

IN THE SUPREME COURT

ACTION NO. 22-007

CONNOR COMMUNITY GOVERNMENT;
et al.

PLAINTIFFS

v.

RESIDENCE HALL ASSOCIATION
EXECUTIVE BOARD;
et al.

DEFENDANTS

MOTION TO ACCEPT EVIDENCE

In order to fulfill the Court's Order Docket No. 22-0076, "Plaintiffs' are encouraged to have background information". The Plaintiff moves that the following attached documents be accepted into the evidentiary record as wholly true and correct copies of the same for the trial of this matter.

1. Mary Miller's e-mail regarding rejection of *Meet the Governor* e-mail
2. *Meet the Governor* e-mail
3. Nate Worley's e-mail regarding initial suspension.
4. Nate Worley's e-mail regarding notification of forthcoming Ethics Hearing.
5. Notification provided to Dean Pearce of their election to Governorship
6. Mary Miller's initial e-mail regarding Community Government application rosters
7. Mary Miller's e-mail regarding final Community Government application rosters
8. Güzin Karagöz's e-mail regarding minutes of the September 13th meeting of the RHA Board of Governors

The Plaintiff further requests that protected personal information be redacted from the documents prior to their public promulgation.

Plaintiff

Dean Avery Pearce

[REDACTED]
[REDACTED]

dapearce@unc.edu

[REDACTED]
[REDACTED]

Counsel for the Plaintiff

Jasmine Alamelu Werry

[REDACTED]

[REDACTED]

jwerry@ad.unc.edu

[REDACTED]

*Filed this the ___th day of October,
2022, at ___:___ —*

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Exhibit 1: Miller's e-mail regarding rejection of *Meet the Governor* e-mail

1.1 Dean Pearce's Affidavit of True Copy

TRUE COPY

I, Dean Pearce, do hereby swear or affirm that the document owner

attached is a true copy of Dean Pearce's Meet the Governor e-mail and that this description of document copy contains no alterations from the original.

[Redacted Signature]
Principal's signature

North Carolina

County of Orange

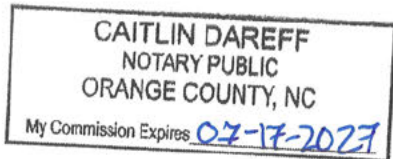
I, Caitlin Dareff, a Notary Public for Orange

County, North Carolina, do hereby certify that Dean Pearce
Name of principal

personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal, this the 4th day of November, 2022

(Official Seal)



[Redacted Signature]

Official Signature of Notary

Caitlin Dareff, Notary Public

Notary's printed or typed name

My commission expires: 07-17-2027

1.2 Content of Exhibit

From: [Miller, Mary Stewart](#)
To: [Pearce, Dean Avery](#)
Subject: Re: Action Requested: Meet the Governor Emails!
Date: Thursday, September 8, 2022 8:06:37
Attachments: [image001.png](#)

Hi Dean,

I hope you had a wonderful long weekend! I wanted to let you know that the Connor Community HeelLife is now up and running again so I am able to send out your letter. The one edit I have is that unfortunately we cannot send external applications or extend the deadline out of fairness to the other communities, but Connor received a great group of applicants through the Google form! Let me know if you have any questions about this – have a great rest of your day!

Best,

Mary S. Miller (*she/her/hers*)

University of North Carolina at Chapel Hill | Class of 2024
Kenan Scholar | B.S. Business Administration & B.A. Public Policy
Vice President | Residence Hall Association
marymill@email.unc.edu | [REDACTED]

From: Pearce, Dean Avery <dapearce@live.unc.edu>
Date: Thursday, September 1, 2022 at 1:35 AM
To: Miller, Mary Stewart <marymill@email.unc.edu>
Subject: RE: Action Requested: Meet the Governor Emails!

Mary,

Attached is my letter to the Connor Community, as well as an additional attachment which I would request that you send along with it.

Thank you,

Dean Pearce

Connor Community Governor

PO Box 1072
Chapel Hill, NC 27514

P [REDACTED] | [REDACTED] E dapearce@unc.edu



From: Miller, Mary Stewart <marymill@email.unc.edu>
Sent: Wednesday, August 31, 2022 13:03

To: Akbarova, Dilbar <dakbaro@unc.edu>; Crump, Mikayla Renee' <mcrump@unc.edu>; Pearce, Dean Avery <dapearce@live.unc.edu>; Lawal, Godspower Mercy <godspower@unc.edu>; Patel, Shreeya Satis <shreeyap@email.unc.edu>; Ruiz, Anthony Michael <amruiz@unc.edu>; Aguzin, Marko <maguzin@unc.edu>; Ahn, Christina Hyunsoh <ahnchris@unc.edu>; Hong, Ye-Bon <yebon@email.unc.edu>; Rhymes, Regan Marie <rrrhymes@unc.edu>; Novak, Mackenzie Paige <mnovak@unc.edu>; Archdeacon, Alden Carl <aarchdea@unc.edu>

Cc: Carter, Erin Mckinley <erincarter@unc.edu>; Worley, Nate C <natew@email.unc.edu>

Subject: Action Requested: Meet the Governor Emails!

Good afternoon govvs,

I hope you are having a great Wednesday! As you know, Community Government applications close at the end of this week and we are making a final push for applicants. If you are interested in sending an email to your community introducing yourself and encouraging them to vote, please send me your draft **by tomorrow at 3PM** (shout out to Ye-Bon for this great idea!). I have attached a wonderful example from Ye-Bon of what this looks like – please include your name and position, a little background about you, the apply to CoGo link, and a picture if you would like. This doesn't have to be lengthy!

I am also happy to send out these introductory emails after the Community Government form closes, but highly encourage getting them in soon to allow folks to get to know you and consider applying. Please let me know if you have any questions!

Best,

Mary S. Miller (*she/her/hers*)

University of North Carolina at Chapel Hill | Class of 2024

Kenan Scholar | B.S. Business Administration & B.A. Public Policy

Vice President | Residence Hall Association

marymill@email.unc.edu | 

Exhibit 2: *Meet the Governor* e-mail

2.1 Dean Pearce's Affidavit of True Copy

TRUE COPY

I, Dean Pearce, do hereby swear or affirm that the document owner

attached is a true copy of Mary Miller's e-mail regarding rejection of Meet the Governor e-mail, as recieved by Dean Pearce and that this description of document copy contains no alterations from the original.

[Redacted Signature]
Principal's signature

North Carolina

County of Orange

I, Caitlin Dareff, a Notary Public for Orange

County, North Carolina, do hereby certify that Dean Pearce
Name of principal

personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal, this the 4th day of November, 2022.

(Official Seal)

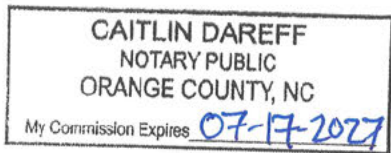
[Redacted Signature]

Official Signature of Notary

Caitlin Dareff, Notary Public

Notary's printed or typed name

My commission expires: 07-17-2027



2.2 Content of Exhibit



Dean Pearce

Email: dapearce@unc.edu

Connor Community
Carolina Housing
SASB North CB #5500
450 Ridge Road
Chapel Hill, NC 27514

September 1, 2022

Residents of the Connor Community,

It is with great pleasure that I announce I will serve as your Community Governor for the upcoming academic year. I thank you for your support in the election, and in the coming weeks.

If I have not introduced myself to you yet, then hello! My name is Dean Pearce, from Raleigh, NC. I am a third year studying Chemistry, Biology, and Russian. In my free time, what little of it I have, I enjoy walking, reading, and rock climbing.

If I have not had the chance to speak with you at length, I would certainly love to meet you; feel free to send me an email at dapearce@unc.edu. If emails feel a little too formal, feel free to fax me at (917) 436-1030 or call me at (704) 247-4208.

I am very excited for the upcoming academic year, and we need your help. In addition to the many positions available in Community Government I am soliciting applications for Building Leads, who will help plan events for their specific community, and, pending reforms to the Community Constitution / Code, will officially stand as the representative of their Building to Community Government.

Community Government elections conducted via the RHA will end at end of day 2nd of September, though I will accept applications for all positions sent to me directly until *September 10th*. To apply via the RHA, use the

following form: <https://tinyurl.com/rhacogo2022>; to send an application to me directly, please use the form found on the last pages of this PDF.

Yours,

Dean Pearce

encl: Connor Community Government Pearce Administration Application
Form

Connor Community Government Application

Pearce Administration for the 2022-2023 Academic Year

Applicant Information

Leave blank if not applicable

Name:

PID:

Residence Hall (mark one): Alexander | Connor | Joyner | Winston

Email:

Phone Number:

Expected Graduation Year:

Which position(s) are you applying for?

Available Positions: Building Lead, Lieutenant Governor; Administrative Coordinator; Treasurer; Marketing Manager; Community Enhancements Officer; Sustainability Officer; Social Justice Advocate; Community Service Chair

You may also suggest your own position!

Please describe your relevant experience



Why did you apply for these positions?

What goals do you have for the community in the coming year?

What do you bring to the Community Government team?

What times would you be available for an interview?

Either in person or online before September 17th



Exhibit 3: Nate Worley's communications regarding initial suspension

3.1 Dean Pearce's Affidavit of True Copy

TRUE COPY

I, Dean Pearce, do hereby swear or affirm that the document owner

attached is a true copy of Nate Worley's e-mail regarding initial suspension, as recieved by Dean Pearce and that this description of document copy contains no alterations from the original.

[Redacted Signature]
Principal's signature

North Carolina

County of Orange

I, Caitlin Dareff, a Notary Public for Orange County, North Carolina, do hereby certify that Dean Pearce Name of principal

personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal, this the 4th day of November, 2022.

(Official Seal)

[Redacted Signature]

Official Signature of Notary

Caitlin Dareff, Notary Public
Notary's printed or typed name

My commission expires: 07-17-2027

CAITLIN DAREFF
NOTARY PUBLIC
ORANGE COUNTY, NC
My Commission Expires 07-17-2027

3.2 Content of Exhibit

From: [Worley, Nate C](#)
To: [Pearce, Dean Avery](#)
Cc: [Carter, Erin Mckinley](#); [Miller, Mary Stewart](#)
Subject: RHA Conduct-Related Suspension
Date: Tuesday, September 13, 2022 8:00:24

Hello Dean,

It is through unfortunate circumstances that I inform you that the RHA Executive Board has decided to temporarily suspend you as the Connor Community Governor following multiple reports of disrespectful and hostile behavior. The length of your suspension is set to last for three weeks starting today, 13 September 2022. With the terms of your suspension, you have been disinvited from RHA spaces including but not limited to; the RHA Board of Governors, Connor Community Government Meetings, and the RHA Heel Print Training retreat. We also are informing you that you are to pause any community government formation-related projects. We will keep you informed if the terms of your suspension change. We would like to have a meeting with you to discuss a path forward with your involvement in RHA, so **please let us know your availability for this week**. I understand this news may be troubling and I want to let you know that we are here to support you as well as offer a list of support organizations that are available to assist you through this tough time.

Best,

Nate C. Worley (*he/him/his*)

University of North Carolina at Chapel Hill | Class of 2024
B.A. Economics, B.A. Public Policy & French Minor
President | Residence Hall Association
natew@ad.unc.edu

Counseling and Psychological Services

<https://caps.unc.edu/>

Heels Care Network

<https://care.unc.edu/resources/>

Community Resources

<https://www.med.unc.edu/wellness/community-resources/>

**Exhibit 4: Nate Worley's communications regarding notification of forthcoming
Ethics Hearing**

4.1 Dean Pearce's Affidavit of True Copy

TRUE COPY

I, Dean Pearce, do hereby swear or affirm that the
document owner

attached is a true copy of Nate Worley's e-mail regarding notification of forthcoming Ethics Hearing, as received by Dean Pearce and that this
description of document
copy contains no alterations from the original.

[Redacted Signature]

Principal's signature

North Carolina

County of Orange

I, Caitlin Dareff, a Notary Public for Orange

County, North Carolina, do hereby certify that Dean Pearce
Name of principal

personally appeared before me this day and acknowledged the due execution of
the foregoing instrument.

Witness my hand and official seal, this the 4th day of November, 2022

(Official Seal)

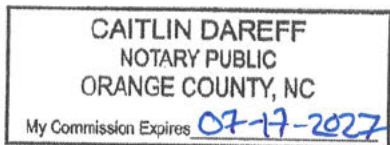
[Redacted Signature]

Official Signature of Notary

Caitlin Dareff, Notary Public

Notary's printed or typed name

My commission expires: 07-17-2027



4.2 Content of Exhibit

From: [Worley, Nate C](#)
To: [Pearce, Dean Avery](#)
Cc: [Carter, Erin Mckinley](#); [Miller, Mary Stewart](#)
Subject: Connor Governor Ethics Hearing Notification
Date: Tuesday, September 13, 2022 18:29:05

Hello Dean,

I wanted to reach out and notify you of an update concerning the email notification of your temporary suspension. The sanction that was provided this morning calling for your temporary suspension by unanimous vote of the Executive Board was not in accordance with our current bylaws as amended 8th September 2021. I would like to formally rescind that suspension. Please excuse this oversight. In accordance with the bylaws as amended 8th September 2021, I am formally notifying you that an ethics hearing is to be called on the following charges

- Harassment
- Hostile Behavior

As per Article VII Section 1 of Residence Hall Association bylaws we are notifying you of the prohibition of any participation in Residence Hall Association spaces including but not limited to; RHA programs and events, RHA Board of Governors meetings, RHA Heel Print Training, as well as any actions pertaining to the office of Connor Community Governor.

In accordance with Article VII Section 3 of the Residence Hall Association bylaws, you are given the opportunity to defend yourself through written testimony under 20 pages. This testimony should be submitted to me via email by Tuesday, September 20th, 2022, at 5:00 PM as your Ethics Hearing has been scheduled for Tuesday, September 20th, 2022, at 6:00 PM. You will be notified of the outcome of the Ethics Hearing via email within 24 hours of the conclusion of your hearing.

Best,

Nate C. Worley (*he/him/his*)

University of North Carolina at Chapel Hill | Class of 2024
B.A. Economics, B.A. Public Policy & French Minor
President | Residence Hall Association
natew@ad.unc.edu

Exhibit 5: Notification provided to Dean Pearce of their election to Governorship

5.1 Dean Pearce's Affidavit of True Copy

TRUE COPY

I, Dean Pearce, do hereby swear or affirm that the document owner

attached is a true copy of Notification e-mail of Dean Pearce of their election to Governorship as recieved by the same from Mary Miller and that this description of document copy contains no alterations from the original.

[Redacted Signature]

Principal's signature

North Carolina

County of Orange

I, Caitlin Dareff, a Notary Public for Orange

County, North Carolina, do hereby certify that Dean Pearce Name of principal

personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal, this the 4th day of November, 2022.

(Official Seal)

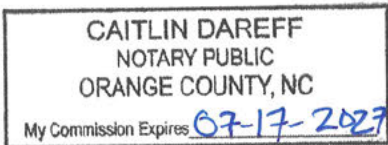
[Redacted Signature]

Official Signature of Notary

Caitlin Dareff, Notary Public

Notary's printed or typed name

My commission expires: 07-17-2027



5.2 Content of Exhibit

From: [Miller, Mary Stewart](#)
To: [Pearce, Dean Avery](#)
Cc: [Carter, Erin Mckinley](#); [Worley, Nate C](#)
Subject: CONGRATULATIONS!
Date: Thursday, August 25, 2022 9:19:30
Attachments: [Packing List.pdf](#)
[BOG Retreat Waiver.pdf](#)
[Friday Arrival Location.png](#)

Dear Dean,

CONGRATULATIONS on being elected Governor of Connor Community for the 2022-2023 school year!!! This is a major accomplishment and we couldn't be happier for you!

As you are aware and as part of your new role as Governor, there is a mandatory leadership retreat **this weekend** where you will get to meet other Governors and prepare for the year ahead. Our Governor retreat will be taking place from Friday at 5:45PM to Sunday around 3PM. We will be going off campus, so please eat an early dinner and then arrive with your things (packing list attached) to the parking lot next to the Student Stores **no later than 5:45PM on Friday**.

To attend this retreat, you will need to **print and sign the attached waiver**. We will collect these documents as we leave for the retreat on Friday. **Please respond to this email confirming your receipt of this message and attendance at this weekend's retreat. Include your phone number and any dietary restrictions in your response.**

Once again, we are very excited to have the opportunity to work with you this coming year and look forward to all the great things you will accomplish on this year's Board of Governors!!

Sincerely,

Mary S. Miller (*she/her/hers*)

University of North Carolina at Chapel Hill | Class of 2024
Kenan Scholar | B.S. Business Administration & B.A. Public Policy
Vice President | Residence Hall Association
marymill@email.unc.edu | [REDACTED]

**Exhibit 6: Mary Miller's initial e-mail regarding Community Government
application rosters**

6.1 Dean Pearce's Affidavit of True Copy

TRUE COPY

I, Dean Pearce, do hereby swear or affirm that the
document owner

attached is a true copy of <sup>Mary Miller's initial e-mail regarding Community Government application rosters
as recieved by Dean Pearce</sup> _____ and that this
description of document
copy contains no alterations from the original.

Principal's signature

North Carolina

County of Orange

I, Nora Herndon, a Notary Public for Orange
County, North Carolina, do hereby certify that Dean Pearce
Name of principal
personally appeared before me this day and acknowledged the due execution of
the foregoing instrument.

Witness my hand and official seal, this the 4th day of November, 2024.

(Official Seal)



Nora Herndon

Official Signature of Notary

Nora Herndon, Notary Public
Notary's printed or typed name

My commission expires: 8/16/2026

6.2 Content of Exhibit

From: [Miller, Mary Stewart](#)
To: [Akbarova, Dilbar](#); [Crump, Mikayla Renee](#); [Pearce, Dean Avery](#); [Lawal, Godspower Mercy](#); [Patel, Shreeya Satis](#); [Ruiz, Anthony Michael](#); [Aguzin, Marko](#); [Ahn, Christina Hyunsoh](#); [Hong, Ye-Bon](#); [Rhymes, Regan Marie](#); [Novak, Mackenzie Paige](#); [Archdeacon, Alden Carl](#)
Cc: [Carter, Erin Mckinley](#); [Worley, Nate C](#)
Subject: CoGo Application Lists
Date: Sunday, August 28, 2022 14:25:12

Hello Govs!

It was wonderful to see you all this weekend – I hope you enjoyed Camp Don Lee! As promised, [here](#) are all of the current Community Government applicants broken up into tabs by community. The application officially closes on September 2nd at 11:59PM and I will send the updated list shortly after that. I highly recommend promoting Community Government applications to students you see in the halls, the lobby, etc. – word of mouth is so impactful! If you have any questions or need any support throughout the selection process, please don't hesitate to reach out. Thanks again for a great retreat, I know you all will accomplish big things this year!

Best,

Mary S. Miller (*she/her/hers*)


University of North Carolina at Chapel Hill | Class of 2024
Kenan Scholar | B.S. Business Administration & B.A. Public Policy
Vice President | Residence Hall Association
marymill@email.unc.edu | 

Exhibit 7: Mary Miller's e-mail regarding final Community Government application rosters

7.1 Dean Pearce's Affidavit of True Copy

TRUE COPY

I, Dean Pearce, do hereby swear or affirm that the
document owner

attached is a true copy of Mary Miller's e-mail regarding final Community Government application rosters
as recieved by Dean Pearce and that this
description of document
copy contains no alterations from the original.

[Redacted Signature]

Principal's signature

North Carolina

County of Orange

I, Nora Herndon, a Notary Public for Orange

County, North Carolina, do hereby certify that Dean Pearce
Name of principal

personally appeared before me this day and acknowledged the due execution of
the foregoing instrument.

Witness my hand and official seal, this the 4th day of November, 2022.



[Redacted Signature]

Official Signature of Notary

Nora Herndon, Notary Public

Notary's printed or typed name

My commission expires: 8/16/2026

7.2 Content of Exhibit

From: [Miller, Mary Stewart](#)
To: [Akbarova, Dilbar](#); [Crump, Mikayla Renee](#)"; [Pearce, Dean Avery](#); [Lawal, Godspower Mercy](#); [Patel, Shreeya Satis](#); [Ruiz, Anthony Michael](#); [Aguzin, Marko](#); [Ahn, Christina Hyunsoh](#); [Hong, Ye-Bon](#); [Rhymes, Regan Marie](#); [Novak, Mackenzie Paige](#); [Archdeacon, Alden Carl](#)
Cc: [Carter, Erin Mckinley](#); [Worley, Nate C](#)
Subject: Updated CoGo Rosters
Date: Saturday, September 3, 2022 11:28:18

Good morning govs!

I hope you all are having a great start to your long weekend! [Here](#) is the updated sheet of CoGo applications – please let me know if you have any issues accessing this document. As always, if you have any questions or would like support throughout this process, I am happy to help out. Best of luck with interviews and enjoy your well-being days!

Best,

Mary S. Miller (*she/her/hers*)


University of North Carolina at Chapel Hill | Class of 2024
Kenan Scholar | B.S. Business Administration & B.A. Public Policy
Vice President | Residence Hall Association
marymill@email.unc.edu | 

Exhibit 8: Güzin Karagöz's e-mail regarding minutes of the September 13th meeting of the RHA Board of Governors

8.1 Dean Pearce's Affidavit of True Copy

TRUE COPY

I, Dean Pearce, do hereby swear or affirm that the
document owner

attached is a true copy of Gizlin Karagöz's e-mail regarding minutes of the September 13th meeting of the RHA Board of Governors, as received by Dean Pearce and that this
description of document
copy contains no alterations from the original.

[Redacted Signature]

Principal's signature

North Carolina

County of Orange

I, Nora Herndon, a Notary Public for Orange

County, North Carolina, do hereby certify that Dean Pearce
Name of principal

personally appeared before me this day and acknowledged the due execution of
the foregoing instrument.

Witness my hand and official seal, this the 4th day of November, 2021.

(Official Seal)



[Redacted Signature]

Official Signature of Notary

Nora Herndon, Notary Public

Notary's printed or typed name

My commission expires: 8/16/2024

8.2 Content of Exhibit

From: [Karagoz, Guzin](#)
To: [2022-2023 Board of Governors](#)
Subject: 9/13 Meeting Minutes
Date: Wednesday, September 14, 2022 17:37:42

Hello everyone!

Hope you're having a wonderful day, and congratulations on your first ever Board of Governors meeting! You all did amazing, and I can't wait to work with this dynamic group over the course of this year.

[Here](#) is the link to the meeting minutes from yesterday. All important dates and times are bolded, so make sure to look through it to catch up with upcoming action items. Additionally, I want to reiterate that a full list of your CoGo's is due September 17th, but earlier if you can for the sake of external boards.

As always, please feel free to reach out if you have any questions or concerns.

Güzin Karagöz (*she/her/hers*)

University of North Carolina at Chapel Hill | Class of 2025

B.A. Political Science, B.A. Contemporary European Studies & Data Science Minor

Executive Administrative Coordinator | Residence Hall Association

guzin@ad.unc.edu