

IN THE SUPREME COURT

Action No. 12 SSC 002 )  
 GRANT ANASTAS-KING )  
 TAR HEEL RIFLE AND PISTOL CLUB, )  
 JOSHUA ARISTY, )  
 TRAVIS CRAYTON, )  
 PETER McCLELLAND, )  
 PLAINTIFFS )  
 )  
 Versus )  
 )  
 PAIGE COMPARATO, )  
 Speaker of Student Congress )  
 DEFENDANT. )

**COMPLAINT**

---

I. JURISDICTION

The Student Supreme Court has jurisdiction over this matter pursuant to III S.G.C. Section 600 (A), “the jurisdiction of the Student Supreme Court shall extend to controversies concerning actions of the Legislative Branch... extend to questions of law arising under this Constitution, the laws enacted under its authority of actions of the Legislative Branch.”

The Plaintiffs allege that Defendant, the Student Congress, is in violation of II S.G.C. Section 340, requiring the Student Congress to pass and follow the Standing Rules of Student Congress. Specifically, Defendant violated SCR-112-007(B) at its meeting on March 5, 2013, by allowing a motion to previous question to pass with less than two-thirds (2/3) of present and voting members as required.

II. STANDING

Tar Heel Rifle and Pistol Club (THRPC) has standing in this matter pursuant to III S.G.C. Section 611(A), which grants standing to any student or officially recognized student organization whose powers, rights, privileges, benefits, or immunities are adversely affected, restricted, impaired, or diminished by the legislative act in question.

Plaintiff THRPC alleges that as a university organization, the passage of SCB-94-242 would significantly affect their rights and privileges to obtain funding as a student organization, as the passage of the bill would hold their organization to a higher standard than other organizations to obtain funding. Plaintiff further alleges that a violation of the Standing Rules of Student Congress adversely affected their right to speak on the bill before its passage.

Plaintiffs Aristy, Crayton, and McClelland have standing in this matter pursuant to III S.G.C. Section 611(A), which grants standing to any student whose powers, rights, privileges, benefits, or immunities are adversely affected, restricted, impaired, or diminished by the legislative act in question.

Plaintiffs Aristy, Crayton and McClelland allege that their rights to speak as Student Congress members were adversely affected and diminished by the violation of SCR-112-007(B), when the Student Congress voted by majority to vote on SCB-94-242. The Standing Rules of Congress, adopted under the authority granted to Congress by II S.G.C Section 340 require two-thirds of members present and voting to end debate. Plaintiffs Aristy, Crayton, and McClelland further allege that they had shown desire to speak on the bill, but were not allowed to do so due to error of the Student Congress in its ruling to move to vote on the bill.

### III. NECESSARY DEFENDANTS

Pursuant to III S.G.C. Section 707 (B)(1), Paige Comparato, as Speaker of the Student Congress, is the necessary Defendant in this action as this is a suit based on an action of the Student Congress.

### IV. RELIEF

- A) The Student Congress met on March 5, 2013.
- B) SCB-94-242, "A Bill to Have SSSC Hear Ammunition Requests," was placed on the general orders calendar of the Student Congress agenda.
- C) Rep. Austin Root, the primary sponsor of SCB-94-242, presented the legislation to the full Congress. Rep. Daniel Rojas was yielded time to ask questions, yielded his time to Rep. Root, and made a motion to previous question at the conclusion of Rep. Root's remarks.
- D) Rep. Root seconded Rep. Rojas' motion. Consent was called and Rep. Travis Crayton objected. Hearing the objection, Presiding Officer Rep. Connor Brady asked for a vote on the motion.
- E) Rep. Brady ruled that the "no" votes in the room had carried the motion. Rep. Root called division to see the "yes" and "no" votes. Upon counting the "yes" and "no" votes, it was determined that the motion carried by a vote of 17-14 and the Student Congress immediately moved to a roll call vote on SCB-94-242. A vote of 17-14 does not constitute 2/3 of the members of Congress present and voting.
- F) SCB-94-242 passed by a vote of 17-16 after debate was erroneously ended. Plaintiffs allege that this error affected, or could have affected, the overall outcome of the bill in question.

### V. DEMAND FOR JUDGMENT

Plaintiffs respectfully request that the Court rule the vote on a motion to previous question of the Student Congress on March 5, 2013 as invalid, and order Defendant to immediately call a special meeting to hold a new vote on the issue of SCB-94-242.

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



---

Grant Anastas-King  
Plaintiff

540 Paul Hardin Drive, Ram Village 3309  
Chapel Hill, North Carolina 27514  
Skyhawkpilot12@gmail.com  
256-509-1628

Filed this 6<sup>th</sup> day of March, 2013, at 12:30am.



---

Grant Anastas-King, President  
Tar Heel Rifle and Pistol Club  
Plaintiff

540 Paul Hardin Drive, Ram Village 3309  
Chapel Hill, North Carolina 27514  
tarheelrifle@gmail.com  
256-509-1628

Filed this 6<sup>th</sup> day of March, 2013, at 12:30am.



---

Joshua Aristy  
Plaintiff

445 Paul Hardin Drive – Morrison Room 447  
Chapel Hill, North Carolina 27514  
josh.aristy1993@gmail.com  
919-597-1301

Filed this 6<sup>th</sup> day of March, 2013, at 12:30am.

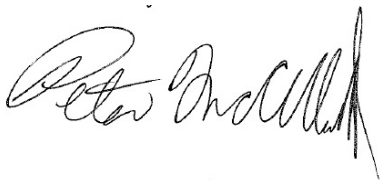


---

Travis Crayton  
Plaintiff

425 Hillsborough Street – Apt 3H  
Chapel Hill, North Carolina 27514  
tjcrayton@gmail.com  
919-408-7324

Filed this 6<sup>th</sup> day of March, 2013, at 12:30am.



---

Peter McClelland  
Plaintiff

301 South Road – Winston Room 321  
Chapel Hill, North Carolina 27514  
hawkswrestler@gmail.com  
704-877-2264

Filed this 6<sup>th</sup> day of March, 2013, at 12:30am.



---

Connor E. Brady  
Counsel of the Plaintiffs

102 Country Club Road, Graham Hall – Room 356  
Chapel Hill, North Carolina 27514  
cebrady92@gmail.com  
336.953.2511