

EMERGENCY REQUEST

JUDICIAL COMMITTEE APPEAL TO DECLARE NULL AND VOID THE PURPORTED LPCO CONVENTION ON JUNE 28, 2025 AND ALL SUBSEQUENT ACTIONS RESULTING THEREFROM

The Board of Directors of the Libertarian Party of Colorado, hereinafter LPCO, voted unanimously at a regular LPCO Board meeting on July 14, 2025 to authorize petitioner, Hannah Goodman, in her capacity as Chair of the LPCO Board, to submit this appeal to the LPCO Judicial Committee to declare the purported LPCO State Convention held on June 28, 2025, in Holyoke, Colorado, and all actions, resolutions, committees, elections, and subsequent communications and notices arising therefrom, null and void for violations of the *LPCO Bylaws*. **This appeal is an emergency request to resolve this matter within the internal dispute resolution procedures of the party.**

1. JURISDICTION

The LPCO Judicial Committee has subject matter jurisdiction over challenges to resolutions made at Convention by Delegates, as provided in *LPCO Bylaws, Article IX, Section 4(a)(5)*. This appeal challenges the validity of purported resolutions passed at the purported June 28, 2025 convention, including the resolution creating the Emergency Board Oversight Committee (EBOC), any bylaws amendments adopted therein, and related actions, on the grounds that the convention itself was improperly noticed and thus invalid under *LPCO Bylaws, Article X(a), and Article XI, Section 1(c) and (d)*, as well as *Convention Standing Rule 1(b)* for timing. The Judicial Committee has appellate jurisdiction to hear and decide this matter under *LPCO Bylaws, Article IX, Section 4(a)(5)*, as it involves an appeal from actions taken without authority of the *LPCO Bylaws*. This appeal meets the requirements of *LPCO Bylaws, Article IX, Section 5(a)*, as it is presented by a Party Member, Hannah Goodman and submitted in writing within thirty (30) days of the disputed actions that began on June 28, 2025.

2. PETITIONERS

This appeal is brought by petitioner Hannah Goodman, hereinafter LPCO Chair, in her capacity as Chair of the Libertarian Party of Colorado, on behalf of the LPCO at the direction of the LPCO Board of Directors which voted unanimously at a regular LPCO Board meeting on July 14, 2025 to approve this petition. Petitioner is a life-time member of the Libertarian Party and is authorized under *LPCO Bylaws, Article VII, Section 3(a)*, to act on behalf of LPCO in administrative and executive matters, including enforcing compliance with the Bylaws, calling conventions, and sending communications and notices.

3. RESPONDENTS

The Respondents are representatives and members of the usurping persons, collectively hereinafter the Harlos Group, including all those who participated in the June 28, 2025 meeting and purported convention namely, Keith Laube, lifetime member of the Libertarian Party and purported Chair of the invalidly formed Emergency Board Oversight Committee (EBOC), and any other individuals acting under the purported authority of the June 28, 2025 meeting, including but not limited to Marc Montoni (purported Convention Chair Pro Tem), Jeffery Orrok (purported Convention Secretary Pro Tem), Daniel Lutz, Bette Rose Ryan, and Douglas Jones (purported EBOC members), and John and Jane Does 1-28 (known and unknown participants in the purported convention).

4. AFFECTED PARTIES

The parties affected by these invalid actions include:

(a) Members of the LPCO Board of Directors, whose legitimate authority as the Sustaining Members' elected representatives and officers of the party has been usurped by unauthorized demands toward the LPCO Board and communications falsely representing the authority of the LPC Board according to *LPCO Bylaws, Article VII, Section 1(c)*;

(b) All Sustaining Members of the LPCO, who have received misleading communications casting doubt on legitimate Party activities including the legitimately called and properly noticed October 18th convention and who have had their right to 45 days notice by mail of all party conventions violated according to *LPCO Bylaws, Article XI, Section 1(c)*;

(c) All Basic Members of the LPCO, who have had their rights to receive notice and be present at all party conventions violated according to *LPCO Bylaws, Article XI, Section 1(d)*;

(d) The LPCO as an Colorado non-profit organization, whose integrity, resources, and operations are threatened by unauthorized attempts by the Harlos Group to access membership lists, distribute and publish false notices, expend funds, and organize meetings;

(e) Affiliates of the LPCO, whose rights to affiliate membership in an organization governed by duly noticed conventions and Board-authorized actions are impinged;

(f) Candidates and campaigns supported by the LPCO, whose efforts may be disrupted by confusion sown by invalid actions and false information.

5. FACTUAL BACKGROUND

The *LPCO Bylaws* require strict adherence to notice provisions for conventions to ensure fair participation and compliance with Party principles and state law. *Article XI, Section 1(c)* mandates direct notice to Sustaining Members via first-class mail at least forty-five (45) days prior to any state convention, with concurrent posting on the Party website. *Article XI, Section 1(d)* requires publication of the time and place in a newspaper of general circulation in each county where Members reside, no later than fifteen (15) days before the convention. *Article X, Section (a)* further requires publication for meetings to elect Party Directors or nominate candidates. Both *Article X, Section (a)* and *Article XI, Section 1(d)* are written to be in compliance with state law *C.R.S. § 1-4-1301(1)(h)* which requires 15 days notice to be published in a newspaper of general circulation in each county in which members of the party reside for any meeting or assembly where the party's candidate might be nominated or officers elected. See ATTACHMENT A.

The 2025 LPCO State Convention was initially scheduled for May 31, 2025, near Keenesburg, Colorado, but was canceled by the venue. With the requirement to send direct notice via first-class mail at least forty-five (45) days prior, the venue could not be relocated quickly enough to be properly notified for May 31st. Members were notified of the cancellation. See ATTACHMENT B.

The convention was rescheduled to June 28, 2025, in Holyoke, Colorado. The LPCO Board sent direct notice via postcards to Sustaining Members at least forty-five (45) days prior. However, the LPCO Chair and Executive Director sent an email on Tuesday, June 24, 2025, stating that they made an error in setting up the state convention by failing to provide proper newspaper notice 15 days before the convention. See ATTACHMENT C.

Upon information and belief, Caryn Ann Harlos, hereinafter Harlos, entered into a conspiracy to hold a parking lot convention at the location of the cancelled May 31 Keenesburg convention but was discouraged from the effort by not having the support of a parliamentary opinion for this action. See ATTACHMENT D.

Upon information and belief, Harlos reorganized the cancelled Holyoke convention into the clandestine June 28 meeting and initiated the illegitimate proceedings after demanding a point of order when no meeting had been called. The LPCO Chair was present and attempted to inform the membership in attendance that no legitimate meeting could be held and she would not be calling the meeting to order.

Represented in the Harlos Group were those whom Harlos conspired with for submission of independent candidate electors to the Secretary of State last year to improperly replace and disenfranchise the Libertarian Presidential Electors selected by voting members at the 2024 regular state convention as part of her previous efforts to disrupt LPCO activities. Harlos has heretofore demonstrated a pattern of usurpation and interference with legitimate authority in her personal capacity and also through the organizing of others in an attempt to manipulate their memberships right for her purposes.

In response to the Harlos Group's efforts threatening to conduct illegitimate proceedings in place of the cancelled Holyoke convention location, two additional emails were sent to combat false information intentionally spread by some party members. Each email warned that no valid convention could take place that Saturday due to the notice failure. Ignoring the *LPCO Bylaws* the Harlos Group justified their actions claiming that Colorado nonprofit law provides them with the authority to hold their convention so long as they did not hold elections for directors. See ATTACHMENT E.

Purportedly, a total of twenty-eight (28) sustaining party members held a convention at the location of the cancelled 2025 State Convention in Holyoke on Saturday, June 28, 2025 at 9:52am in violation of *LPCO Convention Standing Rules 1(b)*. This occurred despite the repeated communication of the official emails and in person warnings that no valid business could be conducted that day. Upon information and belief, Harlos nominated Marc Montoni as chair pro tem of the meeting. They held invalid votes on proposed bylaw changes that had been posted on the LPCO website and for members to the Judicial Committee, and passed several invalid resolutions. Notably, the attendees passed the herein challenged resolution creating an "Emergency Board Oversight Committee", hereinafter EBOC, to purportedly oversee the completion of convention business. See ATTACHMENT F.

Purportedly, the resolution forming the EBOC named Keith Laube as chair and Jeffory Orrok, Daniel Lutz, Bette Rose Ryan, and Douglas Jones as members and purported to empower the committee to expend up to \$5,000 from Party accounts for securing a convention location, obtaining the Sustaining Membership list for notifications, instructing the Board to publish information on the Party website, publishing newspaper notices, and exercising other powers to ensure completion of annual convention business. The resolution claimed this was a "legally enforceable duty" on the Board and noted that it was for an adjourned meeting. Purportedly, the meeting was then adjourned to the call of the EBOC Chair, with Jeffory A. Orrok acting as Convention Secretary Pro Tem. The next day, a parliamentary opinion was sent to all Sustaining Members indicating that any action taken at this purported meeting would be null and void as it violated a fundamental principle of parliamentary law. See ATTACHMENT G.

On and about July 2, 2025, the LPCO selected a new convention date, secured a new convention venue, published the convention time and location on the LPCO website, sent emails to all LPCO Sustaining Members, secured legal notice of the convention in the Denver Post and Colorado Politics print newspapers, and sent mail notice to LPCO Sustaining Members. All of these decisions and communications were to properly complete the notice requirement of the *LPCO Bylaws* and announce the rescheduled LPCO 2025 State Convention for Saturday, October 18, 2025, 9:00 AM at Highlands Events Center, 3550 Federal Blvd, Denver, CO 80211. See ATTACHMENT H.

On July 7, 2025, Keith Laube, claiming to act as EBOC Chair, emailed the LPCO Board demanding the list of Sustaining Members and their mailing addresses, referencing the invalid resolution. He also specified that the list should be the same as that used for the June 28 postcards. See ATTACHMENT I.

On July 8, 2025, Keith Laube sent another email to the LPCO Board, instructing them to publish details of a purported continuation of the convention on the LPCO website by the end of the day. The posting was to announce a meeting at 10 a.m. on Saturday, August 23, 2025, at APWU Hall, 1567 E 17th Avenue, Aurora, Colorado, with credentialing starting at 8:30 a.m. Eligibility was limited to Sustaining Members at least ninety (90) days prior to June 28, 2025. The announced business included electing new Board Members (Chair, Vice Chair, Secretary, Treasurer, Affiliates Director, Campaigns Director, Membership Director, Communications Director, and Fundraising Director), a national platform committee member and alternates, and any other items not disposed of at the Holyoke meeting. See ATTACHMENT J.

Around the same time, a letter dated July 8, 2025 was mailed to LPCO Sustaining Members, announcing the August 23 continuation to a list of Sustaining Members obtained without authorization of the LPCO Board. The letter expressed doubt about the LPCO Board's ability to properly notice the already noticed October 18 convention, urged attendance at an alternate illegitimate convention continuation to elect new leadership, and made unfounded claims about the causes and motive of the prior convention cancellations on May 31 and June 28. It cast doubt on the duly elected LPCO Board's legitimacy and the scheduled October 18, 2025 convention, implying the June 28 meeting was valid and that the EBOC was acting to resolve Board incompetence. The letter also quoted *LPCO Bylaws* provisions on conventions to falsely suggest the August 23 meeting complied, despite lacking Board authorization. The envelope containing this letter shows a metered stamp with the date July 9, 2025 or 44 days, not 45 days prior to their August 23 continuation. See ATTACHMENT K.

6. ARGUMENT

First, the June 28 meeting was improperly noticed and therefore void. The *LPCO Bylaws* establish clear requirements for conventions. *LPCO Bylaws, Article XI, Section 1(c)* requires direct first-class mail notice to Sustaining Members at least forty-five (45) days prior. They also require notice to be published in newspapers of general circulation as required by *LPCO Bylaws, Article XI, Section 1(d) and Article X(a)* and *C.R.S. § 1-4-1301(1)(h)*. When the failure to publish was discovered, it was noticed via email to all LPCO Sustaining Members the following day, June 24, 2025. The Harlos Group was on notice that proceeding with the meeting violates the Chair's authority under *LPCO Bylaws, Article VII, Section 3(a)* to call and manage conventions, and *Article XI, Section 2(a)* requiring scheduling and notice.

Second, the adopted parliamentary of Libertarian Party of Colorado, the *12th edition of Robert's Rules of Order Newly Revised (RONR)*, notes that "it is a fundamental principle of parliamentary law that the right to vote is limited to the members of an organization who are actually present at the time the vote is taken in a regular or properly called meeting (45:56)." As this meeting was not "a regular or properly called meeting," any action taken at that meeting violates that fundamental principle. RONR also notes that any action taken in violation of a fundamental principle is null and void (23:6 d).

Third, the lack of proper newspaper publication invalidates any election or business conducted, as *LPCO Bylaws, Article X(a)* explicitly require this for meetings to elect Directors or nominate candidates. Basic Members of the Libertarian Party of Colorado do not receive notice mailed to their homes like Sustaining Members do and must rely on newspaper publication to be notified of upcoming conventions of which they have a right to attend. The Harlos Group's actions attempted to conduct party business without respect for absentee rights. They usurped Board authority and violated Basic Members' rights.

Fourth, Harlos initiated business proceedings at 9:52am on June 28, 2025. Even if Basic Members had been properly noticed of the convention and the business proceedings properly called to order, *LPCO Convention Standing Rules 1(b)* requires the meetings begin at the time that they were noticed, in this case 10:00am.

Fifth, the letter for the August 23 continuation cannot cure the lack of notice for the Harlos Group convention on June 28. The mail notice shows a postage meter stamp on the envelope with the date of July 9, 2025. That is 44 days, not 45 days as required by the LPCO bylaws before the August 23 continuation. That is 22 days in July and 22 days in August and August 23rd does not count. See *RONR 12ed. 9:4, 9:14(2), 56:34* "the number of days is computed by counting all calendar days (including holidays and weekends), excluding the day of the meeting but including the day the notice is sent."

6. EMERGENCY REQUEST

The *LPCO Bylaws* do not authorize ad hoc committees to override the Board or call meetings without Chair approval. Subsequent communications, including the July 7 and July 8 demands and the letter to Sustaining Members, sow confusion and cast doubt on the legitimate October 18, 2025 convention scheduled by the Board. This produces an emergency dispute regarding Party operations, violates *LPCO Bylaws, Article II* purposes of providing leadership and promoting principles, and constitutes unauthorized representation under *LPCO Bylaws, Article VII, Section 3(a) & (h)*. The formation of the EBOC and its resolutions exceed any authority, as they stem from an improperly noticed meeting improperly begun 8 minutes early. The resolution purports to empower the EBOC to expend funds, demand confidential data and membership lists, instruct the Board, and organize continuations—actions reserved for the LPCO Board under *LPCO Bylaws, Article VII, Section 1(c)* not a clandestine oversight committee. Demanding membership lists violates confidentiality and *C.R.S. § 7-136-102(3)(b)*, as it is not in good faith or for a proper purpose as statute requires.

The Harlos Group has acted in bad faith and caused and will continue to cause harm to the LPCO and the party's Sustaining and Basic Membership. They have held a false convention, elected false party leadership, made false claims against the LPCO Board, scheduled false convention continuations, published false and contradictory convention information, and mailed the same false and contradictory information to the Sustaining Membership with an improperly obtained membership list to dissuade the exercise of voting rights at and participation in the legitimate and properly noticed regular LPCO state convention on October 18, 2025. This conduct harming the rights of Colorado's Libertarians, cannot be ignored. Only a decisive ruling and unrestrained condemnation of the work and schemes of the Harlos Group, noticed to all affected parties, by being published to the Basic Members and mailed Sustaining Members, can begin to remedy the catastrophic threat that continues to erode the legitimacy of the LPCO.

The LPCO Judicial Committee must declare on an expedited basis all the Harlos Group actions null and void to uphold Bylaws integrity, prevent usurpation, and especially to protect Basic Members' rights. The June 28, 2025 meeting failed to comply with the *LPCO Bylaws*, rendering it and all derivative actions null and void. Precedent in party governance supports invalidating improperly noticed conventions. See National Judicial Committee Decision *Bill Hinds vs. Libertarian National Committee* (Decided February 13, 2022) holding that actions taken at disputed meetings purported to change the leadership and rules of the Libertarian Party of Delaware were invalid for lack of proper notice.

7. RULING REQUESTED

On an emergency basis, the requested action of the Judicial Committee is that the purported June 28, 2025 LPCO State Convention and all actions therefrom be declared null and void for violations of the *LPCO Bylaws and Standing Convention Rules*; that the following specific violations and actions be declared null and void:

1. The improperly noticed June 28, 2025 meeting;
2. All resolutions passed therein, including the Resolution to Create the EBOC;
3. Any bylaws adopted or amended therein;
4. The election of any Chair Pro Tem or Convention Secretary Pro Tem therein;
5. The formation of the EBOC and election of the EBOC Chair and members;
6. The July 7, 2025 letter demanding the membership list;
7. The July 8, 2025 letter demanding posting on the website;
8. The letter sent to all Sustaining Members announcing the August 23, 2025 meeting, casting doubt on the October 18, 2025 convention, and promoting invalid actions; and
9. Any continuation of the previous invalid June 28 convention proceedings on August 23, 2025.

Further, the petitioner asks that the Judicial Committee declare that the Chair acted in good faith in getting out the information on the deficiency of notice to the members of the LPCO as soon as practicable. In consequence, the Harlos Group, Keith Laube and associated individuals shall cease all activities under purported EBOC authority; any statements or communications claiming such authority shall be retracted; and a statement shall be inserted in Party records declaring these actions overturned by the Judicial Committee.

/s/HannahGoodman

Hannah Goodman

Chair

Libertarian Party of Colorado

Dated: July 17, 2025

8. APPENDIX

ATTACHMENT A: Relevant LPCO Bylaws (2023-04-02)

ATTACHMENT B: Keenesburg call to convention (April 14, 2025)

ATTACHMENT C: Keenesburg convention cancellation & Holyoke call to convention (May 2, 2025)

ATTACHMENT D: Screenshot of Harlos solicitation on parliamentary forum (May 24, 2025)

ATTACHMENT E: Two additional emails sent to combat false information (June 25 & 27, 2025)

ATTACHMENT F: Resolution to Create the EBOC (June 28, 2025)

ATTACHMENT G: Parliamentary Opinion by Jonathan Jacobs, RP, CCP (June 29, 2025)

ATTACHMENT H: October 18 Call to Convention (July 5, 2025)

ATTACHMENT I: Email from Keith Laube Demanding Membership List (July 7, 2025)

ATTACHMENT J: Email from Keith Laube Demanding Website Posting (July 8, 2025)

ATTACHMENT K: Metered Envelope with Letter Addressed to LPCO Sustaining Members Announcing August 23, 2025 Continuation (July 9, 2025)