

***IN THE STUDENT COURT OF
THE GEORGE WASHINGTON UNIVERSITY***

COMPLAINT

Christian Zidouemba)	
_____)	
)	Plaintiff(s)
_____)	
)	
v.)	
GW Joint Election Commission)	
_____)	
)	Defendant(s)
_____)	

FILED ON THIS 29th DAY OF March, 2023.

I. PARTIES

A. PLAINTIFFS. Please list the full name, email address, and preferred telephone number of each plaintiff, with the **primary plaintiff listed first**. If there are more than four named plaintiffs, please generate as many additional rows as needed or attach to this complaint a separate document containing the full names, email addresses, and preferred telephone numbers of additional plaintiffs.

<u>PRIMARY PLAINTIFF</u>
Name: Christian Zidouemba

Email Address: christianz2014@gwmail.gwu.edu

Telephone Number: +1 (571) 341-0106

B. REPRESENTATIVES FOR THE PLAINTIFFS. If the plaintiffs choose to have representatives prepare this complaint or present their case to the Court, please list the full name, email address, and preferred telephone number for each representative, with the **primary representative listed first**.

<u>PRIMARY REPRESENTATIVE</u> Name: Arjun Singh <hr/> Email Address: arjun.singh@law.gwu.edu <hr/> Telephone Number: +1 (212) 470-8922 <hr/>	<u>PLAINTIFFS' REPRESENTATIVE</u> Name: <hr/> Email Address: <hr/> Telephone Number: <hr/>
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C. DEFENDANTS. Please list the full name and known email address for each defendant, with the **primary defendant listed first**. If there are more than four named defendants, please generate as many additional rows as needed or attach to this complaint a separate document containing the full names and known email addresses of additional defendants.

<u>PRIMARY DEFENDANT</u> Name: The GW Joint Elections Commission (JEC) <hr/> Email Address: jointelectionscommission@gmail.com <hr/>	<u>DEFENDANT</u> Name: Oliver Plavin, in his official capacity as Administrative Commissioner of the GW Joint Elections Commission <hr/> Email Address: jointelectionscommission@gmail.com <hr/>
<u>DEFENDANT</u> Name: Fatima Konte, in her official capacity as Chair of the GW Joint Elections Commission <hr/> Email Address: jointelectionscommission@gmail.com <hr/>	<u>DEFENDANT</u> Name: Tyla Evans, in her official capacity as Chief Investigator of the GW Joint Elections Commission <hr/> Email Address: tevans13@gwmail.gwu.edu <hr/>

<u>DEFENDANT</u> Name: Michael Ubis, in his official capacity as Policy and Finance Commissioner of the GW Joint Elections Commission <hr/> Email Address: jointelectionscommission@gmail.com <hr/>	<u>DEFENDANT</u> Name: Catalina Desouza, in her official capacity as Communications Commissioner of the GW Joint Elections Commission <hr/> Email Address: jointelectionscommission@gmail.com <hr/>
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II. JURISDICTION

The Student Court, as governed by the Constitution of The George Washington University Student Association, is limited in the types of cases it can hear. Please indicate the appropriate type of case the plaintiffs are bringing against the defendants: (**check one**)

☐ This is a case challenging the **constitutionality of any action or deliberate inaction by the Student Association**, its respective parts, or any other subordinate bodies subject to the jurisdiction of the Student Association Constitution (Article XII, Section 4(a)(1) of the Constitution).

☒ This is a case **appealing a decision of the Joint Elections Commission in a Student Association election** (Article XII, Section 4(a)(2) of the Constitution). By checking this option, the plaintiffs **certify that a NOTICE OF APPEAL has been served** on the Joint Elections Commission by email (Rule 42).

☐ This is a case **appealing a decision of the Joint Elections Commission in a Program Board election** that is permitted by the Program Board's constitution (Article XII, Section 4(a)(3) of the Constitution). By checking this option, the plaintiffs **certify that a NOTICE OF APPEAL has been served** on the Joint Elections Commission by email (Rule 42).

☐ This is a case **alleging a funding dispute among or between registered student organizations receiving Student Association monies** (Article XII, Section 4(a)(5) of the Constitution).

☐ This is a case that is **none of the above**, and by checking this option, the plaintiffs **declare their submission to the jurisdiction** of the Student Court **and agreement to be bound by the judgments** of the Student Court (Article XII, Section 4(a)(4) of the Constitution).

III. ELIGIBILITY OF PLAINTIFFS

The Student Court, as governed by the Constitution of The George Washington University Student Association, is also limited by which parties can bring cases before the Court. Please indicate the appropriate descriptions of the plaintiffs to the case: (**check all that apply**)

- _____ The plaintiffs are **Student Association Senators or Executive Officers challenging the constitutionality** of any action or inaction on the part of any Student Association Executive Officer, a majority of the Senate, any Senate Chair, the Joint Elections Commission, or any other subordinate body under the jurisdiction of the Constitution (Article XII, Section 4(a)(1) of the Constitution).
- _____ The plaintiffs are **enrolled students of The George Washington University challenging the constitutionality** of any action or inaction on the part of any Student Association Executive Officer, a majority of the Senate, any Senate Chair, the Joint Elections Commission, or any other subordinate body under the jurisdiction of the Constitution. (Article XII, Section 4(a)(1) of the Constitution).
- X The plaintiffs are **individuals appealing their elimination or exclusion** by the Joint Elections Commission from a Student Association election (Article XII, Section 4(a)(2) of the Constitution).
- _____ The plaintiffs are **individuals appealing fines levied** by the Joint Elections Commission for infractions committed by plaintiffs in a Student Association election (Article XII, Section 4(a)(2) of the Constitution).
- _____ The plaintiffs are **individuals appealing their elimination or exclusion** by the Joint Elections Commission from a Program Board election (Article XII, Section 4(a)(3) of the Constitution).
- _____ The plaintiffs are **individuals appealing fines levied** by the Joint Elections Commission for infractions committed by plaintiffs in a Program Board election (Article XII, Section 4(a)(3) of the Constitution).
- _____ The plaintiffs are **individuals appealing other decisions** of the Joint Elections Commission in a Program Board election, as permitted by the Program Board's constitution and regulations (Article XII, Section 4(a)(3) of the Constitution).
- _____ The plaintiffs are **individuals or groups challenging the constitutionality of a funding decision** of an auxiliary or secondary funding body established by the Student Association (Article XII, Section 4(a)(5) of the Constitution).
- _____ The plaintiffs are **individuals or groups challenging the constitutionality of a funding decision** of the Student Association Senate (Article XII, Section 4(a)(5) of the Constitution).
- _____ The plaintiffs are **individuals or groups bringing a case or controversy not otherwise specifically provided for in the Constitution** and seek to invoke the Student Court's jurisdiction over the case or controversy. **The Student Court will determine if all other parties involved submit to the jurisdiction of the Student Court** and agree to be bound by the judgments of the Student Court before proceeding any further with adjudicating the case or controversy (Article XII, Section 4(a)(4) of the Constitution).

IV. STATEMENT OF DISPUTE, FACTS, & RELIEF

The plaintiffs shall attach to this complaint a document that contains three parts, with the following headers, all of which shall comply with the following instructions and be concise and succinct:

A. STATEMENT OF THE DISPUTE

The statement of the dispute shall be an overall summary of the issues or questions contained in the dispute that need to be decided or answered by the Student Court. The issues or questions can be presented in narrative form, or in bulleted or numbered list; but it generally should not be longer than a paragraph or half a page with double-spaced 12-point Times New Roman (or other easily readable serif font).

B. STATEMENT OF FACTS

The statement of facts shall be a series of numbered paragraphs, with each paragraph containing a relevant fact. The statement of facts may be in general terms, but must constitute sufficient information for the Student Court to discern the nature of the dispute and the issues or questions contained in the dispute that need to be decided or answered by the Student Court.

As such, the statement of facts should contain:

- The names of each and every party (plaintiffs and defendants) to the dispute, which should be the same as the parties named section I of this complaint;
- The role or relationship between each and every party and the dispute;
- The relevant dates to the dispute;
- The nature of the injury or harm suffered by the plaintiffs;
- Each and every injury and harm suffered by the plaintiffs;
- A numbered, paragraph-by-paragraph, concise SUMMARY of the facts surrounding the actions of each and every party with respect to the injury or harm suffered by the plaintiffs in the dispute.

C. STATEMENT OF RELIEF

The statement of relief shall lay out what the plaintiffs seek from the Student Court to address the injury or harm they have suffered in the dispute. Any remedy or relief must be stated specifically enough such that the Student Court can identify which parties must be ordered to comply, what particular actions they need to carry out, and how each and every action addresses the injury or harm suffered by the plaintiffs.

The statement of relief should start with the following clause, appropriately modified for the number of plaintiffs and subject-verb agreement, followed by numbered paragraphs for each specific relief sought: “WHEREAS, the defendants have violated the rights of the plaintiffs and caused substantial injustice to the plaintiffs, the plaintiffs demand judgment against the defendants, and respectfully request that the Court grant such relief.”

Please note that immediate temporary relief (*i.e.*, the Court should issue preliminary measures before hearings and final judgment, per Rule 15), if desired by the plaintiffs, should be indicated separately with a request for preliminary equitable relief (Section VI of this complaint, below). Relief specified in the statement of relief under this section should be final and lasting post-final judgment relief.

v. REQUEST FOR EXPEDITED REVIEW

Leave this section blank if regular Student Court procedures are to be used in this case. If the plaintiffs desire expedited review of this case, the primary plaintiff or representative shall **initial the space below and attach a separate written explanation to this complaint** on why expedited review should be granted. Requesting expedited review does not guarantee the Court will grant such review. The procedures for expedited review, including the Court's considerations, are governed by Rule 37 of the Student Court Rules of Procedure.

 X The plaintiffs believe this case should be granted expedited review, and have attached a separate written explanation stating why expedited review is necessary. The plaintiffs declare that they have read Rule 37, and agree to be bound by the Court's decision in granting or denying expedited review.

VI. REQUEST FOR PRELIMINARY EQUITABLE RELIEF

Leave this section blank if no preliminary equitable relief is desired. If the plaintiffs believe that the Student Court should issue any form of relief prior to the final resolution of the case, such as preliminary injunctions, stays, and restraining orders, the primary plaintiff or representative shall **initial the space below and attach a separate written statement** requesting preliminary equitable relief. The statement must describe the injury or harm suffered by the plaintiffs, the specific preliminary relief sought, and why the Court should issue relief pending a final decision. The procedures for preliminary equitable relief are governed by Rule 15 of the Student Court Rules of Procedure.

 X The plaintiffs believe the Court should grant preliminary equitable relief, and have attached a separate written explanation stating the specific preliminary relief sought and why such relief is necessary. The plaintiffs declare that they have read Rule 15, and agree to be bound by the Court's decisions in granting or denying preliminary equitable relief.

VII. REQUEST FOR CLOSED HEARINGS

Leave this section blank if closed hearings are not desired. Pursuant to Article 37(2) of the Student Court Bylaws, all hearings involving oral participation of the parties are open to the public. If the plaintiffs believe that the Student Court should close all hearings related to this case from public attendance, the primary plaintiff or representative shall **initial the space below and attach a separate written statement** explaining why hearings should be closed. Requesting closed hearings does not guarantee the Court will grant closed hearings.

 The plaintiffs believe the Court should close all hearings related to this case from public attendance, and have attached a separate written explanation stating why

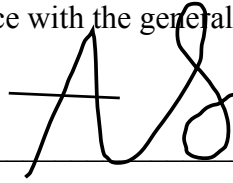
closed hearings are necessary. The plaintiffs declare that they have read Article 37, and agree to be bound by the Court's decision in granting or denying closed hearings.

VIII. ACKNOWLEDGEMENT OF REPRESENTATION

If the plaintiffs have elected to have representatives to prepare this complaint or present this case before the Court, the primary representative as indicated in section I(B) of this complaint shall sign below, acknowledging on behalf of themselves and all other plaintiffs' representatives that:

- they take up the role of representative for the plaintiffs freely;
- they will faithfully present the plaintiffs' case to the best of their ability; and
- they will conduct themselves in accordance with the general principles listed in Rule 46.

Signature of Primary Representative: _____



If the plaintiffs have not elected to have representatives to prepare this complaint or present this case before the Court, the primary plaintiff as indicated in section I(A) of this complaint shall sign below, acknowledging on behalf of themselves and all other plaintiffs that they will conduct themselves in accordance with the general principles listed in Rule 46, they enjoy the right to advice and representation under Article 38 of the Student Court Bylaws, and if they desire representation, they shall let the Court know as soon as possible.

Signature of Primary Plaintiff: _____

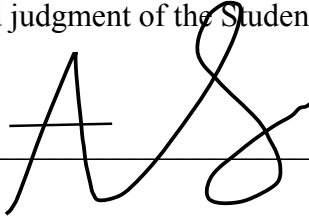
IX. CERTIFICATION SIGNATURE

By signing this complaint below, the primary plaintiff or the primary representative, on behalf of all plaintiffs:

- Certifies that all allegations made in this complaint, including in the statement of the dispute, statement of facts, statement of relief, and any other separate documents or requests attached to this complaint, are true;
- Acknowledges that any misrepresentations with respect to the facts is grounds for immediate dismissal of this case and may incur disciplinary action under Section VII(D) of the University Code of Student Conduct;
- Acknowledges that any and all case proceedings shall be governed by the Student Court Bylaws and Student Court Rules of Procedure, including the general motions practice of Rule 7 and the principles for conduct under Title VI of the Rules of Procedure;
- Acknowledges their right to advice and counsel pursuant to Article 38 of the Student Court Bylaws; and

- Declares their submission to the jurisdiction of the Student Court and agreement to be bound by the decisions and judgment of the Student Court.

Signature: _____



Date: **29 March 2023**

Printed Name: **Arjun Singh**

Primary (circle one)

PLAINTIFF

/

REPRESENTATIVE

Please ensure all parts of this complaint are completely and properly filled out, and all required separate statements and explanations are attached to this document. Failure to do so may result in summary dismissal by the Student Court. All separate statements and explanations should be in 12-point Times New Roman (or other easily readable serif font, see Rule 22(b) for other acceptable fonts) and double-spaced, preferably with the plaintiff's name indicated in the header.

STATEMENTS OF DISPUTE, FACTS, AND RELIEF

I. STATEMENT OF DISPUTE:

We submit to the Court the following questions for review:

1. Whether the GW Joint Elections Commission and its officers Fatima Konte, Oliver Plaivin, Catalina Desouza, Michael Ubis, and Tyla Evans (collectively termed “Defendants”) erred in their finding of ample evidence of probable cause to indict Christian Zidouemba (“Plaintiff”) for an alleged violation of Section 70718 of the JEC Bylaws;
2. Whether the Defendants erred in its decision to find Plaintiff guilty of violating Section 70718, assess “six penalty points” per Section 70806(13), and issue an order disqualifying Plaintiff’s candidacy per Section 70808(a)(1) of the JEC Bylaws;
3. Whether the Defendants violated Plaintiff’s rights to due process and equal protection of the JEC Bylaws, pursuant to the Constitution of the George Washington University Student Association, art. IV, § 2;
4. Whether the Defendants violated Plaintiff’s right to not be denied any right, privilege, position, or status by reason of discrimination on the basis of political belief, pursuant to the Constitution of the George Washington University Student Association, art. IV, § 1(4).

II. STATEMENT OF FACTS:

We affirm the following facts as a true and accurate description of the facts as known:

1. On Friday, March 24, 2023 at 12:52 Hours, the last working day of the week, the GW Joint Elections Commission (“Primary Defendant”) contacted Christian Zidouemba (“Plaintiff”) via email to notify him of a “Violation Hearing.” Defendant, in its email, stated it was indicting Plaintiff under Section 70718 of the JEC Bylaws. Primary Defendant’s email claimed that it had conducted a “probable cause hearing” on the charges against him. Primary Defendant, in their email, stated that it had set Monday, March 27, 2023 at 18:30 Hours as the date and time of the Violation Hearing – less than 96 hours from the transmission of their email. Primary Defendant’s email contained two documents attached. The first document, titled “Formal complaint.pdf,” was dated “22 March 2023” and contained a report from the Primary Defendant’s Chief Investigator, Tyla Evans (also named as a Defendant), stating the following as a Summary:

“Christian Zidouemba has been accused of wrongfully collecting signatures and violating Bylaw 70718. I was told that he collected signatures for candidates Keanu Rowe, Aidan Spencer, and Redzuan Bin Mohamed Raffe. After speaking with both Keanu and Aidan, they were both unaware of Christian collecting signatures for them. The Bylaw in question is attached below:

Section 70718. Impersonation

16 (a) No candidate, or authorized agent thereof, may falsely assume or pretend to be—

- 17 (1) a member of the Commission;
- 18 (2) an officer acting under the authority of the Commission;
- 19 (3) another candidate; or
- 20 (4) any other individual acting under the authority of the Student Association.”

The report from the Chief Investigator did not specify who had told her of the Plaintiff’s alleged collection of signatures or provide any evidence in support of the claim. The report from the Chief Investigator, additionally, did not state whether she had contact with Redzuan Bin Mohamed Raffie, the third candidate whom Plaintiff was alleged to have impersonated.

The second document, titled “Formal Probable cause hearing-3.pdf,” contained a restatement of the email’s text, and listed the number of counts on which Plaintiff was indicted, being six counts. The document was signed by the Primary Defendant’s Chair, Fatima Konte (also named as a Defendant).

Plaintiff here suffered an injury from Defendant’s actions, by being informed of the indictment against him at an unreasonable and inconvenient time, i.e., a Friday afternoon, even though the complaint against him had been prepared on March 22, 2023. Plaintiff also suffered injury, as a consequence of Defendant’s actions, by being required to procure evidence and prepare a defense for himself over a weekend, and within a mere 72 hours of being first notified of the indictment. Plaintiff also appears to have suffered an injury to due process and equal protection, in that the Chief Investigator’s complaint cites hearsay as the basis for her complaint against Plaintiff, arguing “I was

told that he collected signatures...” while neither citing nor providing any material evidence in support of this conclusion, nor identifying any witness who may testify to such conduct.

2. On Saturday, March 25, 2023 at 18:33 Hours, the Primary Defendant contacted Plaintiff, again, via email. This email was sent within 48 hours of the scheduled Violation Hearing, on a scheduled holiday (i.e., Saturday). In their email, the Primary Defendant stated the following, *inter alia*:

“Per Section 707804 of the JEC bylaws, you must submit all evidence in your defense, including a list of expected witnesses, to the Chief Investigator at least twelve (12) hours before the violation hearing. Admissibility of evidence submitted following this deadline will be at the sole discretion of the Elections Commissioner. Similarly, the Chief Investigator will provide you with all evidence they plan to present in your hearing no later than six (6) hours prior to the violation hearing.”

The Primary Defendant’s email did not contain any evidence it planned to present during the hearing. **Plaintiff, here, suffered an injury from Primary Defendant’s actions, by being denied access to the evidence against him in a timely manner, and by being compelled to provide evidence in his favor several hours prior to the same deadline for the Chief Investigator, granting them an unequal and unfair advantage in the production of evidence.**

3. Thereafter, on Saturday March 25, 2023, the Plaintiff contacted the Primary Defendant via email with the following message: “Following up on my email. You

must provide me with all the probable cause and all evidence within the next hours. I will be contacting the Hatchet regarding this matter.”

4. Thereafter, on Sunday, March 26, 2023, the Primary Defendant contacted the Plaintiff via email. The email contained two digital images – titled “2DFAF7C3-2D9A-4595-ACBF-667EB51ED7B5.jpeg” (referred to as Image 1) and “6D6D0B32-1D1A-4144-99C5-BFC6957CEBD8.jpeg” (referred to as Image 2), respectively. Both images were photographs of Petition of Support papers in a format issued by Primary Defendant for the purpose of the 2023 GW Student Association General Election. The Petition papers were in support of Plaintiff’s inclusion on the ballot for the office of “President.” Each photograph depicted one page of a larger set of a Petition of Support, with Image 1 depicting page 13 of 18 and Image 2 depicting page 14 of 18. In Image 2, the blank space for the name of the candidate contained words that had been scratched out with ink pen, on top of which Plaintiff’s name was written with ink pen.
5. On Sunday, March 26, 2023, at 22:21 Hours, Plaintiff contacted Primary Defendant by email to present his formal response to the allegations levelled against him, prior to the hearing. An excerpt of the Plaintiff’s email is as follows:

“I want to emphasize the admission of the JEC Investigator, that 2/3 of the candidates that I allegedly campaigned for, noted that I have not campaigned for them nor were aware of me collecting signatures for them... Moreover, it would be unfair and insulting to the students who have signed my petitions to assume that I have collected signatures for other candidates. I take great pride in the integrity of my signature-

gathering efforts, and I would never falsely claim to have collected signatures for anyone else.

It is laughable, to say the least, that the evidence presented is credible. The first petition presented does not seem to address any specific issue or problem. As for the second petition, it has been explained that my roommate is the reason why a name has been erased.

Moreover, I find it difficult to understand the rationality behind the accusation that I have gathered signatures for another candidate. As a candidate running for the same office, I would have no motive to sabotage my own campaign by collecting signatures for my competitors. It simply doesn't make sense.”

In their email, Plaintiff also named Aiden Spencer and Mohammed Bin Redzuan, two of the candidates that Plaintiff was alleged to have impersonated, as witnesses in favor of Plaintiff. Plaintiff also named “Omar Saadi, Ian Chiang, and Grace Newman as individuals who can verify that I have never collected signatures for political candidates or causes.” Plaintiff included two photographs of text messages exchanged with Grace Newman where the witness wrote “That is strange. I thought we only signed your petition.” Plaintiff, to this email, also attached a document entitled “Stupid Testimony Shit.pdf” written by Ian Ching, in the form of a letter addressed to the Primary Defendant. An excerpt of Ching’s letter is as follows:

“A few weeks ago, I didn’t quite remember the exact date; I found a need to use the shared dining table in the common area of my apartment. Christian Zidouemba who is my roommate, was not at home at the

time. I have informed him numerous times that I would prefer for the common area not to be cluttered with items, especially dirty dishes, candy wrappers, JEC petition forms, and other items that could attract rodents. In my moment of frustration with the Paris level of cleanliness, I wrote in Keanu Rowe within the blank line which reads in part: “We petition for the inclusion of _____ on....”

(I must note for my own defense that I flipped through the signatures list until I found a BLANK Petition paper that did not have signatures yet.) I considered this a harmless prank and did not intend to get Christian DQ’d from the election. Regardless, I’m sure the Hatchet’s reading this and my #hatchetmentions is just going to go up from this incident. I’ll testify that to the best of my knowledge, Christian never had plans to impersonate anyone but worked hard to conceal his intentions to run for President some time in advance.”

6. On Monday, March 26, 2023, the Primary Defendant conducted the Violation Hearing at the School of Media and Public Affairs Room 308. The Chief Investigator called Andrew An, a student who has previously spoken in political opposition to Plaintiff’s Presidency of the Student Association, to testify during the hearing, alleging that he was approached by Plaintiff to sign his Petition of Support and that the pages of said petition did not have Plaintiff’s name on them. An also testified that he asked Plaintiff to sign for Keanu Rowe.
- The Plaintiff called Aiden Spencer, Mohammed Bin Redzuan, and Omar Saadi to testify that, to their knowledge, Plaintiff did not impersonate them or any other

candidate seeking election. Plaintiff also presented written evidence from Ian Ching and Grace Newman (aforementioned in paragraph 5) as evidence in defense of himself. Following the presentation of evidence, the Plaintiff was asked questions by the Primary Defendant's regarding the evidence. Plaintiff was then excused and the Primary Defendant moved into an *in camera* session to deliberate upon the matter.

Plaintiff suffered an injury in the testimony of Andrew An, a copy of whose sworn testimony was not provided to the Plaintiff as evidence enabling a proper cross examination of the witness in a timely manner in advance of the hearing – unlike Plaintiff's provision of written testimony by Ian Ching and Grace Newman in advance of the hearing – thereby depriving Plaintiff of due process.

7. Later that night, on March 26, 2023, after 23:00 Hours, the Primary Defendant contacted Plaintiff via Zoom. Primary Defendant informed Plaintiff that they had found him guilty of impersonating a candidate in violation of Section 70718 of the JEC Bylaws. Primary Defendant then "assessed six penalty points" against Plaintiff citing Section 70806(13) of the same bylaws, and issued an order disqualifying Plaintiff's candidacy per Section 70808(a)(1) of the same bylaws. In an email on March 27, 2023 at 23:24 Hours, the Primary Defendant contacted Plaintiff with an email stating the same. **Plaintiff suffered an injury in the form of an erroneous judgement by the Primary Defendant that he violated Section 70718. At the hearing, no evidence was introduced to support the charge that Plaintiff had impersonated Aiden Spencer or Mohammed Bin Redzuan as specified in Primary Defendant's complaint (see paragraph 1). As well, the testimony of**

Andrew An did not rely upon any material evidence presented during the hearing to support his conclusions about Plaintiff's conduct.

8. Plaintiff submitted their Notice of Appeal of the decision of the Primary Defendant to the Court in an email on Tuesday, March 28, 2023 at 1:08 Hours. Plaintiff's email was also transmitted to Primary Defendant, thereby giving requisite notice.

III. STATEMENT OF RELIEF:

WHEREAS, the defendants have violated the rights of the plaintiffs and caused substantial injustice to the plaintiffs, the plaintiffs demand judgment against the defendants, and respectfully request that the Court grant such relief,

- I. That the decision of the GW Joint Elections Commission disqualifying Christian Zidouemba be reversed by the Court and remanded to the Commission, with instructions to validate all signatures obtained by Christian Zidouemba to certify his Petition of Support meets the requirements of Section 70501(b)(2)(i) of the JEC Bylaws to be validated, and thereupon to register Christian Zidouemba candidate for President in the 2023 General Election of the Student Association;
- II. That, should the GW Joint Elections Commission fail to complete the process of validation and registration of Christian Zidouemba's candidacy within four days (weekends exempted) of the date of its reversal of the Commission's decision, the Court issue a writ of mandamus commanding the Commission to include Christian Zidouemba on the ballot for the General Election of the Student Association for the office of President;

III. That the GW Joint Elections Commission be enjoined by the Court from proceeding with the administration of the 2023 General Election of the Student Association for the office of President until such time as it has completed the process of registration of Christian Zidouemba's candidacy for the office of President.

REQUEST FOR EXPEDITED REVIEW:

A. The Plaintiff requests an expedited review under Rule 37 of the Student Court Rules of Procedure, citing unjust disqualification, which significantly disadvantages him. If not swiftly reinstated, the Plaintiff will be forced into a write-in campaign, negatively impacting his campaign and burdening voters. The Plaintiff urges the Court to grant expedited review and preliminary equitable relief, as harm to the campaign increases over time.

REQUEST FOR PRELIMINARY EQUITABLE RELIEF:

B. The Plaintiff seeks preliminary equitable relief under Rule 15 of the Student Court Rules of Procedure due to unjust disqualification, which significantly disadvantages him one week before the election. Prompt reinstatement is essential for the Plaintiff to present his platform and fairly compete with a crowded field of candidates. The ongoing harm to the Plaintiff's candidacy requires urgent redress to prevent further damage to his campaign. The Plaintiff requests that the Court grant preliminary equitable relief, including reinstatement of his candidacy, enabling appearance on the election ballot.