

**JUDICIAL COMMITTEE APPEAL
TO VOID THE ADOPTION OF THE SPECIAL INVESTIGATORY
COMMITTEE REPORT
AND ALL ACTIONS TAKEN THEREUPON BY THE LIBERTARIAN
NATIONAL COMMITTEE
AT ITS JUNE 9, 2025 SPECIAL MEETING**

Filed by:

Hector Roos, sustaining member

On behalf of Petitioners

Date: September 30, 2025

Reply to LNC Respondent Brief

In re: Roos et al. v. LNC (2025 JC Appeal)

Petitioner respectfully replies as follows:

Emotional grievances are no substitute for moral principles. This is why we have principles in the first place and why the Respondent claiming to not be bound to them is folly.

The Respondent avoids responding to the many factual deficiencies identified in the appeal. Instead, the Respondent deflects that the JC should provide them a “reasonable standard for determining intent” in order to properly defend itself [LNC Response, Page 6]. While the LNC actions do resemble the often-lampooned authoritative declaration: “*We investigated ourselves and found no wrong-doing*”, intent is not a requirement to determine a violation of the Statement of Principles (SoP).

The important question in this appeal is not whether previous notice requirements protected absentees [LNC Response, Page 5] but whether LNC actions here violated bylaw requirements that protect the “basic right of an individual member” (RONR 12th ed. 23:6, 25:7, 25:10–11).

I. The LNC’s Position on Ethics Is Untenable

The Respondent shockingly asserts that it is “not bound by the Statement of Principles” (SoP) and minimizes the SoP referring to it as “a philosophical foundation and not a self-executing disciplinary code” [LNC Response, Page 6]. This position amounts to claiming that the governing body of the Libertarian Party has **no ethical constraints whatsoever**.

However, the Respondent has no problem with Robert’s Rules of Order (RONR) incorporated by the Bylaws that constrain the LNC and this JC. RONR enforces long-recognized principles of “common law” regarding duty, due process, and fairness. RONR 12th ed. *Introduction; Duties of Members* 32:1, 32:3-7; *Fairness* 12:81, 12:93, 16:15.7 FN14, 37:16, 39:4, 41:46, 45:46, 45:62, 47:19, 57:14, 63:5, 63:7-40. The SoP, like RONR, provides ethical constraints that procedural rules enforce. This JC is the mechanism provided in the procedural rules to constrain the LNC when it violates these ethical constraints *and refuses to correct them*.

The LNC itself accused Angela McArdle of violating her fiduciary duty. It cannot simultaneously admit fiduciary duties exist while disclaiming any binding ethical standards for itself. This contradiction alone shows that the LNC's position is untenable.

II. The Statement of Principles Does Bind the LNC

Article 3 of the Bylaws expressly affirms the Statement of Principles as the enduring foundation “by which [the Party] shall be sustained.” It is not credible for affiliates to be prohibited from acting contrary to the SoP while the national governing committee is free to ignore it [Bylaws Articles 5.2 and 5.4 (“Affiliate party status shall be granted only to those organizations which adopt the Statement of Principles...” and “No affiliate party shall take any action inconsistent with the Statement of Principles...”). It is not “absurd” [LNC Response, Page 6] to hold the LNC to the same minimum standard the Party demands of its affiliates.

The principles of interpretation also support this reading: “If the bylaws authorize certain things specifically, other things of the same class are thereby prohibited. There is a presumption that nothing has been placed in the bylaws without some reason for it.” RONR 12th ed. 56:68.4.

The Bylaws do not incorporate the SoP to have no practical effect on the society. If the affiliates are prohibited from actions that depart from the SoP, then the LNC is also prohibited as being part of the “same class”, as in, the Libertarian Party. Bylaws Articles 5.1-4.

The legislative intent of the founding convention delegates is confirmed by the first-hand account by Oklahoma's D Frank Robinson who was part of the drafting and passage of the Statement of Principles (SoP). [Exhibit 19-Memoir 2017 D Frank Robinson on the Statement of Principles, Page 1]. According to Mr. Robinson, the SoP was devised to create a “barricade to personality cults” that thrive on “ideological murkiness”. He firmly believes that the source of “factionalization and hair-splitting acrimony also [spring] from ambiguity and transient charismatics in an organization.” At the Libertarian Party's founding, the SoP was approved as an explicit “Article of Faith” serving as an “anchor and the lifeline” to the organization. The SoP is a guide to the development of the party platform as the Respondent suggests [LNC Response, Page 5] and party actions without differentiating between the national Libertarian Party and its affiliates. Bylaws Article 7.12 provides that an LNC “decision” is reviewable by the JC on whether it “contravenes specified sections of the bylaws”, including the SoP incorporated through Bylaws Article 3.

If any lesson can be learned from the runaway growth of the federal government, it is that constitutional constraints are not “self-executing”. Voters have to act to elect or create better safeguards to protect liberty. Similarly, the Bylaws are not “self-executing” code and must be executed by members to trigger a JC appeal as in this case. The SoP was incorporated into the Bylaws as Mr. Robinson concluded to avoid repeating the mistakes of “US Constitutional history.”

III. The Respondent Fails to Address SIC Report Errors About Freedom Calls

The SIC report includes an exaggerated claim of *near zero* dollars raised through Freedom Calls

Fundraising by Freedom Calls (FC) is measurably higher than described by Mr. Malagon in the SIC report, when compared to monthly financial reports and Federal Elections Commission filings. FC also operated at a substantially lower cost compared to staff salaries. By comparison, the SIC report incorporated Mr. Malagon's exaggerated *near zero* dollar estimate of revenue generated claiming it "raised approximately \$2,468.57 over the course of 366 days" [Exhibit 4-Special Investigatory Committee Report, Page 41].

According to the monthly LNC financial statements, the FC was generating revenue to the Fundraising Membership Program which tracked results well above the **meager amount** Mr. Malagon claimed in the SIC report. Revenue clearly dropped after the FC contract was terminated. The average monthly revenue for the Fundraising Membership Program was reportedly about \$80,000. [Exhibit 9-The LNC's SIC Report - Deregulation Corner, Table 1, Page 10]. As explained by Ms. McArdle, during this same time period when the FC was making calls, "No other LNC members made high volumes of calls to donors, or consistent donor calls except for me." [Exhibit 12-Angela PR Fact Sheet, Page 3].

Ms. McArdle describes the success of the FC describing "Revenue brought in by FC was at minimum comparable to revenue brought in by the two previous Fundraising Directors (yes, that's right. The contracted callers brought in revenue comparable to director level employees)" [Exhibit 12-Angela PR Fact Sheet, Page 3].

This revenue was received by the LNC while the FC was the only active program in place. However, the SIC report made no attempt to explain the other sources of revenue to justify its conclusion that it was not coming from the FC.

Respondent Contradicts SIC Report's Claims about Freedom Calls About Industry Standard

The appeal suggests that Freedom Calls' program costs were comparable to professional call centers during the presidential election year by comparing two quotes presented [Roos Appeal, Page 10]. The Respondent agrees that this "alternate explanation [] appears to be plausible, if unverifiable" [LNC Response, Page 9]. The Respondent does not explain why such an alternative or others were not considered by the SIC.

The Respondent claims that these alternative explanations of cost "doesn't mean that Freedom Calls didn't perform at industry standards, merely that there is no evidence that it did" [LNC Response, Page 9]. However, the SIC report concluded that the "LNC did not receive fair value from the Freedom Calls LLC transactions" [Exhibit 4-Special Investigatory Committee Report, Pages 9, 37, FN 8, 41].

LNC members knew or should have known about Freedom Calls

The Respondent failed to address claims that LNC members knew about the Freedom Calls arrangement and implicitly approved its activities [Roos Appeal, Pages 23-24]. The SIC report also evades this question [Roos Appeal, Page 20]. However, the Respondent knew that it was certain that LNC members discussed this amongst themselves and staff; transactions were recorded for inspection and published in Federal Elections Commission filings [Exhibit 9-The LNC's SIC Report - Deregulation Corner, Page 3]; and the LNC approved the 2025 budget containing the FC funding request [Exhibit 4-Special Investigatory Committee Report, Pages 9, 34-35].

The SIC report is clear that Mr. Padgett was a volunteer liaison [Exhibit 4-Special Investigatory Committee Report, Pages 3, 9, 35] and the Executive Director Hannah Kennedy discussed Freedom Calls with “McArdle or Padgett act[ing] as intermediaries” [Exhibit 4-Special Investigatory Committee Report, Page 15]. Ms. Kennedy had been the person to approve ten out of the fourteen Freedom Calls invoices [Exhibit 4-Special Investigatory Committee Report, Pages 2, 9, 37, FN 9]. Ms. Kennedy was hired as executive director on June 21, 2024 [Exhibit 4-Special Investigatory Committee Report, Pages 5, 31, FN 9]. Fifteen payments to Freedom Calls were disclosed publicly to the Federal Elections Commission with the first payment made on February 9, 2024.¹

IV. Two Distinct Forms of Misrepresentation

The Respondent glosses over the two separate misrepresentation claims at issue:

1. **Lack of Independence:** The SIC portrayed itself as independent while relying on LNC insiders with conflicts of interest [Roos Appeal, Pages 16-18].
 - a. **Definition of Independent.** The LNC response redefines what it meant as “independent” from the SIC report stating “no one was paid to be on the SIC and no one stood to gain anything of material value by being on the SIC.” [LNC Response, Page 8]. This is contradicted by the standard that the SIC report uses [Roos Appeal, Pages 16-17]. The burden is on the Respondent to demonstrate how the SIC members were independent. No serious attempt was made.
 - b. **Definition of Bias.** The LNC response redefines “bias” by shifting the blame to Ms. McArdle herself stating “As for bias [], [] both Ms. McArdle and Austin Padgett were solicited for interviews but either declined or ignored such requests” [LNC Response, Page 8]. The SIC report’s standard of bias is when a particularized issue would “reasonably be expected to impair the objectivity of an

¹ Search Libertarian National Committee Disbursements for “Freedom Calls”. Federal Elections Commission. https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00255695&recipient_name=freedom+calls.

individual's judgement" [Roos Appeal, Page 17].

- c. **Jake Porter's Report Adopted into the SIC.** The LNC response about their reliance on Jake Porter's report [LNC Response, Pages 8-9], presents the question: *What work did the SIC perform to reach the same conclusion Mr. Porter reported on?* The SIC report does not specify when they held meetings and what happened at these meetings. For the SIC report to claim that it was "independent" it must at least meet its own standard that does not rely solely on the work of a third-party [Roos Appeal, Pages 16-17].
 - d. **The Call Center Audit.** The LNC response appeals to the authority of Adrian Malagon [LNC Response, Page 9]. Mr. Malagon was neither a member of the SIC or an "industry professional that makes a living doing [this] type of call center work" [LNC Response, Page 9-10]. This claim about Mr. Malagon's expertise was not discussed in the SIC report and is not factual because Mr. Malagon's experience does not include the kind of work "performed by Freedom Calls", [LNC Response, Page 10] which are political marketing calls. See Adrian Malagon's LinkedIn profile: <https://www.linkedin.com/in/adrianfmalagon/>. Even if the claim that Mr. Malagon has this expertise, he is certainly not "independent" in a manner comparable to the accounting experts hired by the Audit Committee for their report [LNC Response, Pages 8-9] or as defined in the SIC report [Roos Appeal, Pages 16-17].
 - e. **Ms. Harlos and Ms. Hays Participated.** The Respondent admitted "Ms. Hays and Ms. Harlos were involved in the wording of the resolutions introduced at the June 9 meeting, but not the original wording in the SIC report itself" [LNC Response, Page 7]. LNC members did not know that these resolutions were drafted by non-SIC members. These resolutions were voided because they were drafted in such a way that departed from the text of the SIC report's recommendations. More importantly, although the Respondent claims that "the document was created on June 8, 2025, at 2:48 PM CDT" and "the exchange in the margin of the minutes had to have taken place after the release of the SIC report, but before the June 9 meeting" [*Id.*]. Yet, the exchange was copied from a separate shared document which means there is no timestamp available on the comments themselves to support the Respondent's claim. Because this "chain of custody" is incomplete with regards to the SIC report and its resolutions, there is no basis to support that only SIC members participated in the preparation of the SIC report and its appurtenant resolutions. We also do not have a record of SIC meetings, actions, or votes in the SIC report or elsewhere.
2. **Misrepresentation of Facts:** The SIC report presented false or misleading claims. The Respondent does not substantively provide an answer to these claims.
 - a. **Same Data, Two Different Conclusions.** It alleged widespread fraudulent transactions while an independent CPA audit found LNC finances under Angela McArdle to be proper, with expenses "allocated on a reasonable basis consistently

applied” [Roos Appeal, Pages 8-9]. The same information contained in the CPA audit was also available to the SIC. Despite this, the Respondent continues to assert that “LNC funds were paid to Freedom Calls without proper authorization” [LNC Response, Page 10]. This contradicts its own paid, independent CPA audit.

- b. **No Alternate Conclusions Considered.** The Respondent claims that they did not have to determine any alternatives to their conclusions because “no exculpatory evidence was provided” [LNC Response, Page 8]. As part of *showing your work*, an investigation should consider alternatives to justify its conclusions. Instead, there was only one narrative provided. Neither the SIC report or the LNC adopted any alternative conclusion [Roos Appeal, Page 11].
- c. **No LNC Response to Acknowledge or Assess Ms. McArdle’s Overall Fundraising Role.** The LNC response ignores the claim that the SIC report fails to consider Ms. McArdle’s significant role in LNC fundraising efforts [Roos Appeal, Pages 18-19]. A fair analysis of her tenure should balance any perceived shortcomings with her demonstrated fundraising contributions and strategic leadership. The SIC report does not address intent in fundraising context (purpose of the Freedom Calls): *Why would someone raising millions have to defraud the party of a paltry sum in comparison?*
- d. **No LNC Response to How Ms. McArdle’s Actions Were Not Authorized.** The SIC report attempts to paint a picture that LNC members did not know anything about Freedom Calls until Jake Porter’s report was published in January 21, 2025 [Exhibit 4-Special Investigatory Committee Report, Page 15 (“The LNC Board was blindsided by this revelation and took multiple actions over the following two weeks in furtherance of their fiduciary duty to the organization”)]. LNC members knew or should have known about Freedom Calls because its activities went on for a year. They also approved a budget for Freedom Calls for another year. The LNC regularly disclosed its finances at the request of LNC members, in monthly reports, and in public filings with the Federal Elections Commission. [Roos Appeal, Pages 23-24]. It would be impossible for the LNC to support the allegations of theft or illegal actions if the board had known and consented to the Freedom Calls arrangement. It was the practice of the board to allow Ms. McArdle significant authority such as when she appoint herself as Executive Director. The LNC allowing her to act in regards to Freedom Calls demonstrates an alternate to the SIC report conclusions [Roos Appeal, Pages 26-27].
- e. **LNC Legal Strategy in the SIC Report DOES Contradict the Respondent.** The Respondent states the appeal “erroneously claims that the SIC Report established that the LNC legal strategy was to join the Vest lawsuit” [LNC Response, Page 7]. The appeal makes no such claim. Instead, the appeal merely points out the admitted connection between the SIC report and the Vest lawsuit in their response to the *Jacobs* appeal [Roos Appeal, Pages 7-8; Exhibit 7-LNC Respondent Brief *Jacobs v LNC*, Page 7]. The Respondent fails to respond how Mr. Nekhaila, as chair of the LNC, admitted to private negotiations with Mr. Sarwark. The emails document that Mr. Nekhaila intended to settle the *Vest*

lawsuit to accomplish their common goals, which include the “denial of any future position” on the LNC to Angela McArdle [Roos Appeal, Page 8]. These goals are consistent with those of the LNC adopted through the SIC report [Exhibit 4-Special Investigatory Committee Report (Paragraph 6), Page 94]. The involvement of Mr. Sarwark in the development of the legal strategy in SIC report potentially undermines the SIC claim of independence.

- f. **The Respondent is in Error When Referring to Jake Porter Claims.** Jake Porter or the SIC did not verify, let alone “clearly show[.]”, that Austin Padgett was the “sole proprietor” of Freedom Calls [LNC Response, Page 9]. However, documents supporting this speculative claim [Exhibit 4-Special Investigatory Committee Report, Pages 8-9, 26-29, 32, 35] are not included in the SIC report [Roos Appeal, Page 23]. Instead, the SIC report relies on an “unlikely” alternative that did not happen [Exhibit 4-Special Investigatory Committee Report, Page 28]. Additionally, the claim that there was no written contract with Freedom Calls [LNC Response, Pages 8-9] is contradicted by a written statement of work that was executed consistently throughout the year of its performance [Roos Appeal, Page 23].

V. The Respondent Fails to Address Previous Notice Violations

The Respondent duplicates his response from the *Jacobs v LNC* arguing that the SIC resolutions met the notice requirements [LNC Response, Page 4; compare with Exhibit 7-LNC respondent brief *Jacobs vs LNC* dated 2025-08-08, Pages 4-5]. However, **the LNC already overruled these claims** when Mr. Nekhaila voided the SIC resolutions for not satisfying these previous notice requirements [Roos Appeal, Page 6]. Mr. Nekhaila held as well-taken Mr. Bohler’s point of order which stated:

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.

These actions took place several weeks ago and were the reason for the agreed dismissal of the *Jacobs v LNC* appeal. For the same reason Mr. Nekhaila voided those SIC resolutions, the JC can void the motion for adoption of the SIC report since it was also an original main motion [Roos Appeal, Page 22].

Finally, although the Respondent uses this to bolster their argument for compliance [LNC Response, Page 5], there is good faith disagreement with Mr. Jacobs’ belief that previous notice was met when the SIC written report was entered into the May 17, 2025 LNC meeting minutes (read the text of this report below). This petitioner can demonstrate that this “hinting” of a future

motion does not satisfy Policy Manual Rule 1.02.1 which requires “announcing this intention at the previous session.” The “previous session” requirement was not met because it is this party’s tradition to consider the LNC Business List as a new session between regularly scheduled monthly meetings [Roos Appeal, Page 21-22]. The LNC’s Business List also meets the “Duck Test” logic for the definition of a new session (see below). As a consequence, to satisfy previous notice the motion to adopt the SIC report would have needed to be considered in an e-mail ballot not a later session. The Respondent is silent on this concern.

The SIC’s written report dated May 17, 2025 in the meeting minutes reads [Exhibit 20-LNC-Minutes 2025-05-17-18 (Continued 2025-06-01), Pages 14, 171]:

More than fifty pages of report materials have been submitted to legal counsel for review. Recent member inquiries uncovered additional areas that require investigation, delaying the report’s consolidation; to stay on schedule, no further inquiries will be accepted at this time. A formal request for information was sent to the former Chair’s email of record, but the Special Investigatory Committee has not yet received a response.

Although we had hoped to finalize the report by now, emerging lines of inquiry have extended our timeline. The report will be completed once all current matters have been fully examined and counsel has concluded its review. Counsel has also advised that we postpone the report’s release until the pending legal action is resolved. The committee remains committed to releasing the report as promptly as possible. Please be advised that a Special Meeting will be convened to facilitate its formal release.

At that time of this written report to May 17, 2025 / June 1, 2025 meeting minutes, there was no SIC report available yet. Therefore, LNC members could not expect an SIC report to be sent to them or that they would be asked to consider a motion to adopt it. In this case, the SIC report significantly departed from the instructions by moving recommendations making its adoption an original main motion. RONR 12ed. 10:52. As a result of being an original main motion, the motion to adopt the SIC report would have required previous notice under Policy Manual Rule 1.02.1 [Roos Appeal, Page 22].

Bylaws Article 13 titled “Electronic Mail Ballots” reads (emphasis mine):

Boards and committees may transact business by electronic mail. The Chair or Secretary shall send out electronic mail ballots on any question submitted by the Chair or co-sponsored by at least 1/5 of the members of the board or committee. The period for voting on a question shall remain open for seven days, unless all members have cast votes, or have stated an intention to abstain or be absent during the voting period, by electronic mail to the entire board or committee. Votes from alternates will be counted, in accordance with previously defined ranked order, in the absence of the corresponding committee member(s). The outcome of each motion shall be announced promptly and recorded in the minutes of the next meeting. The number of votes required for passage of any motion shall be the same as that required during a meeting. Motions dispensed through electronic mail ballots satisfy the requirement of giving previous notice.

Duck Test: Is the LNC’s Business List and E-Mail Ballot a Separate Session?


Feature	Typical Meeting Session	Libertarian Party Email Ballot	Duck Test Verdict
Physical/Virtual Location	In-person or live virtual meeting	Asynchronous; no live interaction, but allowed per Bylaws Article 13	<input checked="" type="checkbox"/> Looks like a meeting
Quorum Requirement	Quorum required to conduct business	Quorum still applies under email ballot rules per Bylaws Article 13 (“submitted by the Chair or co-sponsored by least 1/5 of the members of the board”)	<input checked="" type="checkbox"/> Functions like a meeting
Decision-Making (Voting)	Real-time votes after motions and debate	Formal vote via email over a set period	<input checked="" type="checkbox"/> Functions like a meeting
Debate and Discussion	Live discussion and amendment process	No live debate; asynchronous discussion does take place on email list	 Partially resembles a meeting
Minutes and Documentation	Official minutes taken; detailed record of proceedings	Voting results documented; recorded in traditional minutes later	<input checked="" type="checkbox"/> Functions like a meeting
Time Frame for Voting	Voting happens during the meeting	Voting happens over days, not in real-time	<input checked="" type="checkbox"/> Doesn't look like a traditional meeting
Formality & Legitimacy	Fully recognized formal session	Fully legitimate under Party bylaws as an electronic method	<input checked="" type="checkbox"/> Quacks like a meeting (bylaw-backed legitimacy)

Table. Duck Test for LNC’s Business List and E-Mail Ballot as a Separate Session

E-mail ballots are not recommended by RONR because it “does not constitute a deliberative assembly” since “aural communication is essential to the deliberative character of the meeting.” RONR 9:34. However, the use of e-mail ballots can result in “many situations unprecedented in parliamentary law will arise, and many of its rules and customs will not be applicable.” RONR 1:1 FN 1. The LNC maintains a Business List as an around-the-clock session to resolve frequently moved e-mail ballots. **This regular practice of the LNC deliberating by e-mail on the LNC Business List or “transacting business by electronic mail” (Bylaws Article 13) does not circumvent the protections of deliberative assembly provided in RONR or the Bylaws.**

VI. Contradictions the Respondent Fails to Address

This appeal is about contradictions. The LNC's silence on these contradictions mentioned in this appeal is telling:

- **Audit vs. SIC Report:** The independent financial audit found no mismanagement, contradicting the SIC's allegations of fraud. The respondent brief does not explain this contradiction. [Roos Appeal, Pages 8-9].
- **Ban for Life:** The SIC report floated the idea of barring Ms. McArdle for life, yet LNC counsel admitted in open session that the LNC has no such authority. *Why was such a penalty advanced at all?* [Roos Appeal, Pages 7-8].
- **Secret Communications:** Emails between Chair Steven Nekhaila and former Chair Nicholas Sarwark confirm the goal of barring Ms. McArdle from serving on the LNC long before the SIC report was adopted. The involvement of Mr. Sarwark in the development of the legal strategy in SIC report potentially undermines the SIC claim of independence. The Respondent does not discuss these communications. [Roos Appeal, Pages 7-8].
- **The LNC Authorized Freedom Calls Contract and Received Service:** There are two key allegations in the SIC report to support criminal complaints or a lawsuit against Ms. McArdle: 1) Ms. McArdle received unauthorized compensation from the transaction; and 2) No fair services were provided [Roos Appeal, Page 12, FN 30]. However, indications in the SIC report were that Freedom Calls which operated for a year was operating with the consent of the board and provided a service [Roos Appeal, Page 20]. The continued approval of the LNC for this contract further contradicts the after-the-fact claim that the contract should have been more detailed or follow the policy manual requirement [LNC Response, Page 8-9].

These unaddressed contradictions strike at the credibility of the SIC process and the validity of the LNC's resolutions. The LNC action of adopting the SIC report with its flawed findings as fact is a clear example of misrepresentation.

VII. Conclusion

The LNC cannot disclaim ethical responsibility while simultaneously invoking fiduciary standards against others. It cannot claim independence where conflicts of interest are obvious. And it cannot reconcile the contradictions between its SIC report, its attorneys' admissions, its emails, and the independent audit.

For these reasons, Petitioners respectfully request that the Judicial Committee void the adoption of the SIC report, its appurtenant resolutions and other resolutions passed by the LNC based on the conclusions of the SIC report.