

# APPEAL TO THE JUDICIAL COMMITTEE OF THE LIBERTARIAN PARTY

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

**PETITION FOR REVIEW AND REVERSAL, AND FOR INTERIM RELIEF**

*Filed pursuant to LP Bylaws Art. 5 §6 and Art. 8 §2(a), and JC Rules of Appellate  
Procedure §1.*

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*“If you proceed to condemn me by bare inferences, without  
an oath, without a subscription, without witnesses, upon a  
paper accusation, you try me by the Spanish inquisition.”*

*—Sir Walter Raleigh, 1603*

## **I. Petitioner**

Petitioner is the Libertarian Party of New Hampshire (“LPNH”), a New Hampshire Nonprofit Corporation and the state-level affiliate chartered by the Libertarian National Committee (“National Committee” or “LNC”) under Article 5 of the Libertarian Party Bylaws (the “Bylaws”).

This Petition is filed on behalf of LPNH and its Chair, Jeremy Kauffman, by and through Petitioner’s legal counsel, Ian B. Huyett, under LPNH Bylaws Art. VI pursuant to a unanimous vote of the LPNH Executive Committee. *Cf. Exhibit D, Exhibit F.*

## **II. Directly Affected Parties**

This matter concerns LPNH, its sub-affiliate organizations chartered under LPNH Bylaws Art. XI, all dues-paying members of LPNH domiciled in New Hampshire, the Libertarian National Committee, and the National Committee’s members of record party to the May 25, 2026 vote.

## **III. Subject-Matter Jurisdiction**

This Committee has jurisdiction over this appeal under Bylaws Art. 8 §2(a), listing “suspension of affiliate parties” as within the Committee’s jurisdiction. While Article 5 §6 itself uses the word “revoke” rather than “suspend,” Art. 8 §2(a) is referring to the same procedure.

Petitioner received formal Notice of Revocation from LNC Chair Evan McMahon on June 4, 2026, by email to [chair@lpth.org](mailto:chair@lpth.org) and by certified mail. This Petition is filed within the 30-day appeal window provided by Art. 5 §6, which runs through July 4, 2026.

## **IV. Ruling Requested**

Petitioner requests that the Judicial Committee:

1. Reverse the National Committee’s purported revocation or suspension and order reinstatement of LPNH as the recognized state-level affiliate, together with all relief incidental to making reinstatement effective; or
2. In the alternative, order the formation of a Dixon-style investigatory committee pursuant to the LNC’s June 2021 motion on the Jarvis matter and the Dixon Committee model; and, in either case,
3. Preserve the status quo pending decision, so that the relief sought is not made moot during the pendency of this appeal.

## **V. Statement of Facts**

### **a. Illegitimate presidential endorsements by the LPC and LPNH in 2024**

1. On July 2, 2024, the Libertarian Party of Colorado (“LPC”) formally voted to designate Robert F. Kennedy Jr. as its presidential candidate on Colorado’s general election ballot. Kennedy, at the time, was the leader and nominee of the We the People Party, an independent political party organized across numerous states to help promote ballot access for Kennedy’s campaign.

2. The LPC’s purported nomination of Kennedy was void under the Libertarian Party’s bylaws, which state that “No affiliate party shall endorse any candidate who is a member of another party for public office in any partisan election.” Art. 5 §4.
3. In the ensuing ballot dispute, Libertarian Party nominee Chase Oliver, rather than Kennedy, ultimately appeared on ballots in Colorado. Nonetheless, the LNC has never taken disciplinary action against the LPC—neither censure nor revocation. *Cf. Exhibit E.*
4. On November 4, 2024, former leaders of the Libertarian Party of New Hampshire (“LPNH”) held a meeting of the LPNH Executive Committee at which they wrongly and invalidly purported to endorse Donald Trump for President.
5. Minutes from that day’s LPNH Executive Committee meeting reflect that the motion to endorse Donald Trump was made by then-LPNH treasurer Zephan Wood and supported by committee members Wood, Reinita Susman, and Matthew Fletcher. *See Exhibit C.*
6. Vice Chair Nick Hubbard spoke in opposition to the motion and appropriately voted no; the motion carried 3-1.<sup>1</sup>

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<sup>1</sup> Jeremy Kauffman was appointed Secretary in absentia at the same meeting, but was not present, did not vote, and as an interim member would have been “not [to] have a vote on the Executive Committee” under LPNH Bylaws Art. VI §M.3 in any event.

**b. Subsequent leadership changes in the LPNH**

7. The actions of Wood, Susman, and Fletcher—none of whom retains any role in LPNH leadership today—were void *ab initio* and never represented the will of most dues-paying members of LPNH. See **Exhibit D**.
8. Many LPNH members, though far from being admirers of Libertarian Party nominee Chase Oliver, distrusted Donald Trump’s foreign policy promises and criticized prominent Libertarians like comedian Dave Smith who supported Trump.
9. At the March 8, 2025 convention of LPNH, with 103 credentialed delegates in attendance, only Nick Hubbard—who had opposed the attempt to endorse Trump—was reelected. Former LPNH Chair Ryan Bloodworth, who had presided over the November 4 vote but did not vote, was also not reelected to any position.
10. Instead, dues-paying members of LPNH largely elected leaders who opposed the attempt to endorse Trump. Ben Weir was elected Chair in a vote of 54-28, Nick Hubbard was reelected as Vice Chair, and Jeremy Kauffman, Patrick Binder, Josh Elbahrawy, and Bill Barger were also elected.
11. With the sole exception of Hubbard—a critic of the President who had voted against endorsing Trump—this was an entirely different set of LPNH leaders than those who voted for the Trump endorsement on November 4, 2024.
12. Wood, Susman, and Fletcher—the three officers who voted to endorse Trump—have never been elected to any LPNH office since.

13. LPNH underwent a second leadership transition at its March 14, 2026 convention, leading to the election of its current leadership team. On March 14, Jeremy Kauffman was, for the first time, elected Chair of the LPNH in a 73-40 vote.<sup>2</sup>
14. Josh Elbahrawy was elected Vice Chair and Daniel Koenig, Brandon Stevens, Bill Barger, and Nate Dwyer were elected to leadership positions. None of these officers ever supported endorsing Trump or had any role in the November 4, 2024 vote.<sup>3</sup>

**c. May, 2026 attempt to disaffiliate LPNH for purportedly endorsing Donald Trump**

15. The 2026 Regular Convention of the Libertarian Party was held in Grand Rapids, Michigan on May 21–25, 2026.

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<sup>2</sup> The Chair vote is evidence that, contrary to claims made at the convention by some LNC members, the LPNH includes significant internal debate and is not a monolith controlled unilaterally by Kauffman. Disaffiliating the entire LPNH is no more an appropriate way to settle political disagreements with Kauffman as an individual than it is a fair way to penalize the pre-Kauffman, Bloodworth-era LPNH leaders who wrongly endorsed President Trump.

<sup>3</sup> While Jeremy Kauffman is nominally the sole continuous officer through the relevant period, at the time of the Trump endorsement vote he was the non-voting interim Secretary appointed *in absentia* minutes earlier. It is a matter of public record that Kauffman—who is famously outspoken about his views on social media—never supported the Bloodworth Board’s vote to endorse Trump.

16. On Sunday, May 24, a motion was made to eject LPNH's Chair, Jeremy Kauffman, from the convention body. Following a division and standing count, the chair ruled the motion had not obtained the requisite two-thirds. The motion failed. *2026 Libertarian National Convention*, LP National, YouTube (May 24, 2026), [https://www.youtube.com/watch?v=gIWX2IkZ\\_So](https://www.youtube.com/watch?v=gIWX2IkZ_So) (last visited June 21, 2026), approx. 22:30–29:25.
17. During debate, a delegate objected that “these are disciplinary proceedings that have not been noticed and do not conform to our bylaws and our statements of principles.” *Id.* The North Carolina State Chair urged the body: “Not to kick out New Hampshire. Not to kick out Jeremy Kauffman.” *Id.*
18. On Monday, May 25, the convention adjourned. Less than thirty minutes later, the newly-elected LNC convened. *See generally id.*
19. Early in the meeting, LNC member Alfa Shaw moved to add to the agenda the formation of an investigatory committee on the potential disaffiliation of LPNH. The motion was rejected on voice vote. *Id.*, approx. 14:14–15:18.
20. The LNC took up a motion to disaffiliate LPNH and mandate that it cease and desist using its name and logo, reciting that LPNH “openly and publicly endorsed President Trump during the election” in violation of Art. 5 §4 and had “clearly and repeatedly undermined or espoused numerous anti-Libertarian positions on an [official] level.” *Id.*, approx. 43:15–44:03.

21. Another member added that it was “a particularly egregious and open betrayal to support President Trump during a partisan election.” *Id.*, approx. 44:00.

22. Alfa Shaw moved to amend the motion to require investigation first, saying “If we’re going to do something as large as disaffiliating one state, I would like to produce a report [enumerating specific violations].”

23. A member opposing Shaw’s amendment stated on the record:

I may not have a list of particulars—this happened in such and such a time, this [sic] ready to go, but we all know what’s been going on up there, big picture, for a long time. Disaffiliation is badly overdue... I will vote against this amendment. I will vote to disaffiliate the LPNH. It’s that simple.

*Id.*, approx. 49:47–50:00.

24. Another speaker argued that, on appeal, the National Committee “would have to show, we would have to prove cause to the JC.” *Id.*, approx. 50:46–50:58. He added: “I believe that we should pass the resolution to finally, finally bring New Hampshire to order by disaffiliating them immediately today and having a clean new LNC that can move forward.” *Id.*, approx. 51:27–51:40.

25. Another LNC member then made comments to the effect that “the endorsement [of Trump] in 2024” was appropriate cause to disaffiliate LPNH.

26. Shaw tried once again to introduce some investigative process, noting: “It may be prudent for this body to consider making a proper report in the event that some action were taken by the members of the state to engage this body [the

LNC] in some kind of a legal suit. If we document what we are doing and why... it would be easier.” *Id.*, approx. 52:00.

27. Austin Martin, Chair of the Hawaii Libertarian Party, spoke up to state that he “strongly supports Mr. Shaw’s amendment” because:

...due process consists of two elements: notice and an opportunity to respond. What you’re about to do will have a massive impact on state bodies, plural, and on the composition of this body, and it would properly be considered a disciplinary action for which we have given no notice and opportunity to respond. If challenged, it would be easily shown this was a snap decision made after the heat of the convention. There was a lot of very angry rhetoric.... *We’re the Libertarian Party*. We should not be driving out everyone that has dissent... That means an investigation. I have a feeling this will very likely be a suit: why do it sloppily? In my fiduciary capacity, I urge you all to pass this amendment to protect the LNC from the ridiculous amount of liability you’re [inaudible.]

*Id.*, approx. 53:00.

28. Despite Shaw and Martin’s arguments, the Shaw amendment was defeated in a voice vote. Apparently in response to Martin’s arguments, an opponent of the Shaw amendment then immediately moved to “limit each speech to no more than 30 seconds”—although the motion was apparently not taken up. *Id.*, approx. 55:00.

29. In a final remark in support of disaffiliation, a member pointed to “the endorsement of Mr. Trump” on “November 4, 2024. It [LPNH’s endorsement of

Trump] received 2.2 million views [on X]. I’m actually not going to say anything else.”

30. The primary motion—to disaffiliate LPNH—was then adopted by an announced tally of 15–2–1. *Id.* Although a roll call was taken, an official roll call has not been provided.
31. On June 4, 2026, approximately two weeks after the May 25 committee vote to disaffiliate LPNH, Evan McMahon, Chair of the LNC, sent a letter to LPNH Chair Jeremy Kauffman stating that LPNH is “hereby provided with notice” of disaffiliation under Article 5 §6 of the Bylaws. *See Exhibit A.*
32. Consistent with the discussion immediately preceding the National Committee vote, this letter recited the allegation in the Committee’s motion: “The bylaws are clear that the affiliate Parties shall not endorse the candidate of another Party. Despite this, the Libertarian Party of New Hampshire openly and publicly endorsed President Trump during the election.” *Id.*
33. No other specific allegations against LPNH were ever recited in the May 25 discussion, the text of the May 25 motion, or in the June 4 letter of disaffiliation.<sup>4</sup>

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<sup>4</sup> Although it was never referenced in the committee meeting, motion, or disaffiliation letter, and is therefore not at issue before this Committee, on September 12, 2025, LNC member Sam Bohler, with co-sponsors Dustin Nanna, Evan McMahon, Keith Thompson, introduced a motion to censure LPNH, noting that “the Libertarian Party of New Hampshire has published [a post] on social media depicting a Jewish person piloting a plane in

34. At no point before May 25, 2026 did the National Committee (a) provide LPNH advance notice that revocation was being considered, (b) identify with particularity the specific conduct alleged to constitute cause—not even the Trump endorsement—or (c) invite LPNH to respond.<sup>5</sup>

35. When the National Committee last faced a serious dispute concerning LPNH, it convened a three-member investigatory committee to develop the record, which issued a written report dated August 30, 2021 and articulated an institutional

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connection to the September 11 attacks.” The censure referenced an LPNH tweet showing a Pixar-style cartoon depicting a pilot wearing a Star of David with a caption reading “Did Israel do 9-11?”. This censure blithely ignored the context of this tweet: now-Chair Jeremy Kauffman—at the time an officer and prominent member of the LPNH—is Jewish, and has regularly and publicly satirized the idea that “Israel or Jews [are a] boogeyman behind every political outcome [antisemites] dislike.” Kauffman routinely criticizes “bitterness towards Jews” as a form of jealousy and has stated that, for example, “The evidence for some of the more extreme claims just isn’t there for me. And the people who end up obsessed with Israel seem disproportionately low IQ and schizo.” Kauffman’s posts frequently draw criticism on X in response to his rejection of antisemitism. The authors of the September 12, 2025 censure motion made no attempt to understand the meaning of the LPNH’s tweet.

Notably, the November 2024 Trump endorsement had at that time been a matter of public record for ten months. No new conduct by LPNH between September 19, 2025 and May 25, 2026 has been cited to support escalation from censure to disaffiliation.

<sup>5</sup> Only two JC seats were filled by delegate election at the May 2026 convention: those of Avens O’Brien and Ken Moellman. On or about June 2, 2026, the two elected members announced the appointment of five additional members under Art. 8 §1 (Patrick Dixon, Mary Gingell, Sam Goldstein, Chuck Moulton, Geoffrey Neale), bringing the Committee to a full seven members. LPNH does not challenge the individual qualifications of any of these five members to serve on this Committee and does not rely on an objection to the Committee’s composition in this appeal, but reserves its right to challenge the manner in which the present Judicial Committee was formed.

“model of investigating internal issues.” This model is more fully explained in the argument section below. *See* **Exhibit G**.

36. That investigation concluded that there had been “intentional interference in a state party by individual LNC actors,” including the then-LNC Chair, “using their LNC titles to influence an outcome of a convention in a state where they do not reside.”
37. The Shaw amendment rejected on May 25, 2026 proposed essentially the same procedure the National Committee chose to apply to LPNH five years earlier.

## **VI. Argument**

38. Petitioner presents three principal arguments against the validity of the purported disaffiliation. First, gesturing towards unenumerated reasons—*e.g.*, a generic claim that LPNH has espoused “anti-Libertarian positions”—cannot constitute disciplinary action “for cause.”
39. Second, the sole enumerated charge against LPNH—the November 2024 vote by some former LPNH leaders to endorse Donald Trump—does not constitute “cause” to disaffiliate the current LPNH. That endorsement never reflected the views of most LPNH members, none of the officers who voted for it holds any leadership role in LPNH today, and LPNH has clearly repudiated it.
40. Third, the manner in which the LNC purported to disaffiliate LPNH is contrary to the LNC’s 2021 resolution on affiliate discipline and to the Dixon Committee’s formal model of systematic “examination of the facts, evidence and

reasoned analysis.” This procedural failure can only be cured by this Committee’s ordering the formation of a Dixon-style investigatory committee to interview witnesses, examine evidence, and make findings and recommendations.

### **A. Unenumerated Reasons Cannot Constitute Disaffiliation “For Cause”**

41. Because no reasons other than the Trump endorsement were ever enumerated during the LNC vote or in the LNC’s written notice of disaffiliation, the Judicial Committee should restrict its analysis to whether the endorsement of Trump in 2024—by a group of individuals who no longer have any leadership role in LPNH—warrants the disaffiliation of LPNH in 2026. The vague recitation in the motion that LPNH “clearly and repeatedly undermined or espoused numerous anti-Libertarian positions on an [official] level” cannot itself constitute grounds for action “for cause.”

#### **1. Unenumerated Reasons Are not “Cause” Under the Party Bylaws**

42. The Bylaws repeatedly state that the LNC may revoke the status of an affiliate party “for cause.” *See* Art. 5 §6. “For cause” is a term of art and is distinct from “at will” termination or disaffiliation.

43. “Cause” requires, *inter alia*, that a disaffiliation motion or other sanction must identify with particularity what the cause is. An allegation of “anti-Libertarian

positions” is *per se* insufficient. Invoking a general impression rather than a list of particulars—*i.e.*, “I may not have a list of particulars... but we all know what's been going on up there.”—is the antithesis of “for cause.”

44. This textual argument is underscored by the Bylaws provisions governing this Committee. Article 5 §6 places “the burden of persuasion on the appellant” and allows parties to “submit evidence and argument.” If the LNC could effectively disenfranchise affiliates at will—without enumerated allegations supported by any factual record—there would be nothing for this Committee to review. The appeal would be structurally hollow and the relevant Bylaws provisions would lack content.
45. This outcome would contradict standard canons of legal interpretation and the internal methods of this Committee, which has always assumed that each phrase in the Bylaws was chosen for some purpose. The appearance of a meaningful appellate process in the Bylaws presumes and requires that the underlying action be founded on enumerated allegations and evidence.
46. The Bylaws also provide that “[t]he rules contained in the current edition of Robert’s Rules of Order, Newly Revised shall govern the Party.” Art. 16.

Robert’s Rules establish disciplinary norms directly applicable here. RONR (12th ed.) 63:7 states:

Most ordinary societies should never have to hold a formal trial, and their bylaws need not be encumbered with clauses on discipline. For the protection both of the society and of its members and officers, however, the basic steps which, in any organization, make up the elements of fair disciplinary process should be understood. Any special procedures established should be built essentially around them, and

the steps must be followed in the absence of such provisions. As set forth below, these 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 (12th ed.) 63:7. The LNC's disaffiliation of LPNH did not follow any of these basic elements of fair disciplinary process.

47. Even if the LNC's disaffiliation letter could be said to include "findings," there was no formal investigation, no notice to LPNH of specific charges before the vote, and no trial.
48. This Committee's own precedent has directly incorporated the concept of "for cause" contained within Robert's Rules. In *Phillies v. LNC*, this Committee held: "By providing that 'The National Committee may, for cause, suspend any officer . . . ' without defining 'cause,' the Bylaws implicitly invoke the aforementioned standards of behavior set forth in Robert's as the minimum to allege and prove have been breached to remove an officer." *Phillies v. LNC*, JC Decision (Dec. 3, 2024), at 5.
49. The "for cause" in Article 5 §6 standard entails the same basic requirements: investigation, specified charges, and notice to the accused. None of these things occurred in this case.

## **2. Unenumerated Reasons Are not “Cause” Under Applicable Law**

50. Courts often treat the constitution and bylaws of a voluntary association as a contract between the organization and its members. “The constitution and by-laws of an unincorporated association express the terms of a contract which define the privileges secured and the duties assumed by those who have become members.” *Polin v. Kaplan*, 257 N.Y. 277, 281 (1931) (Cardozo, J.).
51. While courts respect the autonomy of voluntary associations, courts may intervene “[i]f an expulsion has been decreed for acts not constituting violations of the constitution and by-laws, and not made expellable offenses thereby, either by terms expressed or implied.” *Id.* at 282. In such cases, “the expulsion is not within the power conferred by the contract.” *Id.*
52. 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.”).
53. For the reasons set forth above, any disaffiliation of LPNH based on vague, unenumerated allegations—that is, without specific charges, adequate notice of those charges, and a meaningful opportunity to respond—is a violation of the Party’s own Bylaws and Robert’s Rules *as well as* a breach of the contractual relationship between LPNH and the Libertarian Party.

## **B. Disaffiliating LPNH Over the 2024 Trump Endorsement Is Not Disaffiliation “For Cause”**

54. Because unenumerated accusations cannot support disaffiliation “for cause,” the November 2024 vote by some former LPNH officers to endorse Donald Trump remains the only potentially colorable basis for the LNC’s action. That charge also cannot constitute “cause.”
55. The unfortunate vote to endorse Trump was the action of a previous group of leaders who have had no role in LPNH governance for two full election cycles. *See supra* ¶¶ 9–13; **Exhibit D**.
56. The three officers who voted for the endorsement—Wood, Susman, and Fletcher—have never been elected to any LPNH office since. Jeremy Kauffman, who is now Chair and in whose name this Petition is filed, was appointed as a non-voting interim Secretary at the same meeting and was not present for the vote. *See Exhibit C*; *supra* nn.1–2.
57. Whether under Robert’s Rules, this Committee’s precedent in *Phillies*, or under applicable law, a “for cause” sanction necessarily entails that the prohibited conduct was performed by the person or entity being sanctioned—not a different set of individuals who no longer hold any office.
58. To the extent that the disaffiliation is meant to punish the individual officers who voted for the endorsement, it punishes the wrong people and is therefore not “for cause” as applied to the current LPNH.
59. On the other hand, to the extent disaffiliation is meant to corporately punish current LPNH, it is a misdirected act of collective blame. Most LPNH members

never supported the endorsement and reelected the sole officer who opposed it. The LPNH has formally repudiated the endorsement.

*See Exhibits B-1, B-2, D.*

60. LPNH has cured and remedied any violation of Art. 5 §4 by:

- At its March 2025 convention, not electing any officers who had voted for or even supported the Trump-endorsement motion;
- Reelecting Nick Hubbard—the most prominent opponent of the Trump endorsement vote within LPNH—as its Vice Chair in the same election; and
- Formally and directly repudiating the endorsement in the Executive Committee resolution accompanying this Petition. *See Exhibit D.*

61. Every contract, including the bylaws of associations, imposes upon each party a duty of good faith and fair dealing in its performance and its enforcement. *See Restatement (Second) of Contracts § 205; U.C.C. § 1-304.*

62. To corporately disenfranchise LPNH solely for the action of a previous group of leaders two years ago is contrary to fundamental fairness—especially when the LNC has taken no disciplinary action against LPC for its parallel violation of Art. 5 §4. *See Exhibit E.*

## C. The Manner of Disaffiliation Does Not Comport with the LNC's Own Precedent

### 1. The 2021 Dixon Committee Model

63. In 2021, an analogous internal dispute arose within LPNH involving then-LNC Chair Joe Bishop-Henchman. By a motion adopted in June 2021, the LNC formed an *ad hoc* investigative committee—subsequently chaired by current JC member Pat Dixon (the “Dixon Committee”)—to investigate those events. See **Exhibit G** (LP of NH Investigation Committee Report (Aug. 30, 2021)).
64. 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.” *Id.* at 8–9.
65. The resolution itself shaped the contours of this model. It ordered that the Dixon Committee “report back to the LNC for a debriefing of the findings, recommendations, and final thoughts upon the investigation being determined complete by the committee.” *Id.* at 9.
66. This motion effectively empowered the Dixon Committee to create a normative model governing the LNC’s intervention into the internal disputes of affiliates. It also created an expectation among Libertarian Party affiliates that the LNC would generally follow the Dixon Committee model to the extent it interceded in their internal disputes.

67. In other words, this “model of investigating internal matters” was always meant to include an investigation, enumerated findings, and specific recommendations to resolve any problems uncovered in the investigation.
68. The Dixon Committee fulfilled its charge by conducting a detailed, systematic investigation. Among other things:
- It “interview[ed] pertinent members” of both organizations, *id.* at 8;
  - It “review[ed] any pertinent party run or personal electronic communications of the parties involved,” *id.*;
  - It undertook “an examination of the facts, evidence and reasoned analysis,” *id.* at 10.
69. Specifically, Committee Chair Dixon prepared “an evidence folder,” “wrote a project charter and project plan,” and “created a timeline of events, list of questions to ask, and contact list.” *Id.* at 22. As part of this examination of evidence, the committee reviewed numerous specific documents and social media posts. *See id.* at 25–31.

## **2. The LNC's Failure to Follow the 2021 Jarvis Motion and Dixon Committee Model**

70. To comply with the expectation created by the LNC’s 2021 motion and the Dixon Committee model, the LNC should have established a committee that—at a minimum—interviewed witnesses, examined evidence, undertook reasoned analysis, and made findings and recommendations. The LNC did none of these things.

71. On the contrary, the LNC repeatedly dismissed, out of hand, the proposals of LNC members Shaw and Martin that there be elementary due process in the form of notice and an opportunity to respond.
72. As one member acknowledged, “I may not have a list of particulars—this happened in such and such a time... but we all know what’s been going on up there.” See supra ¶ 23.
73. Another member, after pointing to the fact that a post endorsing Trump had received millions of views on X, said simply: “I’m actually not going to say anything else.” See supra ¶ 29.
74. In other words, despite creating a detailed “model” for investigating internal affiliate matters five years ago, both by its own motion and by way of the Dixon Committee report, the LNC suddenly, without notice, and unilaterally repudiated the expectation of notice, investigation, and reasoned analysis on which state affiliates had previously relied.

### **3. Appropriate Alternative Relief: A Dixon Investigatory Committee**

75. The LNC’s failure underscores the wisdom of the Dixon Committee model. Had the LNC simply adhered to its 2021 model and conducted an investigation, it would have been evident that LPNH cannot be disaffiliated for cause.
76. A Dixon-type investigation would have conducted interviews and reviewed LPNH minutes and other documents. Any such investigation would have found

that, among other things, the 2024 endorsement of Trump did not have the support of most LPNH members and does not reflect the views of current LPNH leaders.

77. Instead, the LNC—without investigation or even meaningful deliberation—disaffiliated the entire LPNH, effectively disenfranchising the majority of LPNH members who never supported the Trump endorsement. By doing so, it collectively punished Libertarian Party sustaining members in New Hampshire for the actions of a previous set of individual leaders.
78. Accordingly, in the alternative to complete reversal, Petitioner requests that this Committee order the formation of an investigatory committee modeled on the Dixon Committee pursuant to the LNC’s June 2021 motion on the Jarvis matter. This committee would be charged with interviewing witnesses, examining evidence, undertaking reasoned analysis, and reporting enumerated findings and recommendations before any disaffiliation takes effect.

## **VII. Prayer for Relief**

WHEREFORE, Petitioner respectfully requests that the Judicial Committee:

1. Acknowledge receipt of this Petition and confirm the date of docketing in writing;
2. Preserve the status quo pending decision, so that the relief sought is not made moot during the pendency of this appeal;

3. Set this matter for hearing within the time prescribed by Art. 5 §6;
  4. 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
  5. 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
  6. Grant such further relief as this Committee deems just and proper.
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## **VIII. Exhibits**

- **A** — June 4, 2026 Notice of Revocation from LNC Chair Evan McMahon to LPNH Chair Jeremy Kauffman, reciting the official text of the May 25, 2026 motion as adopted and reporting the vote tally.
- **B** — LPNH annual convention minutes: B-1 March 8, 2025; B-2 March 14, 2026.
- **C** — November 4, 2024 LPNH EC meeting minutes.

- **D** — LPNH Executive Committee resolution repudiating the November 4, 2024 endorsement, reaffirming forward compliance with Art. 5 §4 and the Statement of Principles, and authorizing the filing of this Petition.
- **E** — Selective-enforcement comparator file; principal comparator: LPC’s July 2024 RFK nomination.
- **F** — Current LPNH Bylaws; NH Articles of Agreement (Filing No. 7116279); NH Certificate of Good Standing No. 0007116280.
- **G** — LP of NH Investigation Committee Report, Rev. 0 (Aug. 30, 2021) (“Dixon Committee Report”).

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Respectfully submitted this 2nd day of July, 2026,



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## **Certificate of Service**

I certify that on July 2, 2026 true copies of this Petition and all 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.

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