

**APPEAL TO THE NATIONAL LIBERTARIAN PARTY JUDICIAL COMMITTEE
(JC)**

**RE: SECOND REPLY TO JACOBS (EITHER AS AMICI OR RESPONDENT
ON BEHALF OF LNC)**

Appellant: Brittany Kosin on behalf of signatories to appeal

Appellee: Libertarian National Committee (LNC)

Date: January 30, 2025

Jurisdiction: LP Bylaws Articles 7.12 and 8.2

Bylaws Alleged to be Violated: Articles 7:14, 7:15, and 16 (incorporating
RONR)

Relevant RONR Provisions: Will be cited throughout as needed

Interested Parties: LNC and every national Libertarian Party Member

1. INTRODUCTION

Mr. Jacobs' reputation for an inability to let arguments rest remains unchallenged. While the JC is not an actual judicial body, the typical legal practice seems wise to follow: Petition>Response>Reply. The End. Additionally, at least to my knowledge, the LNC did not authorize this additional filing. The fact that a ballot is presently passing to authorize Mr. Jacobs to file the initial Response is irrelevant. It had not passed as of the time of his initial Response nor his Second Response.¹ Therefore, I request that Mr. Jacobs' second bite at the apple be rejected, and thus this Second Reply would be as well. However, if the JC finds it suitable to accept Mr. Jacobs' additional filing; then this is my Second Reply.

I will note once again that Mr. Jacobs did not interact with my substantive arguments regarding the Bylaws and Policy Manual, so this Second Reply will be limited to possible additional points raised.

¹ I ask that the JC note Mr. Jacobs' swipe at the Secretary lending credence to allegations about his intractable conflicts of interest to be involved in these matters. It is my understanding that the LNC just endured a mass email campaign that could explain a vote being misplaced. In any event, Mr. McGee's vote is properly recorded at this time, but all of this seems to me to just be another opportunity for Mr. Jacobs to insult someone he does not like. His hostile relationship with a member of the body he is claiming to represent is yet another of his conflicts for which it seems that wisdom should have informed him to decline the appointment.

2. STANDING

Yes, I do have the authority to maintain on behalf of the signatories that the failure of the LNC to respond does not constitute a default or admission as the signature petition form granted me wide authority, including the authority to accept a cure by the LNC which would be the best outcome. The resistance to just making a simple fix to resolve these issues and save the JC and everyone else a great deal of time over this issue is unfathomable to me.

3. EXECUTIVE SESSION

Mr. Jacobs states: “*Ms. Kosin seems not to under the argument being places.*” Despite the atrocious lack of proofreading care in his filing,² I do understand the argument, and I understand Mr. Jacobs’ deflection.

It is irrelevant that RONR gives a *why*. The Bylaws rejected it. End of story. Do Not Pass Go. Do Not Collect Two Hundred Dollars. I would refer the JC to my original Petition. He then claims that the LNC could just decide the risk of litigation is worth it, but that is not how fairness works. It is either allowed or not, and the LNC’s past actions show that the “libel concern” is a paper tiger. Due process and transparency to the membership, which is what the Bylaws are concerned about, require trials to be in public.

4. NOTICE

Mr. Jacobs only repeated his points that I refuted with one exception in which he circles back to the 2022 convention but does not cover his tracks. The Point of Order was based upon the Bylaws which is why a Point of Order was allowed. The delegates determined that full due process, including a trial was required. In RONR, reasonable notice is defined. Anything else is unreasonable and therefore not full due process. The time frame also does not fall under the items that RONR permits to be changed as already detailed in my Petition and my Reply.

His other two points were already completely disposed of in my Reply. I will just reiterate that it is in everyone’s best interest to want clarity. The very fact

² The entire Second Response of Mr. Jacobs is riddled with errors including misspelling Ms. McArdle’s name as “McArtle.” We all make errors. There may be a couple in this document, but the sheer amount made reading the Second Response difficult.

that there is a dispute over what rights are suspended and the designation of the Manager proves there is a lack of clarity.

Sincerely,
Brittany Kosin