

Case: McLendon vs Hayes and Adams

Allegation: Plaintiff alleges that Defendants Daniel Hayes and Wendy Adams demonstrate a pattern of aggression and fraud for the purpose of gaining political advantage over persons they perceive to be political opponents, and hence violate their LP National Pledge of Non-Aggression. Plaintiff further alleges that Defendants enabled a Republican to unduly influence the internal operation of the LP of Louisiana's State Central Committee.

Evidence & Attachments:

- Excerpts from Facebook IM chain including parliamentarian & Republican Richard Brown, Daniel Hayes, Wendy Adams, Chuck Saucier and others.
 - Snip #5: Daniel Hayes says he does not care if legal accusations are legit.
 - Snip #20: Daniel Hayes targets three specific SCC members for expulsion.
 - Snip #28: One objective of team effort is to get money for Wendy Adams.
 - Snip #35: Republican Brown advises Hayes team on removal of LPL officers
 - Snip #36: Republican gives "Guerilla Rules" to Daniel and Wendy for distribution to their "team"
 - Snip #41: Republican coaches team on making LPL Vice-Chairman James Madison personally liable for cost of ED contract obligations
 - Snip #42: A second objective is to remove from certain LPL officers the ability to manage contractor's work. Republican optimizes case for removal of LPL's Vice-Chairman.
 - Snip #43: Executive Director (Wendy Adams) says "I would like to make James life miserable" – that being James Madison, the Vice-Chair who was managing her contract.
 - Snip #68: Republican gives 2nd reminder to Wendy & Daniel to distribute "Guerilla Rules" to their team & gloats over SCC VC resignation
 - Snip #73: Republican requests audio recording of a SCC teleconference that he's apparently not supposed to attend, and Hayes team members attempt to comply with request
- Audio clip from ~ Feb 2015 message left by Daniel Hayes on Guy McLendon's answering machine
 - For record, plaintiff McLendon is not acquainted with Republican George Peterson. As part of LNC review, Daniel should be asked to provide the Facebook snips in which he claims I was "plotting with the LA Republican SCC to remove officers of the LPL". Such snips do not exist.
 - Regarding Daniel's threat summarized as "buy Scott out", please see attached statement of defense.
- Letter by LPL Chair Adrian Monteleone to Louisiana State Central Committee regarding Wendy Adams performance and contract
- Letter by Ron Paul 2012 Louisiana campaign to Wendy Adams

Discussion of Evidence:

The Hayes team frequently attacks their opposition, and hammers on them until the opponents align with their faction or leave. In that fashion, their team is able to gain majority control of a body. In Snip #5, Daniel suggests Henry Herford should ask his attorney to accuse Charlie Davis of witness intimidation, and he then says "Who gives a shit if its legit ... I believe in buzzing these fuckers." Point being: Mr. Hayes makes a general statement that he is fine with knowingly making FALSE charges as a means to attack his opponents.

Snip #41 shows team also using commercial liability to influence actions of LPL officers. Mr. Madison said he was aware of this commercial exposure when he resigned. The information from former LPL Chairman Monteleone suggests that Mr. Madison's judgement on contract management was probably reasonable; so, the positions

taken by the team in snips #42 & #43 were probably improper. The letter from the Ron Paul 2012 campaign suggests the pattern of behavior is not limited to the LP as an organization.

Evidence items Snip #36, #68 and #73 above support an allegation that Daniel Hayes and Wendy Adams may function as middle managers who accept direction from Republican Richard Brown. The Republican developed a reference "Guerilla Rules", and delegated to them the task of forwarding information to their team members. Efforts to give recording(s) of internal LPL discussions to a Republican for his reference also seem improper.

Requested Relief:

Issue a directive for Daniel Hayes and Wendy Adams to cease usage of aggression against fellow Libertarians for their political advantage and commercial gain, and issue a Robert's Rules disciplinary citation.

Justification for Relief:

LP members will continue to be harmed by the defendant's aggression unless action is taken. This pattern of behavior should not be ignored or swept under the rug.

Basis of Legal Standing by Plaintiff:

Defendants have demonstrated a pattern of behavior in which they frequently attempt to force out fellow members of LP of Louisiana SCC. A few known victims of Defendant's aggression include the following past or present LP members: Guy McLendon, James Madison, Jen Werther, Scott Lewis, Reed Ebarb and former LP Chair Adrian Monteleone.

As part of the defendant's pattern of behavior, plaintiff suffered injury by a previous attack managed by the defendants. In that instance, the defendants lobbied SCC to consider having leadership roles in the organization Our America Initiative as being an ethical conflict of interest. Plaintiff consequently resigned as South Regional Director of OAI in part due to harassment by the Defendants.

Burden of Proof:

https://en.wikipedia.org/wiki/Legal_burden_of_proof

Considering the following factors, the plaintiff asks SCC to use the level "Substantial Evidence" burden of proof in evaluating merits of the case:

- Our organization lacks legal subpoena power, so legal discovery is not an option
- The Libertarian Party is exposed to credible risk when member(s) of our own body are working with at least one member of the Republican Party for purpose of harassing and expelling LP members