

**IN THE JUDICIAL COMMITTEE
OF THE
LIBERTARIAN NATIONAL COMMITTEE, INC.**

BRAD PLOEGER, et. al.
Petitioner

v.

MARK HINKLE, in his official capacity as CHAIRMAN OF THE LIBERTARIAN NATIONAL
COMMITTEE, INC., et al.

Respondent

**PETITION FOR VOIDING A DECISION OF THE NATIONAL COMMITTEE
AND DECLARATORY RELIEF**

1. Statement of Jurisdiction.

The petitioners constitute more than one percent (1%) of the sustaining members of the Libertarian Party. The respondent is the duly elected Chairman of the Libertarian National Committee, Inc. Pursuant to **Bylaw 8.13** and **Bylaw 9.2(d)** the Judicial Committee has express jurisdiction over this complaint.

2. Background.

On or about, February 28, 2012, the respondent by and through the Convention Oversight Committee announced a “minimum” fee of approximately ninety-four dollars (\$94.00) in order for delegates to conduct party business on the convention floor at the 2012 Annual Convention (hereinafter referred to as the “Floor Fee”)

3. On March 11, 2012, the National Committee voted down a motion to make the Floor Fee optional, thus imposing the Floor Fee as a requirement upon the Delegates at the 2012 National Convention.

4. Delegates while assembled in a National Convention represent the ultimate authority within the Libertarian Party. Said authority may be only restricted by provisions listed in the Bylaws, Convention Special Rules of Order, parliamentary authority or applicable law.

5. **Complaint.**

The Floor Fee constitutes an amendment by the National Committee to the Convention Special Rules of Order in violation of **Bylaw 11.10**.

6. The Floor Fee constitutes a substantive amendment to the By-Laws, contrary to and in violation of **Bylaw 17.1**.

7. By adopting the Floor Fee, the National Committee violated **Bylaw 11.3(b)** which grants affiliate parties plenary authority to determine their elected delegates. The Floor Fee constitutes an additional requirement upon the duly selected delegates of the affiliate parties. The authority granted to the affiliate parties may only be restricted by express provisions of the By-Laws. By imposing the Floor Fee, the National Committee violated the autonomy of all affiliate parties to select their delegates in violation **Bylaw 6.5**.

Therefore, the petitioners respectfully request that:

(a) the Judicial Committee enter a judgment that the Floor Fee is in violation of one or more of the abovementioned sections of the Bylaws pursuant to **Bylaw 9.2(d)**; and,

(b) the National Committee be enjoined from requiring any duly-elected National Convention delegate to pay a fee in order to attend a convention business session of the Party.

Signatures

Name	Location	Date
Brad Ploeger		2012-03-11
Joseph Kidd	Atlanta, Georgia, United States	2012-03-11
George Phillies	Worcester, Massachusetts, United States	2012-03-11
Jonathan Loesche	Jacksonville, Florida, United States	2012-03-11
Carol Moore	Washington, District Of Columbia, United States	2012-03-11
paul frankel, Alabama, United States	2012-03-11
Alexander Avery	Fort Wayne, Indiana, United States	2012-03-11
Mark Hilgenberg	South Jordan, Utah, United States	2012-03-11
Jill Pyeatt	Monrovia, California, United States	2012-03-11
Doug Harman	Athens, Georgia, United States	2012-03-11
Wes Wagner	Aurora, Oregon, United States	2012-03-11
Harland Harrison	Belmont, California, United States	2012-03-11
Thomas Hill	West Dundee, Illinois, United States	2012-03-11
Heather Drollinger	Lake Oswego, Oregon, United States	2012-03-11
Courtney White	Ogden, Utah, United States	2012-03-11
Michael Wilson	Olympia, Washington, United States	2012-03-11
Mark Vetanen	Beaverton, Oregon, United States	2012-03-11
Rob Joyce	Farwell, Michigan, United States	2012-03-11
Harry Joe Tabor	Portland, Oregon, United States	2012-03-11
Curt Wagoner	The Dalles, Oregon, United States	2012-03-11
Joseph Cornwell	Portland, Oregon, United States	2012-03-11
James Ogle	Pacific Grove, California, United States	2012-03-11
Jeanne Bojarski	Kansas City, Missouri, United States	2012-03-11
Less Antman	Fallbrook, California, United States	2012-03-11
Phillip Laibe	Jacksonville, Florida, United States	2012-03-11
Glynda Perrotte	Highland, California, United States	2012-03-11
Matthew Barnes	Temple City, California, United States	2012-03-11
Jason Pye	Porterdale, Georgia, United States	2012-03-11

Name	Location	Date
eric guess	portland, Oregon, United States	2012-03-11
Curtis Wolf	Jacksonville, Florida, United States	2012-03-11
Patrick Garrett	Jacksonville, Florida, United States	2012-03-11
Jeff Edgens	Statesboro, Georgia, United States	2012-03-11
Anthony Papillion	Miami, Oklahoma, United States	2012-03-11
Kenneth Prazak	Carpentersville, Illinois, United States	2012-03-11
Doug Craig	Griffin, Georgia, United States	2012-03-11
Starchild Starchild	San Francisco, California, United States	2012-03-11
Darryl Perry	San Antonio, Texas, United States	2012-03-11
Chris Maden	S Grafton, Massachusetts, United States	2012-03-11
David Kornbluh	Johns Creek, Georgia, United States	2012-03-11
Luke McKellar	Beavercreek, Ohio, United States	2012-03-11
STEVEN LINNABARY	COLUMBUS, Ohio, United States	2012-03-11
Charlie Earl	Bowling Green, Ohio, United States	2012-03-11
Bob Bridges	Columbus, Ohio, United States	2012-03-11
Adrian Wyllie	Palm Harbor, Florida, United States	2012-03-12
C. Michael Pickens	Sacramento, California, United States	2012-03-12
Cris Intagliata-Hooker	Riverview, Florida, United States	2012-03-12
Sam Sloan	San Rafael, California, United States	2012-03-12
Calen Fretts	Valparaiso, Florida, United States	2012-03-12
Allan Wallace	Knoxville, Tennessee, United States	2012-03-12
Robert Sherwin	Columbia Station, Ohio, United States	2012-03-12
Tom Fretts	Courtland, Virginia, United States	2012-03-12
Kevin Litten	Cadott, Wisconsin, United States	2012-03-12
Cory Nott	Concord, California, United States	2012-03-12
Alonzo Garbanzo	Yourtown, Oregon, United States	2012-03-12
Nathan Eberly	Bowling Green, Ohio, United States	2012-03-12
Brian Mumpower	Maryville, Tennessee, United States	2012-03-12
Bruce Landers	Cartersville, Georgia, United States	2012-03-12
Richard Segal	Douglasville, Georgia, United States	2012-03-12

Name	Location	Date
Tom Garrison	St. George, Utah, United States	2012-03-12
Richard Moroney	Gainesville, Florida, United States	2012-03-12
Matthew Cholko	Burke, Virginia, United States	2012-03-12
David Kocot	Ontario, California, United States	2012-03-12
Thomas Stevens	Mineola, New York, United States	2012-03-12
Don Webb	Canton, Georgia, United States	2012-03-12
David Terry	McMinnville, Oregon, United States	2012-03-12
Jarrett Dunning	Stuarts Draft, Virginia, United States	2012-03-12
John Myers	Dallas, Texas, United States	2012-03-12
Thomas Cornell	Sparks, Nevada, United States	2012-03-12
Marc Montoni	Dayton, Virginia, United States	2012-03-12
James Gholston	Denton, Texas, United States	2012-03-12
James J Jensen	Jacksonville, Florida, United States	2012-03-12
Bob Williams	Oberlin, Ohio, United States Minor Outlying Islands	2012-03-12
John Wayne Smith	Leesburg , Florida, United States	2012-03-12
Lynn House	Winter Haven , Florida, United States	2012-03-12
Shane Bryce	Decatur, Georgia, United States	2012-03-12
Eugene Flynn	Dallas, Texas, United States	2012-03-12
Aaron Yeargan	Leland, North Carolina, United States	2012-03-12
Michael Brown	Boca Raton, Florida, United States	2012-03-12
Don Kissick	Lima, Ohio, United States	2012-03-12
Karl Dickey	Boca Raton, Florida, United States	2012-03-12
Tom Ruks	Astoria, New York, United States	2012-03-12
Karl Denninger	Niceville, Florida, United States	2012-03-12
Pete Blome	Niceville, Florida, United States	2012-03-12
S C	Altadena, California, United States	2012-03-12
debra payne-dedmon	las vegas, Nevada, United States	2012-03-12
Beth Duensing	anytown, Indiana, United States	2012-03-12
David Montane	Decatur, Georgia, United States	2012-03-12

Name	Location	Date
Amanda Swafford	Flowery Branch, Georgia, United States	2012-03-12
Brian Irving	Cary, North Carolina, United States	2012-03-12
David Yett	Portland, United States Minor Outlying Islands	2012-03-12
Mary Ruwart	Burnet, Texas, United States	2012-03-12
John Clifton	Jamaica, New York, United States	2012-03-12
Richard Opheim	Kenmore, Washington, United States	2012-03-12
Scott Allen	Clinton Township, Michigan, United States	2012-03-12
Jeff Weston	Portland, Oregon, United States	2012-03-12
Ben Valdez	West Jordan, Utah, United States	2012-03-12
Gerald Kosch	David City, Nebraska, United States	2012-03-12
Stuart Simms	Laurel, Maryland, United States	2012-03-12
Kelly Barnes	Ontario, California, United States	2012-03-12
Eve Berkson	Portland, Oregon, United States	2012-03-13
Anthony Wall	Bristol, Tennessee, United States	2012-03-13
Crystal Gross	Marietta, Georgia, United States	2012-03-13
Adam Brooks	Asheboro, North Carolina, United States	2012-03-13
Elaine Wilson	Olympia, Washington, United States	2012-03-13
Doug McNeil	Baltimore, Maryland, United States	2012-03-13
Raymond Carr	Burnet, Texas, United States	2012-03-13
Fred Mangels	Eureka, California, United States	2012-03-13
Jay Polk	Townsend, Tennessee, United States	2012-03-13
Vincent Marcus	Layton, Utah, United States	2012-03-13
Daniel Tobias	Boca Raton, Florida, United States	2012-03-13
Ronald Bream	PORTLAND, Oregon, United States	2012-03-13
Gale Morgan	Sacramento, California, United States	2012-03-13
Geoffrey Neale	Bee Cave, Texas, United States	2012-03-13
Bryan Riddle	Decatur, Georgia, United States	2012-03-13
Lee Brennise	Saint Paul, Minnesota, United States	2012-03-13
Chuck Donovan	Mableton, Georgia, United States	2012-03-13

Name	Location	Date
EDWARD GLUCK	TERRE HAUTE, Indiana, United States	2012-03-13
Barbara Howe	Oxford, North Carolina, United States	2012-03-13
dick shaw	memphis, Tennessee, United States	2012-03-13
Derek Pomery	Bowie, Maryland, United States	2012-03-13
RICHARD PRAWDZIENSKI	EDMOND, Oklahoma, United States	2012-03-13
Jason Hihn	Cockeysville, Maryland, United States	2012-03-13
Richard Augenfeld	Baker City, Oregon, United States	2012-03-13
TJ Campbell	Mountain View , California, United States	2012-03-13
John Lewis	Smyrna, Georgia, United States	2012-03-13
Joe Dehn	Stanford, California, United States	2012-03-13
Jlm Fulner	Berkley, Michigan, United States	2012-03-13
Robert Jim Fulner	Berkley, Michigan, United States	2012-03-13
Thomas Rhodes	Beverly Hills, Florida, United States	2012-03-13
José Castañeda	South Gate, California, United States	2012-03-13
mark mc mains	cary, North Carolina, United States	2012-03-13
Howard Schoen	Edison, New Jersey, United States	2012-03-13
laura Conner	Lawrenceville, Georgia, United States	2012-03-13
Jason Sharp	Greenwood, Indiana, United States	2012-03-13
Bert Pickell	Indianapolis, Indiana, United States	2012-03-13
Shane Killian	Stanley, North Carolina, United States	2012-03-13
Chuck Moulton	Fairfax, Virginia, United States	2012-03-13
Len Flynn	Morganville, New Jersey, United States	2012-03-13
Steve Dutner	Elgin, Illinois, United States	2012-03-14
David Speight	Lexington, North Carolina, United States	2012-03-14
George Reynolds	Conowingo, Maryland, United States	2012-03-14
Ibrahim Zallum	Fort Collins, Colorado, United States	2012-03-14
Brandon Evangelista	Toronto, Canada	2012-03-14
Beverly Wilcox	Wentworth, North Carolina, United States	2012-03-14
JR Enfield	Kingsport, Tennessee, United States	2012-03-14
Jacqueline Mason	Lynchburg, Virginia, United States	2012-03-14

Name	Location	Date
Mike Spalding	Littleton, Colorado, United States	2012-03-14
David J. McDonough	Las Vegas, Nevada, United States	2012-03-14
Thadius Main	Washington, District Of Columbia, United States	2012-03-14
Heather Fazio	Austin, Texas, United States	2012-03-14
Ethan Garofolo	Round Rock, Texas, United States	2012-03-14
IAN KULL	DENTON, Texas, United States	2012-03-14
Benjamin Farmer	Odessa, Texas, United States	2012-03-14
Brenda Kistler	Groves, Texas, United States	2012-03-14
John Spivey	Colleyville, Texas, United States	2012-03-14
Sterling Russell	Spring, Texas, United States	2012-03-14
Danny Anderson	Midland, Texas, United States	2012-03-14
Christine Rainwater	Duluth, Georgia, United States	2012-03-14
Roy Hall	Spring, Texas, United States	2012-03-14
Gail K Lightfoot	Arroyo Grande c, California, United States	2012-03-14
Seth Hollist	Wylie, Texas, United States	2012-03-14
Bob Townsend	Conroe, Texas, United States	2012-03-14
christopher barber	decatur, Georgia, United States	2012-03-14
Anita Wright	Tipton, Iowa, United States	2012-03-14
Matt Godown	Marietta, Georgia, United States	2012-03-14
Orlando Mason	Lynchburg, Virginia, United States	2012-03-15
Steve Susman	Houston, Texas, United States	2012-03-15
John McAchran	Irving, Texas, United States	2012-03-15
Scott Berkey	Randolph, Vermont, United States	2012-03-15
travis peterman	Broomfield, Colorado, United States	2012-03-15
Arthur Torrey	North Billerica, Massachusetts, United States	2012-03-15
Bill Collins	El Paso, Texas, United States	2012-03-16
Curry Taylor	Dallas, Texas, United States	2012-03-16
Richard Hunter	Alvin, Texas, United States	2012-03-16

Name	Location	Date
Ruth Ferris	Portland, Oregon, United States	2012-03-16
Brian Stack	South Kingstown, Rhode Island, United States	2012-03-17
David Perkins	Clackamas, Oregon, United States	2012-03-17
Aubrey Freedman	San Francisco, California, United States	2012-03-17
Elizabeth Richardson	Charlestown, Rhode Island, United States	2012-03-17
Hardy Macia	Canterbury, New Hampshire, United States	2012-03-17
Lisa Ringer	Oakland, California, United States	2012-03-17
Tim Warnecke	Eugene, Oregon, United States	2012-03-17
Howard L. Wilson	Andover, New Hampshire, United States	2012-03-17
Mary-Anne Wolf	North Billerica, Massachusetts, United States	2012-03-17
chris tate	Raleigh, North Carolina, United States	2012-03-17
Brad Fults	Austin, Texas, United States	2012-03-17
Michael Acree	Walnut Creek, California, United States	2012-03-17
Michael Kielsky	Scottsdale, Arizona, United States	2012-03-17
Morgan Cambern	Phoenix, Arizona, United States	2012-03-17
Halina Reed	Scottsdale, Arizona, United States	2012-03-18
Nathan Lowrie	Silverton, Oregon, United States	2012-03-18
john lindsay	dallas, Texas, United States	2012-03-18
Chris Will	Mesa, Arizona, United States	2012-03-18
Arvin Vohra	Bethesda, Maryland, United States	2012-03-18
William Barker	Glendale, Arizona, United States	2012-03-18
Brendan Kelly	Seabrook, New Hampshire, United States	2012-03-19
Shawn Fox	San Diego, California, United States	2012-03-19
Andrea Garcia	Mesa, Arizona, United States	2012-03-19
Erik Viker	Selinsgrove, Pennsylvania, United States	2012-03-19
Jeffrey Haskovec	Dallas, Texas, United States	2012-03-19
Christina Tobin	Chicago, Illinois, United States	2012-03-19
Sabastian Piedmont	Albion, New York, United States	2012-03-19

Name	Location	Date
Tanuja Paruchuri	Chevy Chase, Maryland, United States	2012-03-19
Eric Blitz	Parkton, Maryland, United States	2012-03-19
Christopher Thrasher	Mt. Freedom, New Jersey, United States	2012-03-19
John Parker	winston, Oregon, United States	2012-03-19
Richard Jones	Portland, Oregon, United States	2012-03-20
Donald Mathews	Port Orford, Oregon, United States	2012-03-20
Rick Vandeven	Chaffee, Missouri, United States	2012-03-20
Juanita Billings	Fredericksburg, Virginia, United States	2012-03-20
Rita Neumann	Las Cruces, New Mexico, United States	2012-03-20
Richard Whitehead	Aloha, Oregon, United States	2012-03-20
Chrisitian Chirino	providence , Rhode Island, United States	2012-03-20
Lisa Barba	Portland, Oregon, United States	2012-03-20
John A. Barba IV	Portland, Oregon, United States	2012-03-20
Richard Lion	Manchester, Connecticut, United States	2012-03-20
John Wilford	Jacksonville, Texas, United States	2012-03-20
Stephen VanDyke	Lakewood, Ohio, United States	2012-03-21
Mike Montchalin	Pendleton, Oregon, United States	2012-03-21
Jennifer Hopkins	Spring, Texas, United States	2012-03-22
Boyd Leyburn	Atlanta, Georgia, United States	2012-03-22
Laura Valle	SAN ANTONIO, Texas, United States	2012-03-22
James Oaksun	Portland, Maine, United States	2012-03-23
Richard Ploeger	Milton, Georgia, United States	2012-03-23
Brett Bittner	Marietta, Georgia, United States	2012-03-23
Heather Kindrick	Austin, Texas, United States	2012-03-24
Hector Goodman	Peachtree City, Georgia, United States	2012-03-24
Shawn Grissom	Las Vegas, Nevada, United States	2012-03-25
Rdoger Paxton	Marion, Arkansas, United States	2012-03-25
Robert Underwood	Springfield, Massachusetts, United States	2012-03-25
Joy Waymire	Tulelake, California, United States	2012-03-25
Alwin Hopfmann	Rutland, Massachusetts, United States	2012-03-25

Name	Location	Date
Julia Fox	West Dundee, Illinois, United States	2012-03-25
Stephen Meier	Fremont, California, United States	2012-03-25
Ileana Zayas	Marietta, Georgia, United States	2012-03-25
Wayne Chastain	Kingsport, Tennessee, United States	2012-03-25
William Sparkman	Arlington, Texas, United States	2012-03-25
William Raddatz	St Petersburg, Florida, United States	2012-03-25
Izaak Standridge	Charleston, South Carolina, United States	2012-03-26
Erin Childers	Austin, Texas, United States	2012-03-26
William Nygren	Keizer, Oregon, United States	2012-03-26
Carolyn Marbry	Rancho Cucamonga, California, United States	2012-03-26
Josiah Neff	Atlanta, Georgia, United States	2012-03-26
Sarah Dompkowski	Parsonsfield, Maine, United States	2012-03-26