

APPEAL TO THE JUDICIAL COMMITTEE OF THE LIBERTARIAN PARTY

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

PETITIONER’S REPLY BRIEF AND MOTION

*Filed pursuant to LP Bylaws Art. 5 §6 and Art. 8 §2(a), and JC Rule of Appellate
Procedure 2.3.*

I. Preliminary Statement

Petitioner, the Libertarian Party of New Hampshire (“LPNH”), respectfully submits this Reply Brief and Motion, in part in response to the brief of the Libertarian National Committee (“LNC”). As set forth below, the LNC’s brief misapplies Robert’s Rules on rescission and elides the dispositive question of what “for cause” means. Petitioner replies to the LNC’s arguments in turn.

Petitioner also brings two requests for relief before this Committee. First, the LPNH moves that the Committee reconsider any decision to deny affiliates the right to file amicus briefs and accept amicus briefs into the record as pleadings on behalf of filing affiliates. Second, the LPNH asks that the Committee consider the merits of Amicus Ciesielski’s argument before, if appropriate, turning to the question of the

LPNH's disaffiliation. Both motions are presented in Part III and enumerated in the Prayer for Relief.

II. Reply to Respondent's Brief

A. This is not a hearing on Jeremy Kauffman's conduct or his membership.

1. The LNC's brief places significant emphasis on statements made by Jeremy Kauffman in his personal capacity, and multiple amici assert—without evidence—that Kauffman unilaterally controls the LPNH. This is not a hearing on the Libertarian Party membership of Jeremy Kauffman or on his personal conduct.
2. Kauffman's conduct was not noticed as part of the basis for the disaffiliation of the LPNH and is not properly before this Committee.¹

B. The Dixon Committee procedure remains binding.

3. The LNC asserts that the Dixon Committee did not establish a “sort of landmark or touchstone with regards to investigatory committees.” LNC Br. at 7. Yet this is precisely what the LNC's own resolution creating the Dixon Committee charged it with doing.

¹ Certainly, if the LPNH is in some sense corporately accountable for the years-old conduct of prior leaders whom it now disavows, then the personal conduct of Kauffman or of other individuals cannot weigh against the LPNH here.

4. The LNC’s motion expressly charged the Dixon Committee to “set forth a model of investigating internal matters,” further elaborating that the Dixon Committee must “set forth a model of investigating internal issues not covered by the Judicial Committee, Bylaws, and Policy Manual.” *Investigatory Committee of the Libertarian Party of New Hampshire* at 8–9.
5. The resolution itself then ordered that the Dixon Committee interview witnesses, examine evidence, and make findings. *Id.* at 8–9.
6. The LNC cannot have it both ways. It insists that, because prior LPNH leaders voted to endorse Donald Trump, the LPNH is bound by that endorsement despite having disavowed and repudiated it. Yet a previous LNC passed a 2021 resolution affirming that the Dixon Committee would set forth a “model of investigating internal matters”—expressly including an investigation, enumerated findings, and specific recommendations.
7. To whatever extent the LPNH is accountable for the years-old endorsement of Trump, the LNC is equally bound by its own resolution to reach any such conclusion through a Dixon-like investigative committee.
8. Robert’s Rules themselves embody a preference against instability. *See* Robert’s Rules of Order Newly Revised (12th ed. 2020) (“RONR”), at 61–62 (Principles Underlying Parliamentary Law) (“[A]s a protection against instability... the requirements for changing a previous action are greater than those for taking the action in the first place.”).

C. The LNC’s “rescission” argument is neither here nor there.

9. The LNC argues that, “[a]s a motion to disaffiliate exercises the power of the National Committee to revoke the status of any affiliate party, it is de facto a motion to rescind,” and that Robert’s Rules require “a two-thirds vote” for an act of rescission. LNC Br. at 3 (citing RONR 35:2(7)).
10. The LNC takes Robert’s Rules’ provisions on rescission out of context and misapplies them. Whether the disaffiliation vote is characterized as a motion to rescind is beside the point—and does not change what the term “for cause” means.
11. The statement in Robert’s Rules that rescission requires “a two-thirds vote” is an exception to the default rule that, “to become the act or choice of the body, a proposition must be adopted by a majority vote.” *Cf.* RONR 1:6; 35:2(7). The point of the provision is that rescinding a previous action requires a higher threshold than taking the action in the first place.
12. It does not follow that any action which can be characterized as a “rescission” may be taken at will, by a bare two-thirds vote, with no other process.

D. The LNC elides the question of what “for cause” means.

13. The LNC’s brief states that disaffiliating an affiliate is not removing an officer, concludes that “for cause” in the disaffiliation context means something different than in the officer-removal context, and then asserts that “for cause”

in the disaffiliation context effectively means “at will.” Both of these inferential steps are question-begging.

14. “For cause” cannot have a specific legal and parliamentary meaning in the officer-removal context yet effectively mean “at will” in the disaffiliation context. A change in context from officer removal to disaffiliation does not reverse the meaning of the limiting term “for cause.”
15. Robert’s Rules themselves disfavor these sorts of *ad hoc*, contradictory interpretations of terms. *See* RONR 56:68 (“If a bylaw is ambiguous, it must be interpreted, if possible, in harmony with the other bylaws.”); *id.* (Principle of Interpretation 2: “When a provision of the bylaws is susceptible to two meanings, one of which conflicts with or renders absurd another bylaw provision, and the other meaning does not, the latter must be taken as the true meaning.”).
16. The Committee should therefore ask *why* “for cause” has a particular meaning in the officer-removal context, and then consider whether those reasons also control in the disaffiliation context. There are at least two reasons that they do.
17. First, bylaws are a contract between the Libertarian Party and its affiliates, and terms in the bylaws therefore carry legal meaning. In the context of a voluntary association, “for cause” legally entails fundamental procedural fairness. *See, e.g., Campbell v. Loew’s, Inc.*, 36 Del. Ch. 563, 575 (Del. Ch. 1957) (“[I]t is certainly true that when the shareholders attempt to remove a director

for cause, there must be the service of specific charges, adequate notice and full opportunity of meeting the accusation.”).

18. Second, the Bylaws themselves supply a meaning of “for cause” by incorporating Robert’s Rules. Article 16 of the Bylaws provides: “The rules contained in the current edition of Robert’s Rules of Order... shall govern the Party in all cases to which they are applicable and in which they are not inconsistent with these bylaws and any special rules of order adopted by the Party.”
19. “For cause” is consistently used in Robert’s Rules to refer to a disciplinary procedure with noticed charges, an investigation, and findings of fact. Robert’s Rule 62:16, for example, states that a fixed-term officer “can be removed from office only for cause ... in accordance with the procedures described in 63; that is, an investigating committee must be appointed, charges must be preferred, and a formal trial must be held.”
20. Robert’s Rules consistently discuss “for cause” sanctions as encompassing a disciplinary hearing with notice of particularized charges, an investigation, and findings of fact. *See* RONR 56:30 (“removed from office for cause by disciplinary proceedings as provided in the parliamentary authority”); 62:16 (“removed from office only for cause ... in accordance with the procedures described in 63”); 63:1 (“the removal of an officer for cause, or the discipline of a member for improper conduct, may require that charges be preferred and that a formal trial be held”).

21. The LNC appears to concede that the meaning of “for cause” in RONR 63:24, at least, has some relevance to this hearing. *Cf.* LNC Br. at 5. Yet Rules 61 through 63 of Robert’s Rules function as an integrated whole. 62:16 defines removal “for cause” by reference to the procedures described in 63, while 63:1 explains removal for cause by reference to the procedures “explained in 61 and 62.”
22. Relevant to—and beyond—the narrow question of what “for cause” means, Robert’s Rules provide that a fair disciplinary process with an investigatory committee, formal notice to the accused, and a trial is the norm and the default in any disciplinary matter. The “basic steps” of a fair disciplinary process, which “must be followed” in the absence of special procedures, are “(1) confidential investigation by a committee; (2) report of the committee, and preferral of charges if warranted; (3) formal notification of the accused; (4) trial; and (5) the assembly’s review of a trial committee’s findings (if the trial has been held in a committee instead of the assembly of the society).” RONR 63:7.
23. Even if the Committee agrees with the LNC that the meaning of “for cause” is ambiguous, an ambiguous bylaw “must be interpreted, if possible, in harmony with the other bylaws” and in the manner that does not conflict with or render absurd other bylaw provisions. RONR 56:68.
24. Indeed, this Committee in *Phillies* found the meaning of “for cause” ambiguous in the officer-termination context as well. *Phillies* at 8–9 (“We encountered difficulty with the definition of ‘for cause.’”). Yet the Committee did not default

to interpreting “for cause” to mean “at will.” *Cf. Phillies* at 4 (“Beyond such authorization, requirement of ‘cause,’ and vote basis for suspension, the Bylaws provide no procedure with regard to the taking of disciplinary action against Party officers to determine whether ‘cause’ sufficient to remove from office does, in fact, exist.”).

E. The New Mexico disaffiliation vote is inapposite.

25. The LNC and various amici cite the disaffiliation of the Libertarian Party of New Mexico (“LPNM”) for the proposition that no notice, investigation, or trial findings are ever required to disaffiliate any affiliate. This argument relies on an understanding of the New Mexico disaffiliation that was not shared by any LNC member—nor by the LPNM itself—at the time.
26. On July 23, 2022, the LNC met online and heard complaints from LPNM members regarding the LPNM’s July 12, 2022 online “Constitutional Convention.”
27. On July 31, 2022, the LNC met in person and passed a motion concluding that the LPNM’s Constitutional Convention was “null and void” due to “multiple violations of the LPNM’s own Constitution and Bylaws and basic parliamentary procedure.” *See Exhibit A* (Aug. 9, 2022 letter from LNC Chair Angela McArdle to the LPNM Executive Committee).
28. By the same letter, Chair McArdle, on behalf of the LNC, requested that the LPNM acknowledge that its prior, March 27, 2021 governing documents

remained operative, failing which “the LNC may need to consider other options in order to protect our branding and preserve the rights of aggrieved members of the LPNM.” **Exhibit A.**

29. On August 25, 2022, the LPNM publicly elected to terminate its own affiliate relationship, informing Chair McArdle that the LPNM had “terminated our affiliation with the Libertarian National Committee, Inc. (LNC) and all of its subsidiary bodies, effective immediately,” and publishing that letter as part of a press release entitled “The Libertarian Party of New Mexico (LPNM) Announces Its Independence from the LNC.” *See Exhibit B* (“LPNM is no longer an affiliate of the LNC All connections between us whatsoever are now totally and completely severed.”).
30. As described by Amicus Hagopian, the LNC’s vote to disaffiliate the LPNM was fundamentally a reaction to the LPNM’s attempt to “sever the affiliate relationship on its own.” Hagopian Amicus Br. at 6.
31. The idea that the LPNM disaffiliation vote establishes the minimum procedural threshold for a contested disaffiliation like this one is akin to arguing that, because a criminal defendant voluntarily waived certain constitutional or procedural rights, other defendants are no longer permitted to invoke those same rights.

F. This JC appeal is not a trial.

32. In determining whether the “for cause” standard and other provisions of Robert’s Rules have been satisfied, the Committee should not consider this appeal to be akin to the investigation or trial contemplated by Robert’s Rules or by the 2021 Dixon Committee motion and report.
33. This Committee’s own formal rules are styled the “Rules of Appellate Procedure.” The Committee’s rules thus presuppose that a proceeding before this Committee is appellate in nature—not the investigation or trial that Robert’s Rules require.
34. This Committee’s 2024 opinion in *Phillies* makes this clear. There, the LNC established an Investigatory Committee which investigated charges against Party Secretary Caryn Ann Harlos and found that she had committed both gross misconduct and conduct that disturbed the well-being of the Libertarian Party.
35. On appeal, this Committee found, *inter alia*, that even accepting the Investigatory Committee’s findings as correct, the LNC had failed to properly allege the specific charges against Harlos, and that the “accused has the right to be apprised precisely of the conduct in which she is alleged to have engaged that satisfies the charge... to prepare for the scope of evidence she will have to face at trial.” *Phillies* at 7–8.
36. The Committee explained that, although “[i]t may well be the case that [Party Secretary Caryn Ann] Harlos’ conduct did rise to the level of gross malfeasance,

and that *the IC report does find as such* ... failure to allege conduct that meets all the elements of a charge is a fatal defect.” *Id.* (emphasis added).

37. In interpreting the meaning of “for cause,” the Judicial Committee in *Phillies* correctly understood itself to be an appellate body reviewing procedural defects in the original Investigatory Committee proceeding.
38. The conclusions or appellate arguments of the Investigatory Committee could not themselves have functioned as the notice Harlos was owed—even though this Committee wrote that “[i]t may well be” that the IC report established that Harlos had committed gross misconduct. If a Judicial Committee hearing could itself amount to an investigation or trial under Robert’s Rules, this reasoning in *Phillies* would be rendered meaningless.
39. This Committee should adhere to this interpretation, not only because it is correct, but for general reasons of procedural stability and on account of the preference against inconsistency found throughout Robert’s Rules.

III. Motion

A. Affiliates qua affiliates should not be denied the right to file briefs in this proceeding.

40. The LPNH is aware that between six and nine Libertarian Party affiliates have, at various points, sought to file amicus briefs in support of LPNH, but that all such briefs have so far been categorically rejected for changing reasons—initially procedural and later on the ground that affiliates are not “persons” and therefore cannot file amicus briefs.

41. The LPNH agrees with those affiliates that the Bylaws and this Committee's rules require that all Libertarian Party affiliates be permitted to submit pleadings as legal persons in a disaffiliation appeal—especially where the subject of the dispute is the disaffiliation process itself. Petitioner particularly notes that LP Bylaws Art. 5 §6 clearly refers to, at minimum, the LNC and the LPNH as “interested persons.”
42. Additionally, this case will be unfairly prejudiced against the Petitioner—an affiliate asserting its interests as a corporate person—if all other affiliates are *a priori* prohibited from being heard as distinct persons at all.
43. Robert's Rules, which are incorporated in the Party's bylaws, recognize inherent “subgroup” rights to be heard: “Each individual or subgroup has the right to make the maximum effort to have his, her, or its position declared the will of the assembly to the extent that can be tolerated in the interests of the entire body.” RONR, at 61–62 (Principles Underlying Parliamentary Law).
44. Accordingly, the LPNH moves that the Committee specify any grounds on which affiliate briefs have been denied, reconsider any Committee decision to deny affiliates the right to file amicus briefs, and accept amicus briefs into the record—not as abstract arguments, but as pleadings on behalf of the filing affiliates as persons with distinct interests. *Cf.* RONR, at 61–62 (Principles Underlying Parliamentary Law).

B. The LPNH preserves its objections to the JC's selection.

45. Some amici could be read to characterize the LPNH as accepting the method by which the present Judicial Committee was chosen. To be clear, the LPNH echoes Amicus Nickolas Ciesielski's arguments regarding the selection of this Committee—including that a quorum was required to appoint additional Judicial Committee members—and incorporates those arguments by reference.
46. The LPNH accordingly joins Amicus Ciesielski by moving that this Committee first consider the merits of Ciesielski's argument before, if appropriate, addressing the substance of the LPNH's principal arguments.
47. The LPNH's principal arguments do not depend on the Committee's composition, and the LPNH therefore presents the selection issue through Amicus Ciesielski's briefing rather than its own.

IV. Prayer for Relief

For the foregoing reasons, the LPNH respectfully moves this Committee for two forms of relief.

WHEREFORE, Petitioner respectfully requests that the Judicial Committee:

1. Specify any grounds on which affiliate amicus briefs have been denied; reconsider any Committee decision to deny affiliates the right to file amicus briefs; and accept amicus briefs into the record as pleadings on behalf of the filing affiliates as persons with distinct interests;

2. First consider the merits of Amicus Ciesielski's argument before, if appropriate, addressing the substance of the LPNH's principal arguments;
3. Reverse the National Committee's purported revocation and order reinstatement of LPNH as the recognized state-level affiliate, together with all relief incidental to making reinstatement effective; or
4. In the alternative, order the formation of a Dixon investigatory committee pursuant to the LNC's June 2021 motion on the Jarvis matter and the Dixon Committee model, charged with interviewing witnesses, examining evidence, undertaking reasoned analysis, and reporting enumerated findings and recommendations to the Libertarian National Committee before any disaffiliation action takes effect; and
5. Grant such further relief as this Committee deems just and proper.

V. Exhibits

A — August 9, 2022 letter from LNC Chair Angela McArdle to the Executive Committee of the Libertarian Party of New Mexico.

B — August 25, 2022 LPNM letter and announcement, "The Libertarian Party of New Mexico (LPNM) Announces Its Independence from the LNC."

Respectfully submitted this 8th day of August, 2026,

A handwritten signature in black ink, reading "Ian B. Huyett", with a long horizontal flourish extending to the right.

Ian B. Huyett, Esq.
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Certificate of Service

I certify that on August 8, 2026 true copies of this Reply Brief and Motion, with attached Exhibits, were served by electronic mail on the Chair of the Judicial Committee; the Secretary of the Libertarian Party; and the Chair of the Libertarian National Committee.

A handwritten signature in black ink, reading "Ian B. Huyett", with a long horizontal flourish extending to the right.

Ian B. Huyett, Esq.
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Exhibit A



Angela McArdle, Chair
Libertarian National Committee
1444 Duke St.
Alexandria, VA 22314

August 9, 2022

Re: Recent Decision of the LNC Re: Libertarian Party of New Mexico's Constitutional Convention

To the Executive Committee of the Libertarian Party of New Mexico:

On July 23, 2022, the Libertarian National Committee ("LNC") met online for several hours and heard complaints from members of the Libertarian Party of New Mexico ("LPNM") regarding its most recent online convention held on or about July 12, 2022 (hereafter, "Constitutional Convention"). The representatives of LPNM listed on its website were invited and did not attend or respond in any manner. At the end of the meeting, notice was given for the upcoming in-person meeting at the end of July to hear a motion to recognize that LPNM's Constitutional Convention was illegitimate due to multiple violations of the LPNM's own Constitution and Bylaws and basic parliamentary procedure; and, therefore any alleged amendments to the LPNM governing documents were invalid and the prior Constitution and Bylaws still stood in effect. These violations include, but are not necessarily limited to, the following:

1. Notice was not properly given of the Constitutional Convention as per the LPNM Constitution and Bylaws;
2. Notice was not properly given of the amendments to be considered at the Constitutional Convention as per the LPNM's parliamentary authority;
3. Qualified members of a sufficient number to affect the results were not properly notified of the Constitutional Convention and/or permitted to attend and vote;
4. Electronic conventions are not permitted under the LPNM Constitution and Bylaws (research performed did not show evidence that any prior state proclamations to allow such under emergency powers were still in effect)

These deficiencies were reviewed by the LNC's Parliamentarian, Richard Brown, who agreed that the above-stated violations render any actions taken at the Constitutional Convention to be null and void. ***Please note that these violations are severable and any one of them on their own would be enough to nullify any results of the Constitutional Convention.***

On July 31, 2022, the LNC met in person and passed a motion containing the following conclusions:

- The Constitutional Convention held on July 12, 2022, was null and void
- The LNC recognizes the official Constitution and Bylaws of the LPNM as those adopted March 27, 2021.

The LNC is required to maintain a list of current state affiliate bylaws, per article 2.5. The LNC requests your acknowledgment that the governing documents adopted on March 27, 2021, are the operative Constitution and Bylaws by August 31, 2022, or the LNC may need to consider other options in order to protect our branding and preserve the rights of aggrieved members of the LPNM. If an impediment to sending such an official acknowledgment by that date exists, please let us know what that impediment is and by what date this will be done.

Very truly yours,

Angela McArdle, Chair

Exhibit B

The Wayback Machine - <https://web.archive.org/web/20220826170608/https://lpofnm.us/the-libertarian...>

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August 26, 2022 6:26 am No Comments

The Libertarian Party of New Mexico (LPNM) Announces Its Independence from the LNC



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The Libertarian Party of New Mexico recently responded to a letter from the LNC disputing the validity of our Constitutional Convention held in July. The LPNM responded to their letter asserting our legal associational rights as an independent, autonomous private organization. You can read our [response to the letter from LNC here](#).

On August 25, The Libertarian Party of New Mexico Chair sent a letter back to LNC Chair, Angela McArdle informing her that the LPNM has removed the National Libertarian Party from the list of national organizations that LPNM affiliates with.

See our letter to the LNC below.



Libertarian Party of New Mexico

8100 Wyoming Blvd NE Ste M4, #341, Albuquerque NM 87113

August 25, 2022

To the Libertarian National Committee
c / o Angela McArdle, Chair

To the Libertarian National Committee,

Given the repeated refusal of the LNC to cease violating Article V, section 5 of the Libertarian Party Bylaws, the Libertarian Party of New Mexico has removed the National Libertarian Party from the list of national organizations that LPNM affiliates with. This action is effective upon delivery of this letter to the representatives of the Libertarian National Committee. In Liberty,

For the Central Committee of the Libertarian Party of New Mexico

/s/ Chris Luchini
Chris Luchini



Libertarian Party of New Mexico

8100 Wyoming Blvd NE Ste M4, #341, Albuquerque NM 87113

August 25, 2022

To the Libertarian National Committee
c / o Angela McArdle, Chair

This letter serves to inform you that the Libertarian Party of New Mexico (LPNM) has terminated our affiliation with the Libertarian National Committee, Inc. (LNC) and all of its subsidiary bodies, effective immediately.

LPNM continues to operate as a recognized major party in the state of New Mexico. LPNM will no longer be participating in any LNC programs or procedures, including the election of Libertarian National Committee members, sending delegates to the LNC's national convention, and participating in the nomination of the LNC's candidates for President and Vice President, including placing those candidates on the ballot in New Mexico as LPNM nominees under LPNM's ballot status.

To make the point perfectly clear: LPNM is no longer an affiliate of the LNC, just like we are not affiliated with the Republican, Democratic, Green, or any other party's national committee. LPNM and the LNC are no longer, in any sense, part of the same political party. All connections between us whatsoever are now totally and completely severed.

For now, LPNM is a New Mexico political party without any national party affiliation, in the long and vibrant American tradition of alternatives to the duopoly organized within a single state.

In severing our affiliation with you, LPNM is asserting our rights to freedom of speech, association, and assembly, as protected by the First Amendment to the United States Constitution, the rulings of the Supreme Court regarding political parties, the laws and Constitution of New Mexico, and most importantly, the fundamental principles of freedom we defend as Libertarians.

We regret that it has come to this, but you have left us no choice. This outcome is entirely the result of the unprovoked, corrupt, and illegitimate attack on LPNM's autonomy undertaken by the LNC in recent weeks, and the broader pattern of intolerable misconduct emanating from the LNC. In particular:

You have violated, repeatedly and deliberately, the Bylaws of the national Libertarian Party, and refuse to acknowledge any limits on your claimed powers over us.

You have attempted, without any just cause or legitimate authority and in violation of an explicit provision of your own Bylaws, to abrogate the autonomy of our state party.

You have conspired, with a faction inimical to the principles of libertarianism, to impose upon us officers and governing documents foreign to our rules, unchosen by our members, and unacknowledged by the laws of our state.

You have adopted messaging and communications hostile to the principles for which the Libertarian Party was founded, serving no purpose other than to antagonize and embarrass.

You have conducted the business of the National Party in a manner that is unprofessional, incompetent, and unworthy of support.

You have threatened us with false accusations, and attempted to imperil our legal status and ballot access under the laws of New Mexico by repeating these false accusations to the state government, attempting to enlist the state's assistance in your corrupt scheme to violate our rights.

You have demonstrated a manifest hostility and unwillingness to serve all Libertarians, including openly making threats to withhold support from any Libertarian candidate who is critical of your faction, and disparaging other principled Libertarian candidates across the country.

You have denied, by word and deed, that LPNM is a voluntary organization which exists independent of its affiliation with the National Party, instead adopting the position that LPNM exists solely at your whim and subject to your complete control, regardless of the wishes of our members and the rules we have freely adopted to govern our own affairs.

You have conducted yourselves, both individually and collectively, in a manner wholly unfit to represent any organization with serious purposes and goals, and in so doing you demean and devalue the efforts and reputations of all Libertarians.

You have destroyed the system of free and fair internal elections for your own positions in the National Party, by refusing to seat national convention delegates from states hostile to your faction, thus calling into question the legitimacy of your own most recent convention, and have given every indication that you will repeat such offenses in the future, all for the purpose of illegitimately entrenching yourselves in perpetuity.

You have, by your malice and incompetence, made yourselves into such an unattractive employer that the accumulated talents of the Party are unwilling to serve in critical staff roles for the National Party, or for any state party which is affiliated with you.

You have rendered the National Party's Judicial Committee a useless and ineffectual check on your violations and offenses, by stuffing it with members whose sole criterion for being chosen was their unwavering loyalty to the same faction which you serve over and above any interests of the Party as a whole.