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January 5, 2026

**VIA FIRST CLASS MAIL AND EMAIL CORRESPONDENCE TO steven.nekhaila@lp.org
AND chair@lp.org**

Steven Nekhaila
Chair
Libertarian National Committee
1321 Upland Drive, PMB 7311
Houston, TX 77043-9965

**RE: Libertarian National Committee (“LNC”) demand on Angela McArdle for
restitution of \$49,600.00 in funds paid by LNC to Freedom Calls, LLC**

Dear Mr. Nekhaila:

Please be advised that this law firm has been retained to represent Angela McArdle (“Ms. McArdle”) in all matters relating to Ms. McArdle’s former affiliation with the Libertarian National Committee (“LNC”) as the LNC Chair.

I am in receipt of your letter dated December 5, 2025 (the “Letter”), demanding restitution of \$49,600.00 in funds that Ms. McArdle allegedly fraudulently caused LNC to pay to Freedom Calls, LLC (“Freedom Calls”) while “actively concealing” that Freedom Calls was formed by Ms. McArdle’s domestic partner. I have reviewed the Letter, the June 9, 2025 LNC Special Investigatory Committee Report (the “Report”) referenced in the Letter, as well as additional documents provided by Ms. McArdle, including correspondence between Meredith Hays (“Ms. Hays”) and various LNC board members relating to the Report and the allegations against Ms. McArdle. *See* Correspondence, attached hereto as **Attachment A**. I find absolutely no basis for LNC to demand restitution of \$49,600.00 in funds that Ms. McArdle allegedly caused LNC to pay Freedom Calls.

Specifically, neither the Letter, nor the Report dispute the fact that Freedom Calls provided services to LNC for which it was paid. The Report contains evidence that Freedom Calls actually performed legitimate call-center and outreach services for LNC, stating that

Freedom Calls made at least 13,738 fundraising calls over the course of 366 days. *See* Report at p. 9. The Report contains no evidence that suggests embezzlement, theft, or unlawful diversion of funds, nor any evidence that Ms. McArdle received personal compensation or profit from the Freedom Calls contract. Instead, the restitution demand appears to be based on the Report's highly subjective, unilateral finding that LNC "did not obtain fair market value for the funds it paid to Freedom Calls."

At the outset, it appears that the Report is of questionable validity. While the Report states that it was prepared by an Independent Special Investigative Committee, it appears that it was in fact ghost-written by Ms. Hays, who, at one time, claimed to be in a quasi attorney-client relationship with Ms. McArdle and, by ghost-writing the Report, has potentially violated ethics rules governing attorney conduct. *See* **Attachment A**.

Additionally, the legal conclusions in the Report are invalid and/or unsupported by the D.C. Code regulations or LNC policies cited in the Report. For instance, the Report concludes that LNC is entitled to restitution of funds paid to Freedom Calls because its contract with Freedom Calls is void or voidable under D.C. Code Ann. § 29-406.70. *See* Report at p. 8.

D.C. Code Ann. § 29-406.70 provides:

A contract or transaction between a nonprofit corporation and one or more of its members, directors, members of a designated body, or officers or between a nonprofit corporation and ***any other entity in which one or more of its directors, members of a designated body, or officers are directors or officers, hold a similar position, or have a financial interest***, shall not be void or voidable solely for that reason, or solely because the member, director, member of a designated body, or officer is present at or participates in the meeting of the board of directors that authorizes the contract or transaction, or solely because his or their votes are counted for that purpose.

D.C. Code Ann. § 29-406.70(a) (emphasis added).

It is undisputed that Ms. McArdle was not a "director[]" or officer[]" of, or "hold a similar position" in, Freedom Calls. And, the Report contains no factual findings whatsoever that Ms. McArdle had the requisite financial interest in Freedom Calls to void LNC's contract with Freedom Calls. Consequently, D.C. Code Ann. § 29-406.70 does not support LNC's demand for restitution.

Furthermore, while the Report identifies a number of LNC policies that the contract with Freedom Calls allegedly violated, none of the policies identified in the Report contain any provision(s) whatsoever requiring Ms. McArdle to personally reimburse LNC for funds paid by LNC to Freedom Calls.

The restitution demand has no merit and appears to be brought in an attempt to harass and/or intimidate Ms. McArdle. Should LNC choose to pursue meritless legal action against Ms. McArdle, I am prepared to defend Ms. McArdle in the court of law and I am certain that, given

the tenuous nature of the allegations against Ms. McArdle and the questionable validity of the Report, any case against Ms. McArdle is highly likely to be dismissed. Additionally, any legal action against Ms. McArdle will result in counterclaims against LNC for any and all causes of action available in law and equity, including but not limited to defamation and intentional infliction of emotional distress.

In the meantime, we are hereby instructing you to preserve any and all documents and electronically stored information (ESI), including but not limited to all internal correspondence, documents, emails, messages, and/or other records in any way related to LNC's restitution demand, the allegations against Ms. McArdle, and the Report. We expect all relevant documents and communications to be preserved, and specifically request that you preserve all ESI, including emails and messages, to and/or from Meredith Hays.

Very truly yours,

THE PELS LAW FIRM, L.L.C.

/s/ Jon D. Pels

Jon D. Pels, Esq.

JP/kn

cc (via email correspondence only)

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