



September 26, 2025

By Certified Mail to:

Chris Lucini
8100 Wyoming Blvd. NE | Suite M4
Albuquerque, New Mexico, 87113

By Email to:

Chair@LPNM.us
ViceChair@LPNM.us
ViceChair2@LPNM.us
Secretary@LPNM.us

Dear Mr. Lucini:

It has come to our attention that you are holding yourself out to the public as Chair of an entity you call “Libertarian Party of New Mexico” (“LPNM”). In connection therewith, you and your associates: (1) operate as a qualified minor political party under the laws of New Mexico and recognized by the Secretary of State of New Mexico, *see* New Mexico Secretary of State, *NM Political Party Information*, available at <https://www.sos.nm.gov/voting-and-elections/voter-information-portal-nmvote-org/nm-political-party-information/> (accessed September 25, 2025); and (2) maintain control of the domain www.lpnm.us and the email addresses using the lpnm.us domain. Your activities in operating and promoting LPNM involve extensive use of federally registered trademarks held by the Libertarian National Committee (“LNC”), including the name “Libertarian Party”, the Libertarian Party torch logo, and the Libertarian Party website maintained at www.lp.org. Such use is unauthorized and constitutes federal trademark infringement in violation of the Lanham Act, 15 U.S.C. §§ 1051 *et seq.* The LNC hereby demands that you immediately cease and desist from your infringement upon the LNC’s intellectual property rights.

As you know, the LNC is the executive body of the national Libertarian Party. The LNC is not affiliated with LPNM. It is affiliated with the Free New Mexico Party (“FNMP”), and FNMP is the sole New Mexico state affiliate of the Libertarian Party. As such, FNMP is the sole entity with the legal right to operate under the trademark protected name “Libertarian Party” in New Mexico. It cannot do so at present, however, because you continue to operate your entity under that name – in clear violation of the LNC’s trademark – despite voluntarily disaffiliating with the Libertarian Party years ago.

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Your continued unauthorized use of the name Libertarian Party confuses the general public, and voters and donors in particular, by creating the false impression that LPNM is affiliated with the Libertarian Party. Indeed, LPNM's website expressly states that "[t]he LPNM is the state affiliate of the Libertarian Party." See Libertarian Party of New Mexico, *A Brief History of the Libertarian Party of New Mexico*, available at <https://lpnm.us/lpnm-updated/lpnm-history/> (accessed September 25, 2025). That false impression is reinforced by multiple other instances in which you make unauthorized use of the LNC's trademarks. For example, LPNM's website invites visitors to "learn more about the Libertarian Party by reading the national platform," with the text linked to the "Our Platform" page of the LNC's copyrighted website at <https://lp.org/platform-page/>. See Libertarian Party of New Mexico, *About the Libertarian Party of New Mexico*, available at <https://lpnm.us/lpnm-updated/about2/> (accessed September 25, 2025). Elsewhere, LPNM's website states that "the party officially adopts the national Libertarian Party platform..." See Libertarian Party of New Mexico, *Issues*, available at <https://lpnm.us/lpnm-updated/about2/lpnm-platform-2/> (accessed September 25, 2025). In yet another instance of your unauthorized use of the LNC's trademarks, the "News" page of LPNM's website links to several press releases printed under the Libertarian Party's trademarked torch logo. See Libertarian Party of New Mexico, *News*, available at <https://lpnm.us/lpnm-updated/about2/recent-news/> (accessed September 25, 2025).

All of this activity appears to be a calculated and intentional effort to mislead the general public, and voters and donors in particular, into the false belief that LPNM is affiliated with the Libertarian Party. That false belief is further reinforced by multiple statements throughout the LPNM website, which reference "Libertarians" or the "Libertarian Party," including:

"The Libertarian Party is a grassroots political organization. ... These affiliates are the building blocks to bringing Libertarians ideas and candidates to people near you," available at <https://lpnm.us/lpnm-updated/elections/county-affiliates/> (accessed September 25, 2025);

"If you're interested in running as a Libertarian candidate for municipal, county, state or federal office, here is some information we hope will be helpful to you," available at <https://lpnm.us/lpnm-updated/elections/run-for-office/> (accessed September 25, 2025);

"Be registered as a Libertarian in NM," available at <https://lpnm.us/lpnm-updated/join/> (accessed September 25, 2025);

"The Libertarian Party of New Mexico is sensitive to the fact that Libertarians in our state hold diverse views on common concerns," available at <https://lpnm.us/lpnm-updated/about2/lpnm-platform-2/> (accessed September 25, 2025).

The LNC has not authorized you to make use of its intellectual property, and any such use is hereby expressly prohibited. We are therefore sending you this letter in an attempt to resolve this matter without the need for legal action. We demand that you immediately cease and desist from making further unauthorized use of Libertarian Party intellectual property, including but not limited to the following:

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- “Libertarian Party” (Reg. No. 2,423,459);
- “The Party of Principle” (Reg. No. 2,423,458);
- Libertarian Party Torch Logo (Reg. No. 6,037,046);
- Libertarian Party Website (Reg. No. Vau 1-490-101; Ref. No. HLIBE-C003-US).

To avoid legal action in this matter, you must immediately cease your infringement upon any and all trademarked or copyrighted LNC materials in any and all online or business-related publications or activities. In particular, you must cease from using the trademarked name “Libertarian Party”, the trademarked phrase “The Party of Principle”, the trademarked Libertarian Party torch logo and the copyrighted website www.lp.org to identify your organization in any published materials, including but not limited to materials available at www.lpnm.us or any other online or digital platform or print medium.

If you do not comply with the demands set forth above, the LNC will utilize all available legal remedies to stop your infringement of its rights and the harm done by that infringement. This shall include, but may not be limited to, action in federal court for: trademark infringement under 15 U.S.C. § 1114; false designation of origin and false advertisement under 15 U.S.C. § 1125; unfair competition under 15 U.S.C. § 1125; and similar common law claims available under applicable state law.

Thank you for your attention to this matter.

Sincerely,

/s/Steven Nekhaila

Steven Nekhaila
Chair
Libertarian National Committee

