

TO THE JUDICIAL COMMITTEE OF THE LIBERTARIAN PARTY

re Revocation of Affiliate Status of the Libertarian Party of New Hampshire

BRIEF OF AMICUS CURIAE JUSTIN O'DONNELL IN SUPPORT OF THE LIBERTARIAN NATIONAL COMMITTEE'S MAY 25, 2026 DECISION AND IN OPPOSITION TO THE PETITION FOR REVIEW AND REVERSAL

I: Statement of Interest

Amicus Justin O'Donnell is a lifetime member of both the national Libertarian Party and the Libertarian Party of New Hampshire. His interest in this matter is neither academic nor abstract because he has served the party for years as an organizer, activist, and statewide candidate. Crucially, following the turbulent 2021 leadership dispute in New Hampshire, Amicus served as the official campaign manager for Jeremy Kauffman's 2022 campaign for the United States Senate.

Having managed the political operations of the current LPNH Chair and worked directly within the machinery of the affiliate, Amicus possesses unique, firsthand operational knowledge of the continuous factional leadership of LPNH. This brief is submitted to assist the Judicial Committee by cutting through the administrative fictions presented in the July 2, 2026, Petition and demonstrating that disaffiliation was not only procedurally authorized under Article 5, Section 6, but also a long-overdue act of institutional self-preservation.

II: Summary of Argument

The LPNH Petition is a masterclass in desperate formalism. It fully concedes that the 2024 Donald Trump endorsement occurred, fully concedes that the grotesque social media record exists, and then attempts to launder both through a pristine change-of-leadership narrative, a highly selective misreading of *Robert's Rules of Order*, and an overwrought, comically histrionic analogy to the Spanish Inquisition.

The core argument that "new management" wipes away an affiliate's institutional violations is an organizational and logical absurdity that would render Article 5, Section 6 a dead letter. If an affiliate can escape the consequences of a direct, flagrant violation of Article 5, Section 4 simply by executing an administrative shift of officer titles, then national bylaws are functionally unenforceable.

Furthermore, the demand for a pre-disaffiliation Dixon-style inquest completely ignores that the 2021 precedent addressed rogue national interference in a state party, not a state party's continuous self-inflicted wounds. The claim that there was insufficient cause or unenumerated reasons utterly collapses under the weight of a public record available to every LNC member and convention delegate. This Committee should decline the invitation to micromanage the LNC's baseline political and organizational judgment and should roundly affirm the disaffiliation.

III: Argument

A: The "Former Leaders Did It" Defense Is Procedurally Bankrupt and Factually Fraudulent

Petitioner's central factual gambit is that the November 4, 2024, presidential endorsement of Donald Trump was merely the rogue act of a defunct Executive Committee whose members have never been elected to any office since. This is a transparent attempt to treat a state affiliate as a loose sequence of ephemeral, disconnected boards rather than a continuous party entity.

Bylaws Article 5 Section 4 explicitly prohibits affiliate parties, meaning the organizational entities themselves, from endorsing candidates of other parties. It does not contain a "musical chairs" carve-out where an affiliate can cleanse its record simply by shuffling its executive seats.

If accepted, Petitioner's theory would create a perpetual loophole where any state affiliate could flagrantly violate national bylaws, secure state-level political access or media attention for a major-party rival, suffer no consequences the moment those specific officers step down, and then demand total immunity on the ground that a new board has issued a retroactive resolution of contrition. Such a rule would reduce the LNC to a helpless spectator of cyclical affiliate misconduct.

Internal party tribunals and voluntary associations have long rejected the "new board, new sins" argument, and the Libertarian Party of New Hampshire remains the exact same affiliate entity that officially executed the Trump endorsement in 2024.

Furthermore, the "clean slate" defense is factually fraudulent. The notion that the current 2026 leadership team arrived as ideological virgins, untainted by the affiliate's recent behavior, is an insult to the intelligence of this Committee.

Amicus knows firsthand that Jeremy Kauffman, who is now Chair and the driving force behind this Petition, did not materialize out of thin air in March 2026. Kauffman was appointed Secretary at the exact same November 4, 2024, meeting where the Trump endorsement was executed. Since 2021, Kauffman has been the permanent, unchanging center of gravity for the LPNH communications committee, routinely and jokingly referring to himself as "the guy who made the tweet" during successive national public relations crises.

The definitive proof of this ongoing manipulation is documented in the appendix to this brief. This appendix includes public social media posts and private chat messages from Mr. Kauffman's personal accounts. These records cover the period from the 2024 presidential endorsement through the present day. They demonstrate a continuous and calculated campaign to steer the affiliate toward his preferred strategy. His influence over the prior board was absolute. The claim that the old board acted without his direction is a lie.

The absolute proof of this continuous, behind-the-scenes control is found in the very origin of

the November 4, 2024 board composition. The vote by the Executive Committee to nominate Kauffman to fill the vacancy on the board was only possible due to the sudden resignation of former Chair Joshua Holmes. Joshua Holmes resigned in disgust in September 2024 in the direct wake of Kauffman using the official LPNH social media account to post explicit calls for violence against the Vice President of the United States. This post was so radioactive that it resulted in Kauffman receiving investigatory visits at his home from FBI personnel.

Kauffman did not inherit a broken affiliate that he tried to rescue. He actively broke the affiliate, drove out its democratically elected Chair with threat-level public behavior, and then stepped directly into the leadership vacuum his own misconduct created.

The definitive proof that LPNH possesses a structural immunity to internal democratic correction is the documented history of the 2023 internal coup against its own constitutionally elected Chair, Conrad Nelson.

The July 2026 appeal relies on the fiction that the affiliate's dues-paying membership wields robust, correcting oversight over its leadership. The operational reality is that when Chair Conrad Nelson attempted to exercise standard executive oversight in 2023 to mitigate the reputational bleeding and brand-diluting statements coming from the messaging apparatus, the infrastructure did not adjust but instead mutated to protect the violation. Rather than finding constitutional compliance, Chair Nelson was met with an immediate, coordinated insurrection by the Executive Committee and the communications team.

Nelson was systematically and wrongfully run out of his position to preserve a practice of absolute deference to an unelected dictator of messaging. Following this coup, the LPNH leadership explicitly codified a practice where party policy and public messaging were entirely outsourced to Jeremy Kauffman.

The LNC did not execute an arbitrary action against a newly reformed, "innocent" leadership team in May 2026. It executed a long-overdue organizational penalty against a continuous brand-sabotage vehicle that explicitly overthrew its own elected chairmanship years prior to ensure that standard bylaws compliance could never interfere with its calculated provocations.

B: "For Cause" Does Not Require a Formal Trial or a Dixon Committee in Every Case

Petitioner's procedural objections, complaining of a lack of a formal, pre-vote investigatory committee and the supposed vagueness of "anti-Libertarian positions", rest on a fundamental misapprehension of what "for cause" means in the governance of a voluntary political association.

The Bylaws empower the LNC to revoke affiliate status "for cause." They do not import the full statutory apparatus of a state or federal courtroom, a civil deposition, or a multi-month discovery process. *Robert's Rules of Order*, which Petitioner weaponizes heavily, explicitly notes that ordinary societies should rarely hold formal trials and that procedures should match

the operational needs of the organization.

The LNC conducted its business in an open session, recorded on video, with ample opportunity for debate and amendment. Members openly debated the 2024 endorsement, the systematic undermining of our national ticket, and the cumulative damage to the brand. That is more than enough organizational due process for a voluntary association safeguarding its own intellectual property, message, and electoral ballot lines.

The 2021 Dixon Committee precedent, heavily relied upon by Petitioner, is completely irrelevant. That ad hoc committee was established to investigate a rogue national Chair Joe Bishop-Henchman, using his title to unilaterally pick a preferred faction and meddle in an internal state-party contest. It was never promulgated as a mandatory, permanent bureaucratic hurdle required before the national body can discipline an affiliate for overt, public misconduct.

To transform a one-time investigatory report into a permanent, non-bylaw barrier would be to rewrite the Party's constitution by judicial fiat, which is an overreach this Committee has historically rejected.

Finally, Petitioner's rhetorical flourish invoking Sir Walter Raleigh's 1603 protest against the Spanish Inquisition is organizationally absurd and comically desperate. The LNC's deliberations were neither secret, coercive, nor conducted in a dungeon. They were livestreamed to the entire world, debated on the record by elected representatives, and followed by formal written notice. Equating a standard disaffiliation vote to inquisitorial torture does not strengthen the party governance argument and instead merely underscores its histrionic and unserious character.

C: The Public Record Supplies Ample Cause Beyond the Single Endorsement

Petitioner repeatedly argues that the 2024 Trump endorsement was the only validly enumerated charge and that referencing "numerous anti-Libertarian positions" is too vague to constitute cause. This is pure sophistry.

The LNC was fully entitled to take notice of the affiliate's notorious public conduct, which was conduct so severe that it had already resulted in a formal LNC censure in September 2025 for official social media content widely condemned as antisemitic and inflammatory.

Rather than reforming their behavior, the LPNH leadership actively wore this censure as a badge of honor for making the right people upset.

The comparison to the Libertarian Party of Colorado is a false equivalency. While the Colorado situation had the potential to be treated similarly, members in Colorado actively took action to course-correct and protect the national ballot line. They prevented their own state leadership from following through on the proposal to violate the bylaws, and they self-repaired their internal damage, which rendered discipline to their affiliate a moot point. In contrast, the misconduct in New Hampshire was continuous, unrepentant, and hostile.

The disaffiliation vote followed years of official LPNH messaging that included calls to repeal the Civil Rights Act, proposals to legalize child labor, explicit threats of violence, and the targeted use of homophobic slurs to denigrate national presidential nominee Chase Oliver.

Jeremy Kauffman routinely defaults to homophobic slurs as a response to criticism and disagreement. During the 2026 national convention chair debate, which is recorded on the national party's own YouTube channel, he broke character and responded to hecklers with homophobic slurs. This pattern of behavior is further documented by video evidence from a board meeting of a private social club in Manchester, New Hampshire, where Kauffman acted in an erratic and violent manner, screaming profanities and homophobic slurs in the faces of attendees to bully them into compliance with his wishes.

Whether one accepts Petitioner's post-hoc, self-serving excuse that an official post questioning the 9/11 attacks was merely a high-IQ piece of satire by Kauffman is entirely beside the point. The LNC is not a linguistics department required to untangle the ironic layers of a state chair's edgelord trolling. It is an elected board of directors assessing real-world reputational harm and brand dilution to the national Party.

The 2024 Trump endorsement was merely the most blatant, explicitly indisputable violation of Article 5, Section 4. It did not occur in a vacuum. The LNC's motion accurately and properly described a long-term, incurable course of conduct. Forcing the LNC to append a multi-page bill of particulars reciting every single offensive tweet would elevate form over substance and perversely reward toxic affiliates that flood the zone with endless provocative material.

D: Petitioner's Requested Relief Would Reward and Prolong Rather Than Remedy Misconduct

Petitioner asks, in the alternative, for the formation of a Dixon-style investigatory committee. Such a committee would be entirely redundant. The factual record is completely public, thoroughly archived, searchable, and largely undisputed on its core operational points.

Granting an additional layer of administrative process would serve only one purpose, which is to artificially extend the window of time during which the national Party remains chained in the public eye to a state affiliate that has defined itself through calculated provocation.

The request to preserve the status quo pending appeal is equally unavailing. The harm the LNC sought to mitigate, including ongoing brand erosion, voter confusion, and the total demoralization of donors and members who joined a party that aspires to political seriousness, is occurring in real time.

Freezing the disaffiliation would convert this appellate process into a de facto veto against the LNC's clear political and organizational judgment.

IV: Conclusion

The Petition invites this Committee to substitute its own political preferences for those of the

democratically elected National Committee, to treat a superficial change in affiliate officer titles as a magic eraser of structural bylaws violations, and to invent procedural hurdles found nowhere in the text of the Bylaws. The invitation must be declined.

The LNC acted squarely within its Article 5 Section 6 authority, on a record that overwhelmingly supports a finding of cause, after years of escalating behavior that no reasonable observer could view as consistent with continued affiliation.

The disaffiliation should be affirmed, and the Petition should be denied in its entirety.

Respectfully submitted,

Justin O'Donnell

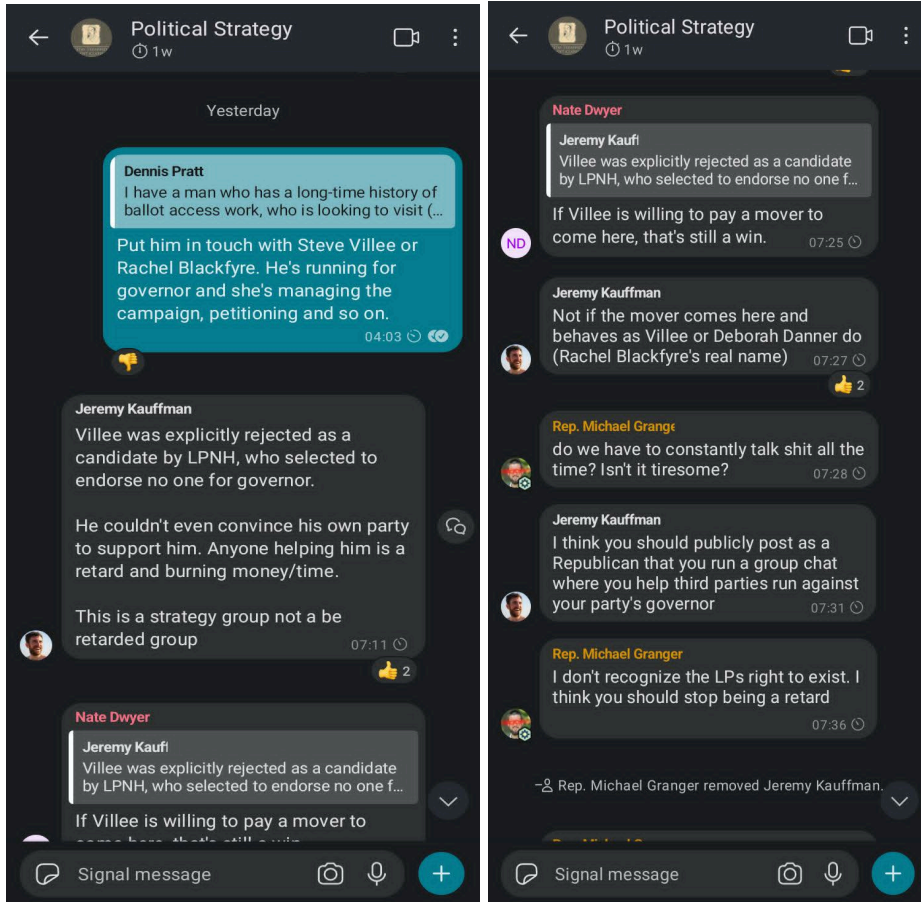
Lifetime Member, Libertarian Party and LPNH

Amicus Curiae

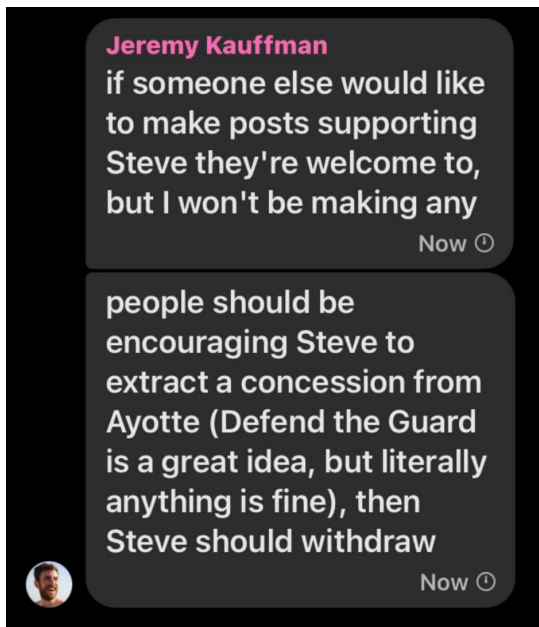
July 4, 2026

APPENDIX OF EVIDENCE AND REFERENCES

1. Article by Karlyn Borysenko about the Kauffman Comms Coup
<https://redpilldiaries.substack.com/p/the-internal-coup-to-wrongfully-remove>
2. Video of Kauffman's erratic public behavior and use of homophobic slurs at a private membership club's board meeting.
<https://www.youtube.com/watch?v=Yo7Undnuo08>
3. Video of Jeremy's removal from the board of The Free State Project for racist and antisocial behavior and for creating a public image detrimental to the organization.
<http://youtube.com/watch?v=ZmOaRzziz3U>
4. Screenshots of Jeremy Kauffman advocating against assisting, and disparaging support for LP Candidates in an NH-focused GOP Political Strategy Chat, and being removed for his belligerence.



5. A screenshot from Kauffman's advocacy against supporting LP Candidates from the LPNH comms channels during the 2024 election cycle, where he was in charge of the LPNH Communications Channels.



6. Tweets of Jeremy Kauffman, responding to the Chair of NH GOP, expressing frustration that NHGOP isn't grateful for his efforts to support them, by using LPNH communications channels to advocate for their alliance.



7. A series of screenshots of tweets from Jeremy Kauffman's personal accounts during the timeline of the 2024 Election, while he was the chair of the LPNH Communications Committee, openly advocating for Libertarians to back Donald Trump and steering his sphere of influence towards endorsing and voting for Republicans instead of Libertarians.

 **Jeremy Kauffman** 🦔 🌳 🌞 🇺🇸
@jeremykauffman Follow

Replying to @LibertyDogNH and @gunkslinger

Many Free Staters are in @lpmh primarily so that it doesn't become a force which is actively hostile to Free Staters and the liberty Republicans, as it was prior to 2021

8:39 AM · 29 May 24 · 3,072 Views

1 Quote 9 Likes

 **Jeremy Kauffman** 🦔 🌳 🌞 🇺🇸 @jere... · 02 Aug 24 🔄 ⋮

Voting for anyone other than **Trump** is stupid, but it's also stupid to forget **Trump** doesn't really care about guns and has few sincere political beliefs.

Trump will move to the middle on any issue he's allowed to.

🗨️ 66 ↻ 31 ❤️ 483 📊 12.6K 📌 🔗

 **Jeremy Kauffman** 🦔 🌳 🌞 🇺🇸 @jere... · 06 Jun 24 🔄 ⋮

Vivek Ramaswamy is the number one reason for libertarians to support **Trump**.

Vivek understands how to do the dismantling that **Trump** wants to do, but doesn't have the orientation for.

If **Trump** doesn't make Vivek VP, he needs another way to make it clear Vivek is his guy.

 **Kathy Barnette** 🇺🇸 @Kathy4Truth · 06 Jun 24
Where's @VivekGRamaswamy's name?

🗨️ 111 ↻ 55 ❤️ 642 📊 26.1K 📌 🔗

 **Jeremy Kauffman** 🌲🌲🌲🌲 @jere... · 26 Oct 24 ↻ ⋮
I've been a member of the Libertarian Party since 2004.

I've repeatedly voted Libertarian for President.

I moved to New Hampshire to dedicate my life to achieving a libertarian polity.

Libertarians should vote for Donald **Trump** this year.

 **Dave Smith** 🔵 @ComicDaveSmith · 25 Oct 24
I've been a member of the Libertarian Party since 2018. As I have stated over and over again, I am NOT loyal to the party. Party loyalty is stupid and it's particularly ridiculous from libertarians.
...

💬 75 ↻ 249 ❤️ 2.6K 📊 105K 📌 🔗

 **Jeremy Kauffman** 🌲🌲🌲🌲 @jere... · 08 Jun 24 ↻ ⋮
America needs a **Trump**-Massie alliance.

America First is libertarian nationalism.

 **Dave Smith** 🔵 @ComicDaveSmith · 08 Jun 24
Thomas Massie is more America First than Donald Trump and it's not even close.

💬 53 ↻ 47 ❤️ 499 📊 27.9K 📌 🔗