

**IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
(Civil Division)**

**CAROLE ELIZABETH VEST,**  
c/o The Veritas Law Firm  
1225 19<sup>th</sup> Street, NW, Ste. 320  
Washington, DC 20036  
**Plaintiff,**

v.

Case No.: 2024-CAB-002804

**ANGELA MCARDLE, and**  
Serve: Oliver Hall, Counsel  
1444 Duke Street  
Alexandria, VA 22314

**LIBERTARIAN NATIONAL COMMITTEE :**  
Serve: Oliver Hall, Special Counsel  
Libertarian National Committee  
1444 Duke Street  
Alexandria, VA 22314  
**Defendants.**

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**COMPLAINT**

**COMES NOW**, the Plaintiff, **BETH VEST** (“Vest”), individually and on behalf of the Libertarian National Committee as a derivative action, by and through undersigned counsel, against the Defendants, **ANGELA MCARDLE** (“McArdle”), and the **LIBERTARIAN NATIONAL COMMITTEE** (the “LNC”), and files the instant Complaint, and in support thereof, states as follows:

1. Defendant McArdle, Chair of the LNC, has violated her fundamental fiduciary duties and duties of loyalty to the LNC and to the Libertarian Party as a whole through self-dealing, outright violations of core principles of the Party, diversion of Party assets to unrelated third-parties, misuse of Party assets, the ordering payments of tens of thousands of the Party’s funds in self-interested transactions, and the failure to disclose clear conflicts of interest existing in several other transactions commanded by her through her tyrannical rule over the LNC. Once

elected, Libertarians undoubtedly expected she would uphold her duties of loyalty, care and obedience to the LNC, but time has revealed to Vest and many others that McArdle's self-interests have controlled the vast majority of her decisions. As McArdle has attempted to wrongfully conceal many, many transactions through cover of closed, executive sessions in several instances in which Vest was refused entry and participation, Vest, as a Director of the LNC and a Libertarian who maintains the core beliefs of the Party, has been forced to turn to this forum as a last resort to stop McArdle before she ultimately destroys the Party forever, as McArdle and other members of her rogue LNC circle failed to take action after Vest's sincere demand for McArdle to be removed as Chair. With the Party's Convention mere weeks away, McArdle's explicit, ruthless, and continual fiduciary duty violations must be stopped through her immediate suspension and removal so that the LNC and Libertarian Party can proceed with the Convention in a manner consistent with the core values of the. Indeed, as Chair, McArdle, without immediate ouster, will preside over the Convention, with full authority to direct any and all related procedures and affairs and control LNC's use of funds for purposes of the Convention. McArdle's actions have already violated the fundamental purpose of a political party and caused many members to flee as well as caused the Party to suffer drastically low fundraising. Her abuse of power and breaches of her fiduciary duties will cause irreparable harm to the Libertarian Party, the nation's third largest political party, if she is not removed. Indeed, as Chair, she replaced the former Executive Director, one who would normally serve as a check on the power of the Chair, with herself, giving herself even more authoritarian control. Although Libertarians by nature hesitate before seeking a judicial remedy, Vest is proceeding because of the grim conclusion that staunching the damage of McArdle necessitates court intervention due to her self-dealing, malfeasance, and dissipation of the Libertarian Party's assets.

## **PARTIES AND JURISDICTION**

2. At all times relevant and currently, Vest is a member and director of the Libertarian National Committee (“LNC”). She has standing to bring this action under the law of the District of Columbia, including under D.C. Code § 29–411.02. Vest brings this direct action as she has suffered a “special injury” as she has a personal stake in McArdle’s misuse of LNC’s assets, to which she has extensively contributed, including monetary contributions and the devoted assets of her experience, time, and work as a Director of LNC. Vest has also suffered a “special injury” as McArdle’s breach of her fiduciary has caused her constituents to question Vest as McArdle has repeatedly refused to include Vest in decision-making processes, but unfairly and without reason blamed her for LNC actions to which she played no part. Vest also brings claims as a derivative action against McArdle as she is a director of the LNC and, despite a clear demand, LNC has failed to suspend and remove McArdle and, in fact, has explicitly stated that it will not undertake any action to remove her as Chair. Further, the law in the District of Columbia supports removal through Court order of McArdle in these circumstances as she has grossly abused the position of Chief and intentionally inflicted harm on the LNC.

3. McArdle is the Chair of the LNC, which is a non-profit organization registered in the District of Columbia. McArdle is an individual, upon information and belief, that resides in California, but has taken many if not all of the relevant actions and transactions referenced herein through domineering control and wrongful executive orders through her position as Chair of the District of Columbia non-profit political entity.

4. The LNC is a non-profit organization that was created under the laws of the District of Columbia and has a principal place of business in Alexandria, Virginia. The LNC operates under its By-Laws, Convention Special Rules, and Judicial Committee Rules of Appellate Procedure. In its applicable By-Laws and Rules, the LNC has the power to suspend an

officer for cause. If an officer is suspended for cause, he/she is considered immediately removed from office and the position considered vacant, subject to replacement under the procedures for appointment of officers.

5. This Court has jurisdiction over this matter under District of Columbia law, including pursuant to D.C. Code § 29–411.01, *et seq.*

### **FACTUAL BACKGROUND**

6. This action centers on McArdle’s abuse of power and breaches of her fundamental breaches of fiduciary duties to the LNC undertaken through her reign exemplified by self-dealing and misuse of the Party’s remaining assets.

7. The chair, along with all members of the LNC, are the board of directors of the nonprofit corporation, Libertarian National Committee, Inc. and owe the LNC fiduciary duties set forth under common law and demanded by statute. As the manager of the LNC’s affairs, the Chair owes fiduciary duties to the nonprofit corporation. The law requires that the Chair “must act in the utmost good faith, and this good faith forbids placing [herself] in a position where [her] individual interest clashes with [her] duty to the” LNC. As Chair, McArdle’s fiduciary obligations to the LNC means that she must manage the LNC solely in its best interest, not as a vehicle for promoting her personal beliefs or causes. Under District of Columbia law, McArdle had the fundamental duty not to engage in self-interested transactions and had to disclose potential conflicts of interest to the persons charged with approving transactions. Indeed, the law supports that McArdle had the obligation to adhere to duties of loyalty, disclosure, and obedience to the mission of the LNC as its Chair, as well as the duty to avoid the wasting of the Party’s assets. Further, McArdle has the fiduciary duty to act in the utmost good faith in her decisions as LNC Chair.

8. District of Columbia law recognizes that the fiduciary duties of the Chair include completely revealing all material information and that nondisclosure of material information could not only breach a fiduciary duty, but also constitute fraud. As the District of Columbia's highest court has explained, "The gist of the action of deceit is the producing, with fraudulent intent, of a false impression upon the mind of the other party. It is unimportant, if this result is accomplished, whether the means employed are affirmative or negative, that is, whether they consist of words or acts, or amount to no more than a concealment or suppression of material facts peculiarly within the knowledge of the guilty party."

9. The Libertarian Party (the "LP") is the third-largest political party in the United States.

10. Per the LP Bylaws, "[t]he Chair is the chief executive officer of the Party with full authority to direct its business and affairs." The Chair is a member of the LNC which was established to control and manage the affairs, properties, and funds of the LP consistently with the purposes of the Party and has power and control through actions requiring the vote of the LNC as well as through powers that can be exerted, rightfully or wrongfully, through closed, executive sessions.

11. As a District of Columbia non-profit, the LNC and its directors and board members are subject to District of Columbia laws, including D.C. Code § 29-406.30, when managing the affairs of the LNC. The members of the LNC are empowered to manage the affairs of the LNC, and as such, are the LNC's directors and board members.

12. On or around May 28, 2022, McArdle was elected Chair of the LNC.

13. As the Chair of the LNC, McArdle is bound to adhere to D.C. Code § 29-406.30 and common law fiduciary duties to the nonprofit corporation.

14. McArdle has undergone a series of actions in breach of her fiduciary duties to the LNC, some of which are outlined here, but certainly others exist, and others undoubtedly remain uncovered. Even more pressing for purpose of this lawsuit, there is little doubt that McArdle will continue acts in line with her prior breach of fiduciary duties that could continue to negatively impact the LNC and Libertarian Party and cause them to suffer irreparable damages.

#### **Self-Interested Diversion of LNC Resources**

15. As an example of her breaches of fiduciary duties, as Chair, McArdle made decisions to divert scarce and valuable LNC resources to hold a fundraiser for and with another private group, which was billed as a joint fundraiser. The LP was listed as a cosponsor, the LP logo was used on the website and materials for the organization, and McArdle was involved with hosting the event.

16. McArdle, however, breached her fiduciary duty to safeguard LNC's assets by permitting the private group to take more than its share of the raised funds.

17. Upon information and belief, the fundraiser resulted in the use of over \$100,000 using LP resources for fundraising and advertising the fundraising event.

18. Under McArdle's inattentive eye, the LP did not receive any compensation for this fundraising event and there was never an internal accounting of all of the LP resources used for this event.

19. McArdle informed the LNC that she, in fact, had created the other organization and demanded a donation of \$1,500.00 of the LP's funds to the new organization.

20. Throughout her time as Chair, McArdle diverted LP resources towards groups and candidates outside of the Libertarian Party.

21. McArdle has breached her fiduciary duty to act in good faith when utilizing, or failing to utilize, LNC assets, such as the headquarters, as well as failing to act in good faith in holding all-committee LNC meetings, and to not act in her own self-interest.

22. Further, McArdle has repeatedly allowed the executive committee to hold closed-door executive sessions and to restrict votes to her chosen, small executive committee in direct violation of the By-Laws requiring open sessions for all meetings, absent a few exceptions (such as for pending litigation). She also has habitually excluded the regional representatives for crucial votes, exemplifying her lack of full disclosure as those decisions circumvent the entire committee becoming aware of and voting on key issues.

23. In repeatedly failing to hold full LNC meetings, she has wasted the headquarters, a valuable asset of the LNC. Continuously throughout her time as Chair, McArdle has held, and continues to hold, LNC meetings with only the officers of LP and in small gathering locations outside of the headquarters. Detrimentially, and wasting an important LNC asset, McArdle has ceased utilizing LNC headquarters. Further, by eliminating full LNC meetings as Chair at the headquarters, she has negated the obvious advantages of brain-storming sessions, accountability controls, and “group think” that all would be possible if she had properly utilized the headquarters.

#### **Breach of Obedience and Loyalty to Fundamental Libertarian Beliefs**

24. To effectuate change in a democracy, political parties must put up candidates for office, especially for important elections such as for the President of the United States, however, McArdle has breached her fiduciary duty to act in good faith to the LNC by failing to maintain ballot access to Libertarian Party candidates across the country.

25. The Bylaws of the LP clearly states that the purpose of the LP includes “electing Libertarians to public office to move public policy in a libertarian direction” and to “nominat[e] candidates for President and Vice-President of the United States, and supporting Party and affiliate party candidates for political office.”

26. As Chair, however, McArdle independently made the decision to disregard ballot access for Libertarian candidates in all fifty states for the 2024 Presidential Election and through her executive powers reduced the numbers of ballots on which LP candidates has potential access.

27. Such callous decreasing of ballot access runs antithetical to the fundamental purpose of the Libertarian Party and her actions breach her fundamental fiduciary duties as LNC’s Chair. While quick action could counter the negative consequences of her control on LP ballot access for the 2024 election cycle, her continued control will very likely deepen the destructive impact of her reign on the LNC and Libertarian Party.

### **Self-Interested Appointments**

28. As Chair, McArdle self-appointed herself the Executive Director of the organization, filling a position vacated previously by an individual with the power to check on the power yielded by the Chair regarding key aspects of the LP, including decisions on employees’ and consultants’ retention and termination and acting the direct report for employees and volunteers. Her now unchecked power as Executive Director has permitted her to act with callous disregard of her conflicts of interest in appointments and retention decisions.

29. McArdle, in her capacity as Chief and Executive Director, hired her life partner, Austin Padgett, as a Fundraising Director for the LP despite his lack of professional fundraising experience.



30. In assigning him to the position, McArdle failed to ever seek applications or otherwise to post for the position of Fundraising Director, but, instead, merely appointed Padgett to that role with compensation in excess of market rates. It is our understanding that he has continued to serve in, and be paid for, that role despite the lack of LNC's approval for him to do so currently.

31. Mr. Padgett now earns an annual income from the LP and McArdle enjoys the benefit of his LP income.

32. At the time in which she retained him, upon information and belief, McArdle failed to disclose her clear conflict of interest with respect to Padgett.

33. The Policy Manual of LNC requires "[e]ach LNC Member" to "disclose to the LNC situations in which such person's own economic or other interests, or duties to others, might conflict with the interests of the Party in the discharge of their duties" at the "earliest opportune moment."

34. Since Mr. Padgett's hiring, donations to the party have been on a steady decrease and membership in the LP has decreased.

35. Despite such serious concerns during his time sitting as Fundraising Director and without LNC approval of his continued retention in that position, McArdle has continued to pay him with LNC assets and left him unmanaged. She has also refused to permit a committee consideration on the retention of another to serve as Executive Director, permitting his retention to continue despite the clear conflict of interest, breaching multiple fiduciary duties including acting solely in the utmost good faith and disclosing conflicts of interest.

### **Lack of Accountability**

36. McArdle has acted independently and without the advice or consent of the entire LNC on numerous occasions, however, most exemplary is her launch of a seemingly failed national billboard campaign.

37. As Chair, McArdle purportedly began a billboard campaign requiring significant LNC funding to challenge federal candidates with the goal of removing them from office. McArdle, however, has failed to disclose any information about this program, including any form of accounting or the manner by which billboards were being placed, funded, and controlled.

### **Interference with State Affiliates**

38. As the third-largest political party in a democratic system dominated by two parties, the importance of grassroots and local affiliates of the LP cannot be overstated. McArdle, however, has consistently interfered with the business and autonomy of state affiliates of the LP as Chief of the LNC.

39. Pursuant to article 5.5 of the LP Bylaws, the LNC cannot interfere with the autonomy of LP affiliates.

40. However, despite this clear prohibition, upon information and belief, McArdle in her role as LNC Chair has been interfering with the autonomy of affiliates, including LP affiliates in Delaware and Michigan.

### **Failed Demands by Vest and Right to Remove McArdle**

41. On February 28, 2024, Vest, through undersigned counsel, sent a demand to the LNC demanding that the LNC immediately suspend McArdle as Chair of the LNC, which would result in her removal as Chair, or otherwise take decisive action to address her extremely significant and repeated breaches of her fiduciary duties.

42. On that date, Vest also sent a demand to McArdle directly demanding that she resign the position on her own due to her multiple, continuous, and significant breaches of fiduciary duties.

43. On April 3, 2024, the LNC, through its Special Counsel Oliver Hall, stated that it refused to undertake any action to remove McArdle as Chair or address her breaches of fiduciary duties.

44. On that same day, Mr. Hall, acting as also counsel for McArdle, stated that McArdle refused to resign as Chair.

45. Additionally on February 28, 2024, Vest demanded (a) access to the minutes of all meetings held by her as Chair, many of which she labeled as executive sessions, but failed to qualify as executive sessions under the LNC bylaws and rules of procedure; (b) a copy of the accounting records of the LNC to attempt to determine the scope of McArdle's misuse of LNC's financial assets; (c) all communications to members for the past three years and (d) all financial statements for the past three years, all of to which she was entitled under D.C. Code § 29-413.02.

46. On April 3, 2024, the LNC, through its Special Counsel Oliver Hall, stated that it refused to provide Vest access to those documents she sought by demand.

47. As a result, Vest has standing under applicable law to proceed with this action to seek immediate ouster of McArdle as Chair due to the irreparable harm suffered by Vest and all members of the Libertarian Party due to McArdle's constant and continuing breaches of her fundamental fiduciary duties.

48. Vest is entitled to access to all of the records she sought.

49. Due to McArdle remaining in the role of LNC Chair, irreparable harm is and will occur and this action is necessary to stop such harm from continuing, harm that could ultimately result in a self-implosion and extinction of the Libertarian Party.

50. Considering the entirety of McArdle's actions and conduct as chair, she has grossly abused the power and position of Chair and/or intentionally inflicted harm on the LNC, including through destruction of its fundamental principles, its funding, its membership base, and its position as an American political party.

51. Under D.C. Code § 26-409.09, the Superior Court may remove McArdle from office in these circumstances and may bar her from being reelected, redesignated, or reappointed.

52. Further, equity supports her suspension and removal in these circumstances.

**COUNT I – BREACH OF BY-LAWS AND FUNDAMENTAL RULES AND PURPOSE  
OF THE LNC / DERIVATIVE ACTION FOR IMMEDIATE SUSPENSION OF  
MCARDLE  
(Against McArdle and the LNC)**

53. Vest incorporates all prior paragraphs of this Complaint as if fully set forth herein, which includes every factual allegation of McArdle's reckless breaches of her fiduciary duties (including, among others, those of loyalty, disclosure, and obedience and to fully disclose conflicts and to prohibit corporate waste).

54. Taken individually and certainly as a whole, McArdle's wrongful actions and breaches of fiduciary duty constitute good cause for her immediate suspension and removal.

55. On February 28, 2024, Vest, through undersigned counsel, sent a demand to the LNC demanding that the LNC immediately suspend McArdle as Chair of the LNC, which would result in her removal as Chair, or otherwise take decisive action to address her extremely significant and repeated breaches of her fiduciary duties.

56. In its applicable By-Laws and Rules, the LNC has the right and power to suspend an officer for cause. If an officer is suspended for cause, he/she is considered immediately removed from office and the position considered vacant, subject to replacement under the procedures for appointment of officers.

57. On April 3, 2024, the LNC stated that it refused to undertake any action to remove McArdle as Chair or address her breaches of fiduciary duties.

58. As such, Vest satisfied all requirements to bring this claim and action under D.C. Code § 29–411.01 *et seq.*

59. McArdle was elected and currently serves as Chair of the LNC and her actions reveal that she will continue to abuse her power and committed breaches of her fiduciary duties that have caused and will cause irreparable harm to the LNC and the Libertarian Party as a whole, including but not limited to, depletion of donations and loss of members, many of all of which is likely permanent, which is antithetical to a political party with the fundamental principles of electing Libertarians to public office, to move public policy in a libertarian direction, and promoting the growth and activities of the Libertarian Party and its local affiliates.

60. Under clear law, as Chair of a nonprofit corporation, McArdle was required to act in good faith, which forbids placing herself in positions where her individual interests clash with the duty to the nonprofit corporation. McArdle was prohibited under applicable law to engage in self-interested transactions and had to disclose potential conflicts of interest to the persons charged with approving such transactions.

61. Even citation to a portion of McArdle's breaches of fiduciary duties provide full support for an order requiring her immediate suspension and removal. As Chair of the LNC, McArdle has breached her fiduciary duty to the LNC by failing to provide ballot access to LP

candidates across the country. As Chair of the LNC, McArdle is a director of the LNC and as such has a duty of obedience to the nonprofit corporation. The Bylaws of the nonprofit corporation require all attempts to gain ballot access for LP candidates, including for the Presidential election, but McArdle has ignored and acted in violation of her obligation and fiduciary duty to seek such access. Throughout her time as Chair of the LNC, McArdle diverted LP and LNC assets and funds to another organization under her control. McArdle launched a national billboard campaign of which she had failed to disclose the nature and details, ignoring repeated requests for substantive explanations. McArdle has a duty to disclose to the other members and directors of the LNC material information which is relevant to their duties to manage the affairs of the LNC. By failing to disclose details of the national billboard campaign, McArdle is in violation of her duty to disclose. As Chair of the LNC, McArdle self-appointed herself the Executive Director of the LNC. Using her hiring power as Executive Director, McArdle hired her boyfriend, Austin Padgett, who resides with her, as Fundraising Director for the organization. This is a clear conflict of interest and in breach of McArdle's duty to act in the best interest of the nonprofit corporation as Mr. Padgett has no professional experience fundraising yet was hired as the Fundraising Director. Since hiring Mr. Padgett, fundraising has dropped significantly. As the Chair of the LNC, McArdle has been interfering with the autonomy of state affiliates of the LP. This is in breach of the LP Bylaws and a breach of McArdle's duty to act in good faith.

62. Considering the entirety of McArdle's actions and conduct as chair, she has grossly abused the power and position of Chair and/or intentionally inflicted harm on the LNC, including through destruction of its fundamental principles, its funding, its membership base, and its position as an American political party.

63. Under the power vested with this Court D.C. Code § 26-409.09 and due to equity clearly favoring Vest and the LNC, the Superior Court must remove McArdle from office in these circumstances and bar her from being reelected, redesignated, or reappointed in the future.

64. Good and just cause certainly exists for her removal.

WHEREFORE, Vest, as a director of the LNC and having fulfilled her requirements to bring this derivative claim on behalf of a LNC apparently too fearful of McArdle to act on its own, respectfully requests that the Court order the suspension and/or removal of McArdle as Chair of the LNC and bar her from holding any LNC post in the future.

**COUNT II – BREACH OF FIDUCIARY DUTY  
(Against McArdle)**

65. Vest incorporates all prior paragraphs of this Complaint as if fully set forth herein, which includes every factual allegation of McArdle’s reckless breaches of her fiduciary duties (including, among others, those of loyalty, disclosure, and obedience and to fully disclose conflicts and to prohibit corporate waste).

66. At all times relevant and currently, Vest is a member and director of the Libertarian National Committee (“LNC”).

67. McArdle owes fiduciary duties to the LNC, including to Vest and breached those duties repeatedly.

68. Vest brings this direct action as she has suffered a “special injury” as she a personal stake in McArdle’s misuse of LNC’s assets, to which she has extensively contributed, including monetary contributions and the devoted assets of her experience, time, and work as a Director of LNC.

69. Vest has also suffered a “special injury” as McArdle’s breach of her fiduciary has caused her constituents to question Vest, as McArdle has repeatedly refused to include Vest in

decision-making processes, but unfairly and without reason blamed her for LNC actions to which she played no part.

70. The LNC's By-Laws required that Vest as Director be permitted to participate in and vote on the actions of the LNC through open meetings with all LNC directors present and accounted for, but McArdle as Chair has only permitted certain directors to participate in key and vastly important meetings that have resulted in harmful policies, misuse of assets, and actions antithetical to the LNC and the Libertarian Party, excluding Vest as a voice of reason from those closed meetings, all of which were improperly held as closed by McArdle. As such, Vest has suffered injuries as a result of McArdle's conduct that are specific to her and are separate and distinct from the LNC as a whole.

WHEREFORE, Vest, as a director of the LNC respectfully requests that the Court order the suspension and ultimate removal of McArdle as Chair of the LNC and bar her from holding any LNC post in the future as well as any other further relief available.

**COUNT III – BREACH OF ACCESS TO RECORDS UNDER REQUIRED D.C. CODE §  
29-413.02  
(Against LNC)**

71. The previous statements and allegations are incorporated as if set forth fully herein.

72. D.C. Code § 29-413.02 entitles a member of a nonprofit corporation to inspect and copy any records of the corporation.

73. On February 28, 2024, Vest demanded (a) access to the minutes of all meetings held as her as Chief, many of which she labeled as executive sessions, but failed to qualify as executive sessions under the LNC bylaws and rules of procedure; (b) a copy of the accounting records of the LNC to attempt to determine the scope of McArdle's misuse of LNC's financial



assets; (c) all communications to members for the past three years and (d) all financial statements for the past three years, all of to which she was entitled under D.C. Code § 29-413.02.

74. On April 3, 2024, the LNC, through its Special Counsel Oliver Hall, stated that it refused to provide Vest access to those documents she sought by demand, apparently withholding vital information from Vest that could be used to inform herself and key members of the LNC of McArdle's wrongful actions.

WHEREFORE, Vest requests that the Court order the LNC to allow Vest to inspect and copy all such records of the LNC in accordance with D.C. Code § 29-413.02 and all further relief permissible.

Respectfully submitted,

**THE VERITAS LAW FIRM**

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