IN THE SUPREME COURT	)
Action No	)
Tim Nichols	)
Speaker of Student Congress	
PLAINTIFF	) COMPLAINT
Versus	) ) )
II Daymor	) )
JJ Raynor Student Body President	)
Student Body i resident	)
	)
And Ryan Morgan	)
On behalf of the Board of Elections	)
DEFENDANT	)

- 1. <u>Jurisdiction</u>. The Student Supreme Court has jurisdiction over this controversy under Title III, Section 401A. Plaintiff alleges election misconduct on the part of the Executive Branch of Student Government. Therefore, the complaint is being made against The Executive Branch of Student Government and the Board of Elections as a necessary defendant both of whom this Court has jurisdiction over.
- 2. **Standing**. Plaintiff has standing in the matter under Title III, Section 409 as a student alleging error in a referendum.
- 3. Plaintiff alleges that the Executive Branch violated Election law (Title VI, Section 402 L) when it used University mass email acting on its behalf, to advocate for the passage of the Childcare Services fee referendum. The email clearly stated within its body: "This email is sponsored by: Student Government" and was signed by "The Executive Branch of Student Government". The email contained a link to the Executive Branch website where it urged students to vote for the referendum.
- 4. Plaintiff further alleges that the Executive Branch violated the above code provision by using a Facebook group acting on its behalf to urge for passage of the referendum.
- 5. Plaintiff further alleges that campaign materials supporting the referendum were stored in the Student Government Office, in violation of Title VI Section 405A.
- 6. Plaintiff alleges that the forgoing allegations of misconduct by the Executive Branch resulted in undue influence on the election process of unknown, but potentially widespread proportions.
- 7. Necessary defendants. The alleged violations of law were committed by the Executive Branch of Student Government. The Board of Elections is also a necessary party (Title III, Section 510B(3)).

- 8. **Relief**. Plaintiff asks that in order to preserve a fair revote, the Supreme Court to order a permanent injunction against the Board of Elections prohibiting the release or publication to any outside party of the results of the February 17 Childcare Services fee referendum.
- 9. **Demand for judgment**. Plaintiff asks the Supreme Court to invalidate the results of the February 17, 2008 Childcare Services fee referendum and order that a new vote be held on a date sufficiently delayed so as to minimize the harm and undue influence exerted by the Executive Branch on the election process.

Tim Nichols

Speaker Student Congress ntimothy@email.unc.edu (828)551-6739

I do affirm that I have read in full the foregoing complaint and that the allegations contained therein are true to the best of my knowledge and belief.