

IN THE SUPREME COURT	)	
	)	
Action No. _____	)	
	)	
Alyson Culin	)	
Member, Project Dinah	)	
	)	
PLAINTIFF	)	
	)	
versus	)	COMPLAINT
	)	
	)	
Tim Nichols	)	
Speaker of Student Congress	)	
	)	
DEFENDANT	)	

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- I.           Jurisdiction.  
The Student Supreme Court retains jurisdiction over this matter on the basis of Title III, Section 401A of the Student Code. Such section provides that the Student Supreme Court shall have authority to adjudicate controversies arising from acts of the legislative branch of Student Government. Plaintiff alleges improper disposition of a funding request before Student Congress.
  
- II.          Standing.  
Plaintiff is a former co-chair and current member in good standing of Project Dinah, an officially recognized student organization, seeking relief from an act of Student Congress. Plaintiff therefore claims standing under Title III, Section 407A.
  
- III.         Necessary Defendants.  
The allegation contained herein is based upon an act of Student Congress. Title III, Section 510B(1) provides that the Speaker of Student Congress may be named as a necessary defendant in such a complaint.
  
- IV.         Relief.  
On the evening of Tuesday, March 3, 2009, Student Congress amended the 2009-2010 Annual Budget (SCB 90-086) to remove a provision awarding funding in the amount of one thousand dollars (\$1,000) to Project Dinah. Such funding was designated for speaker fees to pay for a modest portion of "I Heart Female Orgasm," an educational program regarding sexual health. Following the passage of the amendment to strike all Project Dinah funding, Congress voted to approve the 2009-2010 Annual Budget (SCB 90-086).

Defendant seeks relief from such acts of Student Congress on the following basis:

1. **Violation of Title V, Section 108 of the Student Code.** In discussions to amend the 2009-2010 Annual Budget (SCB 90-086) to remove all funding for Project Dinah, Student Congress repeatedly violated Title V, Section 108 of the Student Code. Such section provides that, “There should be conscientious efforts made by SC to reduce speculation in regards to an organization’s ability to fund-raise or in regards to what effect partial funding of a program might have.” No such efforts were made, despite pervasive speculation by Members of Congress with respect to Project Dinah’s fundraising capability. Members repeatedly stated that Project Dinah should be capable of raising funds to support the event in question, going so far as to note that Project Dinah could “easily” raise funds for an event with such demonstrated popularity. During the course of the discussion, representatives variously suggested that the group could charge an admission fee, hold fundraising events and seek grant money from unspecified outside “groups.” Never once did any member of Congress, including Speaker Nichols, act to discourage such speculation. Congress’ obligation under Section 108 of Title V was never mentioned by the Speaker or any other member.
2. **Improper reliance on “Title V for Dummies,” a non-binding document.** In discussions about removing all funding for Project Dinah from the 2009-2010 Annual Budget (SCB 90-086), Members of Student Congress repeatedly referred to a “rule” against funding for any speakers returning to campus within a four-year period. Quite simply, no such rule exists anywhere in the Student Code or any other official document. The “rule” invoked by members in arguing against funding for Project Dinah is contained in “Title V for Dummies,” a document with no official standing whatsoever (see link below). Section 3.2.1 of “Title V for Dummies” states that, “Request to bring a speaker can be denied if: ... Speaker has appeared at UNC in the past 4 years.” This statement was repeatedly portrayed as a “rule,” despite having absolutely no basis in the Student Code.

“Title V for Dummies” can be viewed at:

[http://congress.unc.edu/wiki/images/Title\\_V\\_for\\_Dummies.pdf](http://congress.unc.edu/wiki/images/Title_V_for_Dummies.pdf)

V. Demand for Judgment.

1. Plaintiff respectfully requests that this Court order a full review of the allegations above. Plaintiff is prepared to submit further evidence in support of the allegations above.
2. Plaintiff respectfully requests a temporary injunction against the enactment of the 2009-2010 Annual Budget (SCB 90-086), pending a full review by this Court of the allegations above.
3. Plaintiff respectfully requests that this Court invalidate Student Congress’ amendment of the 2009-2010 Annual Budget to remove all funding for Project Dinah on the grounds set forth above.

4. Plaintiff respectfully requests that this Court order Student Congress to reconsider such amendment to remove all funding for Project Dinah, and that such reconsideration be properly limited to those Guidelines for Funding provided in Title V, Section 202.

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.

Respectfully submitted,

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PLAINTIFF

Alyson Culin

Member, Project Dinah

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Filed this the 16th day of March, 2009, at \_\_\_\_\_.