drive.google.com/file/d/1e3h3eItyTyfmGE8ohMOAopRHsfDJY6QE/view?usp=drive link](https://drive.google.com/file/d/1e3h3eItyTyfmGE8ohMOAopRHsfDJY6QE/view?usp=drive_link)

Most significantly, the report refers to a W-9 form submitted related to Freedom Calls. On pages 3 and 9, the report cites this form as being improperly filled and refers to it as the primary element supporting the claim that the actions were deliberately concealed. However, on page 27, the fact is pointed out that the filing could be appropriate if a Form 8832 is submitted, which is acknowledged that the SIC didn't confirm if it had occurred.

Pg 3:

2. Concealment and Deception o Freedom Calls' Delaware registration and W-9 form were used to obscure Padgett's ownership.

Pg 9:

(6) Allowing Freedom Calls LLC to complete the W-9 in a manner that concealed the owner by failing to identify Padgett as the sole incorporator, in violation of IRS instructions.

Pg 27:

Pursuant to the IRS instructions, a single-member LLC is treated as a disregarded entity and activity should be reported on the owner's federal tax return, unless it files IRS Form 8832 electing to be treated as a corporation.

The statement buried in the body of the report contradicts the claims presented at the beginning for easy access to the unsupported claim while the full detail remains buried in the body of the report. In quick research, I find no suggestion that the question of whether Freedom Calls had a filed Form 8832 as "unlikely" as the SIC report suggests with no substantiation is a reasonable conclusion based on the evidence provided by the SIC. It is simply unknown, which if filed, could mean that there is no problem with the W-9. However, despite the claim that lack of participation would not be used as admission of wrong doing, the report proceeds to conclude the worst case outcome without evidence, after acknowledging that innocent explanations may exist. It was the responsibility of the SIC to answer this question conclusively, or their assertion of deliberate concealment loses their primary argument in support.

The SIC report also states objectively that the Freedom Calls contract was not fair and specifically not of reasonable value in exchange for the work. However, the basis for these claims are not well supported. Claims regarding the basis of comparison to industry averages simply claims that the references used are “all easily available online”. The SIC report claims \$9 an hour as the top scale of what a pay rate may be for Freedom Calls caller, and assumes a basis of approximately \$1400 a month cost for the work to be performed. However, a quick search on Grok suggests that for outsourcing calling operations for US political calls, costs can range from there to be as high as \$2500 a month for a single full time employee for US calling from the Philippines. Additionally, numerous factors are cited that negatively impact calling efficiency, including periods in which new lists were not delivered to Freedom Calls, reducing the calling capabilities temporarily. None of these factors are assessed with the SIC findings.

Lastly, on page 93 of the SIC report, it states:

The SIC has also reviewed the status of Vest v. McArdle and consulted with counsel regarding that case. The primary relief the plaintiff seeks is the removal of McArdle as Chair of the LNC. That has already happened. The SIC therefore concludes that continued litigation seeking such relief is not in the LNC’s best interest.

However, on page 4 it states:

The SIC has concluded that while the LNC may have valid claims for restitution, pursuing legal action is not advisable due to the high cost relative to potential recovery. Therefore, the SIC recommends against using general funds for litigation. However, if members wish to pursue the matter and secure sufficient dedicated donations or a pro bono attorney, the LNC could reconsider.

The report specifically states that litigation is not in the LNC’s best interest, yet it encourages fundraising from this claim to say that if funds are raised or pro bono work is offered, then it could pursue the matter (which it explicitly states is not in the LNCs interest). That further demonstrates financial impropriety. If the value from litigation is not there, that doesn’t change if someone else pays for it. It is just an acknowledgement that we would be ok with wasting other people’s money instead of

our own to achieve a political outcome based on misrepresentations in the SIC report. This is the definition of “sending good money after bad”.

The Cover Up

The SIC corruption cover up started from its very first introduction and adoption. The report was delivered for the first time to the LNC at 10:13am Eastern on Sunday, June 8, 2025. The meeting to adopt the report occurred the following evening, I believe at 8pm on Monday, June 9, 2025. For those with typical 9-5 jobs, and who happened to have other obligations on the weekend, that left little time for assessment and review, let alone critical analysis. In total, there were less than 36 hours allotted to review a 94 page report. In the meeting on June 9, the LNC allotted initially just 60 minutes, later expanded to 90 minutes to discuss the report prior to adoption. Despite the fact of having worked extensively to complete the review, and to take the notes that comprised the report that was provided to Region 1, I was allotted barely 3 min of discussion time to raise the concerns that I came across. Some of the issues that I raised in the report have since been disproven, but I have kept them in the report as the basis of the decision at that time. While some of the minor inconsistencies I initially raised against the SIC report were adequately answered, the core argument of misrepresentation still stands. In addition to the points already raised in this document and in the referenced report from June, the actions of the majority of the LNC have demonstrated beyond any doubt that there is collusion to conceal answers to numerous questions raised about the SIC report, and several individuals have worked deliberately and persistently to ensure that the LNC cannot be fully informed in its decision making process around the investigation.

Appurtenant Resolutions

In late August, a series of events occurred relating to the supplemental resolutions that were adopted with the SIC report. These resolutions are very significant for numerous reasons. First and foremost, they were the subject of a prior JC appeal, which was mooted just before the hearing, because Steven Nekhaila seemingly reversed his long and adamantly held position that there was no issue with the notice of the motions, or any other issues. During the June 9, 2025 meeting in which the motions were initially adopted, I had raised numerous points of order that these items were not in order for lack of notice. However, even though Nekhaila abruptly reversed his position, he tried to claim that there was nothing wrong.

Chair Nekhaila,

I believe there are breaches of order of a continuing nature (RONR 23.6) and I am raising two points of order in regards to the LNC meetings on June 9th and August 10th. I'm not interested in rehashing the merits, but I want to ensure correctness beyond a reasonable doubt and prevent future challenges.

June 9th, 2025 Resolutions

At the June 9th meeting, two resolutions were adopted (regarding fitness for roles in the party and seeking recovery of funds). These were original main motions under RONR.

LNC Policy Manual §1.02.1 requires that original main motions be either announced at a prior session with their purport entered into the minutes, or circulated with complete text by email at least 5 days before the meeting.

Neither of those requirements were satisfied. The agenda notice of item "Adoption of Motions Appurtenant to SIC Report" did not include complete text.

Notice rules are there to protect absentee members, and actions in violation of those rules are null and void (RONR 23.6(e)).

*I understand **that a point of order was made by Mr. Chadderdon during the meeting, and now this is the subject of a JC appeal**. Because this would be a breach of a continuing nature, the point of order can be made again. Although this could be ruled dilatory, I wanted to add my voice in agreement with Mr. Bost, Mr. Chadderdon, Mr. Dassing, Mr. Weir, Mr. Martin, and Mr. Watkins on the point of order that was made in order to give the committee another chance at addressing the procedural issue so we can stop fighting over it.*

[...]

- *Excerpt from August 18, 2025 email from Sam Bohler, “**Points of Order on June 9th Resolutions and August 10th Appointments**”, emphasis added*
-

Mr. Bohler,

I have reviewed your points of order.

First off, with respect to the June 9th resolutions, it is my judgment that the noticed items in the agenda were sufficiently in scope as adopted. The notice was for motions appurtenant to the SIC report,

[...]

However, in the spirit of cooperation, and to allow the LNC to move past these obstructions, I will rule your points well taken, making the June 9th resolutions (fitness and recovery), and the August 10th appointments (Coward and Knebel) null and void.

I am not conceding the merits of the motions, I am just trying to be prudent. Ruling this matter well taken will give us an opportunity to edify the record so that there is no reasonable misunderstanding of the LNC's position on these matters.

I am calling a Special Meeting for August 24, 2025, at 7:30PM EST, where we can adopt the resolutions and appointments anew and place these matters to rest.

[...]

- Excerpt from response from Steven Nekhaila on August 18, 2025

The issues that were raised in the appeal were first and foremost the issue with notice. However, additionally, there was the argument that because the resolution used the word “deem” that it was attempting to actively bar McArdle from holding any LP office in the future, which the LNC does not have the authority to do. Prior to the mooting of the

appeal, Jonathan McGee prepared and submitted a response to the JC regarding Mr. Jacobs appeal. In that response, he stated that:

The language used by the LNC with respect to the Bylaws Committee poses a problem for the appellants inferred meaning for the word “deems”. Specifically, the language that “encourages the Bylaws Committee to review and propose bylaws changes” implies that the LNC understands that the entire resolution is unenforceable in practice. If the LNC understands that it can’t even bind the actions of the Bylaws Committee, it would be risible to suggest that the LNC thinks that it can bind the future actions of delegates, affiliates, candidates, and the LNC itself. Furthermore, the very existence of the encouragement to the Bylaws Committee itself implies not only that the LNC understands that the resolution is unenforceable but also acknowledges that the appropriate remedy is to change the bylaws. If the LNC truly believed that merely deeming Angela McArdle unfit by resolution was sufficiently binding and enforceable there would be no need to review or propose bylaws changes at all.

– Excerpt from LNC Response to JC appeal regarding June 9 resolutions, written on behalf of LNC by Jonathan McGee

However, on August 16, 2025, a “remarkable email thread” occurred in which it became apparent that the above claims were misrepresentation. Initially, Nick Sarwark emailed the LNC and attempted to engage in settlement negotiations (also exposing secret negotiations that had happened between him, Sarwark not being affiliated formally with any party to the Vest vs LNC litigation, and some LNC members and counsel). However, in a response email, Nekhaila stated the following, while additionally adding Oliver Hall, LNC Special Counsel, intentionally in copy:

[...]

We had felt that all the goals of Ms. Vest had apparently been achieved, namely 1) McArdle is no longer Chair as she resigned and 2) the body has made a resolution that McArdle is unfit to serve as an officer

thereby satisfying denial of any future position, she me seek on the board.

From our perspective, the goal of the derivative suit is to the benefit the organization, paying Ms. Vests legal fees and adopting a derivative suit does not benefit the organization. Furthermore, there are substantial legal and financial considerations.

I, nor the LNC, had ever committed to taking up your offer. Furthermore, the LNC has done its duty in completing an independent and thorough investigation of McArdle's actions as showcased in the Special Investigatory Committee report.

– August 16, 2025 response from Steven Nekhaila to Nick Sarwark

The exchange between them was then quickly leaked, within a few hours, to appear in its entirety to that point on Third Party Watch, linked here:

<https://thirdpartywatch.com/2025/08/16/a-remarkable-email-thread-sarwark-and-Inc/>

Nekhaila's response is significant for many reasons. First, it directly contradicts the arguments that Nekhaila had seemingly approved no later than August 8, 2025, 8 days prior. He suggests to Sarwark specifically that the resolution adopted on June 9, 2025 did in fact permanently bar McArdle from holding office.

The message is also significant for its potential legal implications. After months of LNC Special Counsel referring to DC Statute 29-411.xx as governing derivative lawsuits. Notably, 29-411.07 states that a court may award fees to a plaintiff upon disposition of a case, if the court reasonably assesses that the case was in the benefit of the corporation. As Nekhaila lays out that the LNC has done all the things called for by Vest in her suit, and has affirmed through the misrepresentation in the SIC report that there was apparently wrongdoing by McArdle, this would appear to provide a strong basis for argument that Vest's suit was in the interest of the LNC, in direct contradiction to the conclusion presented in the SIC report on page 93:

Based on the foregoing, the SIC has determined that, although the LNC may have a viable claim or claims for restitution, litigation to pursue such action is not in the LNC's best interest, primarily because the financial cost would outweigh the potential gain, leading to a net loss for the LNC.

By stating that the litigation itself is not in the corporation's interest, but that all the assertions were valid, seems to walk the line of conceding the merits of the plaintiff's case. Coupled with other considerations described in this document, this supports a troubling pattern that began to emerge with sensitive legal details being disclosed without authorization and promptly being leaked to the media.

Revising the Appurtenant Resolutions

Following the interaction with Nick Sarwark, and resulting inquiries from LNC members as to why the prior secret negotiations had not been disclosed even to several members of the Executive Committee who are specifically tasked with managing ongoing litigation, cover-up efforts began to become increasingly apparent. After his contradicting assertion regarding "deem" language having enforceable power in the email to Sarwark, it was just 2 days before Nekhaila reversed course as described above to invalidate his prior ruling about the "appurtenant resolutions" validity. It is my firm belief that that reversal resulted from the concern over liability after Nekhaila was specifically called out for his contradiction of the arguments he approved for the JC within days prior. This necessitated the reaction to change that language and take that contradiction off the table after he had been caught in this manner. When the motions were reintroduced in the August 24, 2025 meeting, the language was changed, no longer asserting that the LNC "deemed" McArdele unfit. However, even in further direct questioning, Nekhaila and Hall continued to assert there was nothing wrong with the email communication to Sarwark.

In advance of the August 24, 2025 meeting, I sent a series of questions to Mr. Hall specifically asking these questions about the implications of the concerns with the email between Nekhaila and Sarwark, which I believe to have had critical implications on the consideration of whether to adopt the revised resolution. While the email was raised late, I requested guidance from counsel prior to the meeting which was not feasible unfortunately. I therefore pleaded with LNC members to delay the adoption until we could be properly advised by counsel. There was no legitimate reasonable need for urgency in the adoption. I requested any justification of such and received none. However, LNC members insisted on pushing the resolutions through without this guidance. This is the start of another disturbing pattern of forcing business through with specifically missing critical legal guidance on items of business.

Legal questions sent to counsel prior to adoption of revised resolutions:

[https://drive.google.com/file/d/1K44yLm-
oaY2hrsV48VuYSpZAhYh8ZpFe/view?usp=drive link](https://drive.google.com/file/d/1K44yLm-
oaY2hrsV48VuYSpZAhYh8ZpFe/view?usp=drive_link)

After the above series of events, I ended up formally invoking whistleblower status under the then-recently adopted Ethics Policy. I summarized the growing concerns that I had with the insufficient and increasing evasive support from counsel, along with the

growing pattern of coordination between the chair and counsel to systematically evade critical attorney-client responsibilities and deprive LNC members of necessary guidance.

https://drive.google.com/file/d/1MpHZH7NMVrF0j4bL7Z4aV7z_ewQ_IUK3/view?usp=drive_link

https://drive.google.com/file/d/1T71da_cRB58umOEh3LqZ76aFsB8J7R0o/view?usp=drive_link

Following the formal whistleblowing complaint on August 29, 2025, and the submission of the linked list of questions and concerns detailed in the linked file above, and after weeks of evasion of legal questions by the chair and counsel, a meeting was arranged on September 10, 2025 to allegedly have the questions answered. The concerns include multiple documented-in-writing instances of directly contradictory claims by counsel.

While we did not come close to answering all of the questions in the file above in that meeting, multiple key details were exposed. In raising questions regarding the violations claimed in the SIC report regarding Swing Vote Strategists, my concerns that the alleged violations were not based on transactions with the LNC, and were not to the disadvantage of the LNC were answered that it was still necessary to disclose relationships that may create undue influence on decision-making, which was cited as the core concern about McArdle's payment by SVS for performing administrative work specifically belonging otherwise to Team Kennedy. I raised the question that screenshots had been provided documenting pushing by Kathy Yeniscavich, a member of the SIC, for McArdle to accept payment for that work, and assurances that it was not in violation of LNC policy on similar grounds that I asserted above. Notably, even after encouraging this engagement, Yeniscavich still voted to classify the SVS engagement as a conflict despite her arguing to McArdle to the direct opposite.

Further in the meeting, I inquired with Bill Redpath about rumors that I had heard he had engaged in paid signature gathering and paid testimony on behalf of Kennedy and the KVF. He initially proudly declared that he had and gave further details about his ballot access testimony in Illinois and his petition gathering in New Mexico. Most concerning, he acknowledged that he performed ballot access petition gathering for Kennedy while he was in New Mexico, with travel and lodging paid by the LNC to help secure the Free New Mexico Party (our recognized New Mexico affiliate). While there, he also got paid by Kennedy to do ballot access signature gathering. He did not charge Kennedy any portion of the travel and lodging fees. By charging the LNC the complete amount for his travel and lodging, he was able to offer a no-overhead discount to help a

competing party while personally enriching himself through the costs being forced on the LNC. Had he appropriately split travel and boarding costs between the LNC and Kennedy, he would not have earned as much from Kennedy for profit and would have saved money belonging to the LNC that went to pay for his complete travel and boarding. His failure to disclose directly harmed the LNC, while directly providing material benefit to Redpath.

Coercion of New Mexico Chair by Leveraging Committed Legal Support

The attached folder has documentation of a scheme in which Steven Nekhaila and Paul Darr appear strongly to attempt to withhold committed legal support for ballot access litigation and trademark litigation to force his support to attempt to remove myself and Mr. Martin (and likely the whole Region 1 representative team) in order to stop our whistleblower investigations.

Full emails provided here:

<https://drive.google.com/drive/folders/1TUrmQuA9Td2eqAkxr5nzsOF9BxX2lhF0?usp=sharing>

My detailed explanation of the situation from LNC Public List:

<https://groups.google.com/g/lnc-public/c/yYQRx3YfvVQ>

Additional Summaries provided by Austin Martin:

<https://groups.google.com/g/lnc-public/c/HXiT0sCsdKg>

<https://groups.google.com/g/lnc-public/c/GOTAoGmDvik>

Denial of Access to Counsel – Akerman

In the LNC meeting on August 10, 2025, a motion was put forward from the EPCC to amend the policy manual to include a provision that access to counsel was to be restricted only to the Chair and the Executive Director. All other LNC members and staff would need to coordinate feedback through one of those individuals. However, this amendment was pointed out by Caryn Ann Harlos to be a potentially terrible policy and brought to the attention of the board. In the meeting, this measure was promptly stricken from the agenda and was never adopted. However, it has become the standard procedure between Nekhaila and Hall that they have systematically exploited their positions to repeatedly deny access to counsel, both to his own feedback, and to our litigation lawfirm, Akerman.

Going back to the September 10, 2025 meeting between LNC members and Oliver Hall, another issue that I raised questions regarding was with regard to the dismissal motion

filed in the Vest vs LNC litigation. Based on my experience in litigation in Michigan, I recognized the concern from the argument that claimed that because the Chair is defined as an officer of the LNC, that in the corporation LNC, Inc., the Chair is not a director of the corporation, but solely an officer. However, this is in direct contradiction to both advice I received from a highly experienced attorney specializing in political and corporate law. This opinion letter was further used by the LNC at the time as the basis to recognize the proper Libertarian Party of Michigan organization during the first stages of the Trademark litigation that the LNC successfully won.

Legal opinion from LPMI Attorney:

https://drive.google.com/file/d/1ESGPzOkwIXgR4LBzAq4IAqAQsojD0Gi9/view?usp=drive_link

Cease and Desist from LNC based on above letter:

https://drive.google.com/file/d/1Rz7dhheWPaET2E5KZJTMhjeitfjut8eu/view?usp=drive_link

In the opinion letter from Attorney Eric Doster, he states that:

LPM is the political party designated by the Libertarian National Committee as the affiliate of the Libertarian Party in the State of Michigan. As previously referenced, "Libertarian Party of Michigan Executive Committee, Inc." (State of Michigan Identification Number 800902778).is a Michigan nonprofit corporation. According to Article II of the Bylaws of "Libertarian Party of Michigan Executive Committee, Inc.":

"The LPM Bylaws are incorporated by reference in these Bylaws. In the event of any conflict between the LPM Bylaws and these Bylaws, the LPM Bylaws shall take precedence."

According to Article III of the LPM Bylaws:

"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, herein after 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.""

Consequently, members of the LPM Executive Committee (as established and recognized pursuant to the LPM Bylaws) automatically become officers and directors of “Libertarian Party of Michigan Executive Committee, Inc.” without further corporate action.

– Eric Doster, Attorney retained by LPMI on February 15, 2023

Note the explicit statement that while LPMI Bylaws establish that the Chair is specifically as an officer of the LPMI, the Chair is both an officer and director of the LPMI Executive Committee, Inc. corporation. Upon my investigation, not being a lawyer, I could not find any element that would distinguish Michigan non-profit law from DC or between the LPMI governing documents and the LNC’s regarding this consideration of the classification and identity of the board of directors.

Additionally, in the LNC, Inc. Articles of Incorporation, which were submitted to the court as an exhibit related to the motion to dismiss, the initial board of directors from 1995 is directly specified, and it notably includes the Chair from that time, Steve Dasbach as a director.

Given that the court case was just dismissed, and I agree with that as the correct outcome, I would not have raised this issue but for the fact that Caryn Ann Harlos raised the same consideration from a different argumentation position. She specifically suggests that this defect in the argument likely opens the LNC up to risk of having the case reopened/appealed/etc.

In the September 10, 2025 meeting, I specifically cited this concern to Oliver Hall. He was dismissive of the argument, while also saying that he did not have accountability or responsibility for the specific arguments raised by Akerman, our litigation representation. He suggested that I should contact them to raise the question. I proceeded with that, and upon a meeting being organized for Thursday, October 23, 2025, the LNC was informed by Nekhaila and Hall that any member who wished to discuss the pending litigation and the concerns with the submitted legal arguments would be required to sign a heavily restrictive NDA, claiming that “Akerman was requiring the agreement to be signed by anyone who was not in a retainer with Akerman”. However, LNC members, myself included, have repeatedly been permitted to engage in discussions related to the Vest vs LNC litigation, based only on the existing NDAs that all members had signed previously and prior to this ongoing controversy. This new NDA specifically called for preserving confidentiality not just of attorney client privileged communications or case details, but also “thoughts and impressions”.

WHEREAS, the Parties share a community of interest with respect to certain matters in connection with the Litigation, including, but not limited to, the duty and desire, to protect the interests of the LNC by, among other ways, protecting the confidentiality of attorney-client advice, communications, thoughts, mental impressions and strategies;

- NDA provided by Oliver Hall for meeting with LNC-retained counsel, Akerman

Under these terms, Region Representatives would not be able to perform their required duties to keep state chairs informed of their business and the basis for the decisions. This does not require to disclose confidential legal details, but the restrictions of sharing of “thoughts, mental impressions” etc, seemed far too broad to be reasonable. It is my firm belief that this demand was intended as a gag order to prevent disclosure of potential misconduct, and either originated from Hall/Nekhaila, or (if it came from Akerman) it was based on defamatory claims by Hall or Nekhaila against our whistleblower activities, as has been the sustained pattern after multiple concerning violations of duty have been documented between them.

Conclusion

While the matters in this report are quite substantive, they are barely scratching the surface of the complete picture of all the documented violations of duty and coverup activities that have occurred in response to our whistleblowing investigation. Members of the SIC have apparently taken every effort to create many distractions and barriers to the Region 1 representatives to prevent us from fulfilling our duties and serving our region. I am available to answer any questions or elaborate on any content from this response.