Dear Members of the Judicial Committee:

I am submitting this reply, not on behalf of appellants, but as an interested member in support of the arguments discussed below originally submitted by the appellants. This will be short and only adding additional information or clarification that I see may be necessary.

I commend the appellees' well-written response.

Standard of Review: The ultimate standard is the Party principles. I am aware that the appellees and I will sharply disagree, but I am one of a contingent of people who believes that RONR expertise has been used to gain unfair advantage throughout this Party writ large, and I say this as one with more than average proficiency in them. There is a growing groundswell of support to ditch RONR in its entirety for Francis and Francis at the next national convention, and I expect this convention will be one of the examples used by the proponents. I will always maintain that the spirit of equity prevails, or we have become just as ridiculous as the state.

It is patently obvious that the delegates were objecting and simply didn't know the magical procedure to invoke. Hindsight is 20/20 and no aspersions are cast on convention officials who had to respond in the heat of the moment, but at such a time, the best action would have been to spoon-feed to the delegates what they need to do. Chair Sarwark does this often to both the LNC and convention delegates, even when what those bodies want to do is foolish in his eyes.

No one is alleging minor procedural errors here of which there are numerous at any meeting, but ones in which fundamental rights have been called into question. Appellees note that the only breaches that can be considered by the Judicial Committee are those that are breaches of the bylaws (not convention rules) – and that breaches of rules must be brought up at the time they happened. We agree to a point. But as I shall supplement, the appeal notes breach of bylaws and multiple attempts by the delegates to raise points of order that may have been clumsy but still preserved their rights to object.

Convention Rule 8: I disagree that the rule is ambiguous to any average person not looking for a way to make it ambiguous. The claim that it only instructs the manner in which recommendations are reported but not voted upon stretches interpretative credulity and requires that sentences be read completely void of context. Knowing that brevity has been the rallying cry for about a decade in this party, one cannot expect verbose legalese to ensure a plain common-sense reading. The procedure is to report and vote plank by plank-those two concepts are related. That was not followed. This was objected to by at least two separate delegates, one during the debate, and one afterwards as they needed time to attempt to find assistance to articulate the issues. Since it is obvious that this was an issue at the time, and not merely an after the fact convenience, yes, it is relevant to the Judicial Committee. The appellees claim that the reference to "our procedure" by the delegate at timestamp 2:30:40 is taken out of context of what that delegate meant. Have the appellees interviewed that delegate? Conversations on the floor at that time give me assurance I am correct in my assessment.

Further as to the discussion at 2:37:35, the appellees are claiming they are better interpreters of what one of the signatory appellants meant then they were. That is cheeky but not persuasive. The death penalty was used as an example of the types of issues that go undiscussed in a mass deletion and adoption.

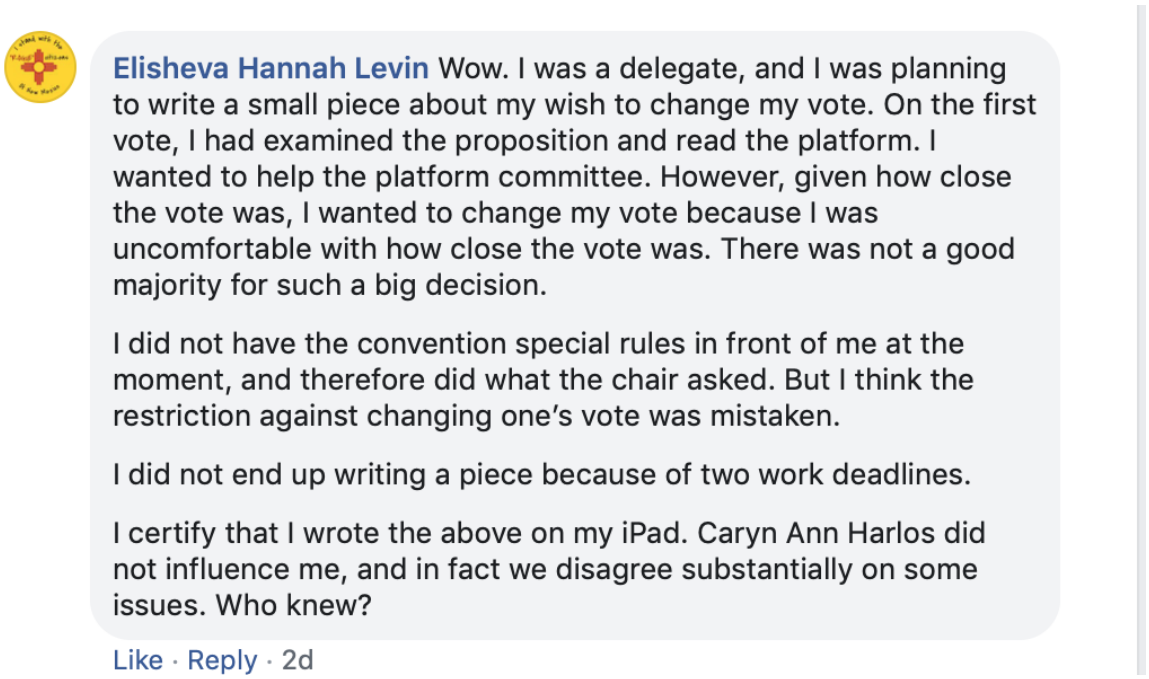
Consideration by Seriatim: The appellees try to claim that since text was being deleted, and not added, that this is not "adopting" a platform. When there was already an existing platform, and such would replace that platform with an existing text comprising a series of articles, yes this would apply. This is another example of lawyering up RONR to the point that the average person has no hope of equal footing. This is shown by the attempted abnegation of the phrase "matter of course" by combining it with the language that talks about what can be done if it is not done as a matter of course which is entirely contrary to the purpose of the whole section.

Incorrect Answer to Point of Inquiry: It is at this point that the Chair could have (and it is not unreasonable to expect considering the mood of the room) said, what you are asking is X but it appears what you want is Y so let me answer X and if it is Y, this is what you need to do. The parties in greater power have a greater duty to those in an inferior position of power and understanding.

Intention of a Member Improperly Cast: The quotation of the delegate to the Chair that the recount was asked because the Chair counted wrong was not put in to make it seem like that delegate was disparaging his fellow delegate who asked for the count. The purpose, rather, was to show that the delegate was stating such as the case when it was not stated by the original requesting delegate. The appellees assume that the **only** reason to ask for a counting vote when there already was a counted vote is a belief that the chair counted wrong. No it isn't. It could be to cause the delegates to take verbal ownership of their vote or to think twice in general. Since RONR recognizes that different methods and requests for re-taking a vote can be done if it is thought that the vote is unrepresentative, it is a perfectly legitimate reason to do so.

As far as the appellees' suggestion that the appellants' statement that a different method of voting might cause members who held back from voting or properly considering their vote to do so was not found in RONR, I would refer the Judicial Committee to RONR 280.18-19 where that concept is certainly addressed (i.e., a rising vote may be "more effective in causing a maximum number of members to vote"— *ergo,* granting that some methods may have such an effect and that is a valid reason to ask for one over the other).

Denial of Right to Change Vote: Appellees claim it is mere hearsay that any delegate would have changed their vote. I proffer this statement from Ms. Elisheva Levin posted on my Facebook page as follows after she reviewed the filings in this matter:



She did what the chair asked. But wanted to change her vote. When there is a pending request for a re-count the vote results are not final and the delegates have right to change their vote. This was fatally precluded by the Chair.

Vote Threshold Required: The meaning is not unclear or uncertain. The goal of the Platform Committee Chair was to delete and replace. It was not simply to delete an unpopular plank or two. In fact that is what the Platform Committee Chair intended to do – but then was counseled it had to be two separate motions. It is at this point, that there then was a duty to tell the delegates their options if the appellees are going to rely upon distinctions of parliamentary subtleties to get around the clear protections of that bylaw. The option to take it all as one motion with a higher threshold should have been clearing offered. It was not.

In the interest of saving time, these are the only points that I think needed further clarification. Thank you for your service to the Party and Liberty. This was written at the end of a very long and draining week, so I ask the indulgence of the readers to graciously overlook any missed grammar or spelling issues (the metadata will show this was finished 10 minutes before the PST deadline).

I make no representations that the appellants agree with anything I added herein as they did not ask me to prepare this nor have they reviewed. I also restate my intention to have this received as support by an interested member, not a party to this appeal, and is certainly not a request to become a party to the appeal.

Respectfully submitted in Liberty,
Caryn Ann Harlos