IN THE CENTRAL STUDENT JUDICIARY

JORDAN SCHULER,  
Plaintiff,  
v.  
TYLER ZIEL,  
Defendant.

BRIEF AMICUS CURIAE OF COLLEGE OF THE EXECUTIVE BODY OF THE LITERATURE, SCIENCE, AND THE ARTS’ STUDENT GOVERNMENT IN SUPPORT OF PLAINTIFF

IDENTITY AND INTEREST OF AMICUS CURIAE

Pursuant to the Central Student Judiciary Manual of Procedure §51.45, the Executive Board of Student Government of the College of Literature, Science, and the Arts ("LSA SG Exec"), respectfully submit this brief amicus curiae in support of Plaintiff Jordan Schuler* and Preetha Pamidighantam.

LSA SG Exec is comprised of 8 total members.

Brian Wang (he/him/his) is the current President of LSA SG and graduating fourth-year student. He has been in LSA SG for four years, became a member of the Executive Board in April of 2018, and was elected President in the LSA SG March Elections of Winter 2019.

Mary McKillop (she/her/hers) is the current Vice President of LSA SG and is a third-year student. She has been in LSA SG for three years, serving for three semesters as the Internal Review Committee Vice-Chair and two semesters as the Appointments Committee Chair. The Internal Review Committee is responsible for maintaining and interpreting the bylaws** and constitution for the Government. She was elected Vice President in the LSA SG March Elections of Winter 2019.

Kaitlyn Colyer (she/her/hers) is the current Treasurer and a second-year student. She has been in LSA SG for two years. She has held an Appointed Representative position in Fall 2018, and won an Elected Representative Seat in Fall 2019. She was concurrently appointed to Treasurer in Fall 2019.

Nicholas (Nick) Bonde (he/him/his) is the current Counsel and a fourth-year student. He has been a member of LSA Student Government for four years. He won an Elected Representative seat in Winter 2019 and served as Internal Review Committee Vice-Chair. Nick was appointed to Secretary in Fall 2018. In Fall 2019, Nick was appointed to Counsel and is currently the Chair of the Internal Review Committee.
Kevan Casson (she/her/hers) is the current External Relations Officer and a graduating fourth-year student. She began her involvement in LSA Student Government in Fall 2016, won an Elected Representative seat to LSA SG, and again in Fall 2017. She was appointed to her current position as External Relations Officer in Fall 2018.

Gurliv Chahal (she/her/hers) is the current Student Life Relations Officer and a graduating third-year student. She has been involved in LSA SG for three years. In Fall 2017, she earned a seat as an Appointed Representative, and won an Elected Representative seat in Winter 2018. She was appointed to Student Life Relations Officer in Winter 2019.

Nicolas Pereira (he/him/his) is the Secretary, a current third-year undergraduate student. He has been in LSA SG for 2 years, previously serving as an Elected Representative and became a member of the LSA SG Executive Board in Winter 2019.

The above 7 members of LSA SG Exec write this brief in the interest of maintaining the integrity of its elections process and to voice their concern of the overarching and unsolicited decisions made by the Defendants.

*One of the Plaintiffs, Jordan Schuler, is a member of the LSA SG Executive Body as Academic Relations Officer. He, or either plaintiffs, were not a part of any conversations pertaining to the election between LSA SG Exec and the Defendants during or after the elections cycle. Neither participated in any of the interpretations of the election cycle that have been made in this brief. Reference to “LSA SG Exec” does not include Jordan Schuler, unless stated otherwise.

Summary of Argument

In the combined 22 years of LSA SG involvement and 15 total external elections that the members of LSA SG Exec have participated in, the Defendants have erred in their judgement in a critical time period. There were many steps along the way for the Defendants to provide reasonable judgement and ask for counsel on conflicting decisions provided by LSA SG and its Executive Board. Instead, the LSA SG Executive Board has officially received the Demerit Explanation for Candidates and is unanimously discontent with the inconsistency of concrete arguments and conflicting information laid out in the report. We find that the decisions made are unclear and set a heavily conflicting precedent for participants, future candidates, and representatives in this organization. Any reasonable review of even the previous two Executive Ticket Reports (Winter 2019 and Winter 2020) would find it hard to compare issues and the magnitude of the demerit(s). The arguments made will be; first, the lack of consistency between candidates and non-candidates that set a double standard, and second, ignorance to relevant guidelines have contradicted the standards set by the Defendants.
REASONS FOR FINDING IN FAVOR OF THE PLAINTIFF

1

THE DEFENDANTS DID NOT HAVE TOTAL AUTONOMY IN ELECTION CONFLICTS

The Defendants were employed by the governing body of LSA SG by unanimous decisions on February 26th and sent contracts from LSA SG Exec, including Plaintiff Schuler, on February 28th to be Election Director and Deputy Election Director.¹ Under contract, the Defendants were made clear that the election was to occur on April 1st and 2nd, 2020. Throughout the election process of the Winter 2020, most standards of candidate briefing were met. The Defendants were given all the material needed to meet the baseline requirement of their employment in disseminating the election to the constituent body of the College of Literature, Science, and the Arts (“LSA”) and to officiate procedural norms of candidate duties and responsibilities during orientation in the Candidates Meeting.

The issue then stems from the lack of communication and improper interpretations that the Defendants ruled on in cases of last-minute and rushed demerit decisions towards candidates, especially during the Voting Period (as defined in 19.03.06, 19.07.00-02). Within this 48-hour timeframe (April 1st 12:00 am to April 2nd 11:59 pm), we understand the complications that arise within such a short window to issue thoughtful and accurate depictions of the bylaws and contract the candidates’ sign when declaring their candidacy. However, many of the rulings from violations that were reported within this window are subject to harsh criticism as they appear incredulous and inconsistent.

A. Defendants Bylaw Interpretation Inconsistency Harms More than Candidates

I. Defendants Use of Harsh and Improper Violation Reporting on Non-Candidate

Much of the governing and individual power allocated to the Election Director and Deputy Election Director is outlined in the LSA SG bylaw Chapter 19 (the Defendants utilized the old copy, referencing Chapter 19 as Chapter 18).²

In the document, Demerit Explanation for Candidates³, of the official violations sent to candidates and non-candidates that incurred a demerit, a non-candidate and member of this

¹ 3/26 General Meeting notes (shortened to include the appointment and hiring of the Defendants)
² Reference to the bylaws and its specific chapters have been subject to change due to an addition of a chapter that occurred after the hiring of the Defendants as Election Director and Deputy Election Director. This has shifted and renumbered chapters but has not affected the wording, definition, or duties of election procedures with the exception of [19.08.08-19.08.11]
³ Attached reference document. Referred to as its title, “demerit violation report”, “the report”. This document has not been edited or marked. It is the exact documentation the sg.exec@umich.edu listserv (Official email for LSA SG Exec) received after the Voting Period concluded from the Defendants.
brief, Counsel Nicholas Bonde (referred to as “Nick” in the document) was issued 3 demerits under Bylaw chapters “18.00.03 (b) and 18.07.00” [now 19.00.03 (b) and 19.07.00] within the Voting Period time frame (April 2nd at 11:22am). The argument here is not against the violation, but under the issuing of punishment for the violation.

As the election code of chapter 19 allows for violations to be issued against non-candidates, we understand the ruling on this case. However, the resulting punishment should have not been demerits as demerits do not affect non-candidates in the election at hand. Specifically, the Defendants should have been aware of 19.08.08 Penalties for Non-candidates:

“Any violator of this election code who is not a candidate shall be subject to, but not limited to, one or more of the following: disqualification from holding any future offices in LSA SG, from holding voting positions within LSA SG, from holding a Chair or Vice-Chair position in a committee, holding a position on the LSA SG Executive Board, a ban from LSA SG in increments of full semesters, as determined by the Election Director or the CSJ.”

In this case, LSA SG Exec is confused on the purpose of issuing demerits for the violation instead of any of the punishments listed above in 19.08.08.

II. Defendants Conflicting Nature of Reasoning and Explanation

In the document, Demerit Explanation for Candidates, there seems to be two versions of “Major violation of 18.07.01 Government Promotion” (pg. 22-25 of this brief) with similar wording but differing sentiments and rulings between the two for the Bazzi and Walker Campaign. In report 1, it lists 6 total demerits. In 2, it lists 2.

1. Election Director's Decision if Demerit: Yes, each instance constitutes a 3 point major violation per 18.08.02 (b). Thus totalling to 6 points.

2. Election Director's Decision if Demerit: Yes, each instance constitutes a 1 point minor violation per 18.08.06. Thus totalling to 2 points.

In the understanding of LSA SG Exec, there seems to be two drafts of the ruling, found in the attached resources, that have been authored. The two imply drastically different consequences to the Bazzi and Walker Campaign. In the latter demerit violation report (2.), we are given the following reasoning.

However, it is the opinion of the Election Director that under 18.08.06 (19.08.06)-Extenuating Circumstances, these violations are reduced from a major violation to a minor violation. 18.08.06 states: “If an offense is listed under a specific category for Section 18.08.01-03 (19.08.01-.03), the Election Director may treat a violation as one that is from a less severe category if there are other circumstances that cause them to believe it should be punished less harshly.” The reasoning of this is due to the understanding
of other cases of campaigning during voting period, in *implicit campaigning vs explicit campaigning*.

In this secondary report of the same incidence, the additional clauses relax the punishments citing (now) 19.08.05 and 19.08.06 as a “catch all” for interpreting the bylaws in the Defendant's own manner.

19.08.05 **Interpreting procedures.** In interpreting these procedures, it shall be the policy of LSA SG to encourage the active and free dissemination of materials relating to LSA SG and that all rules shall be construed liberally in favor of free and open communication and debate. The purpose of the rules and regulations regarding student government elections is not to be used as a method to remove candidates from election, but rather to protect the integrity of the election process.

19.08.06. **Extenuating Circumstances.** If an offense is listed under a specific category for Section 19.08.01-03, the Election Director may treat a violation as one that is from a less severe category if there are other circumstances that cause them to believe it should be punished less harshly. The Election Director may not, however, treat a violation from a less serious category as one from a more serious category.

The Defendants emphasize their definitions of implicit and explicit campaigning, stating that there is a difference between “directly stating” and “implying” to vote for a candidate. Yet, there is no mention of definitions of “implicit” and “explicit” campaigning within the LSA SG Bylaws. So, we infer that the use of 19.08.06 was used to help define it in this instance. However, regardless of the definitions, preceding either section of these bylaws (19.08.05 and 19.08.06), are the specific rules on Voting Period Violations (within the timeline of these reported violations.

**Voting Period Rules**

19.07.00 **Termination of Campaign period.** At 11:59 PM on the night before the voting period begins, all campaigning shall be terminated. This subsection applies to and includes but is not limited to verbal communication, social networking, texting, email messages, and canvassing in which a candidate promotes, or asks others to promote, their candidacy.

19.07.01 **Government promotion.** Candidates may disseminate an approved LSA SG election message sent directly from the Election Director using social networking. **Media messages created by candidates may encourage voting in the election but may not mention any particular candidates.**

19.07.02 **Speaking.** Every candidate may speak on behalf of the election or answer questions about whether or not a student is running in the election when prompted during the voting period. The candidate may not promote their own candidacy when answering questions pertaining to the election.

In both editions of the demerit violation report on this instance (pg. 22-25 of this brief), the authors even cite this as the preceding reasoning for finding a violation in the first place.
Reasoning: The two screenshots are being treated as two separate pieces of campaign material per 18.08.04 (19.08.04)-Exclusivity of Campaign Rules, as each screenshot are separate campaign materials. Therefore both instances are subject to demerits. The reasoning for both instances are the same seeing as the medium was the same (Groupme) as well as the message sent in each. 18.07.01 (19.07.01) allows candidates to promote an “approved LSA SG election message” in addition to “media messages created by candidates [to] encourage voting in the election but may not mention any particular candidates.” Even though Selena is shown promoting the voting website and voting in the election, she additionally mentions herself as a presidential candidate.

It is then confusing to LSA SG Exec why the Defendants would refer to a latter section of the bylaws when the aforementioned 19.07.00-.02 clearly outline the guidelines for viewing this as a major violation (19.08.02 b. Campaigning during the voting period). LSA SG Exec views the secondary report that mentions the clauses for interpreting the differences to “implicit” and “explicit” campaigning as a senseless attempt to argue for leniency that undermines preceding clauses of the Bylaws. The secondary report ends with this clause.

To issue a major violation demerit for this would be too draconian for the degree of the violation, in the opinion of the Election Director. All candidates agreed to follow the Election Code and not to campaign, and this being more explicitly implicit campaigning and a direct violation of 18.07.01 should receive demerits, but not to the level of a major violation.

It is the view of LSA SG Exec that the “opinion of the Election Director” seeing their judgement as “too draconian”, and therefore affecting the integrity of the election with their judgement, is not a luxury they can rely on in their employment to LSA SG. Relying on personal definitions and interpretations of the procedural nature of our operation bylaws takes a heavy toll and creates an extremely dangerous precedent for future elections. It seems clear to LSA SG Exec that the Defendants were comfortable with identifying this issue as Major Violation, however, the sudden change in tone, especially to this degree, is one that LSA SG Exec is not comfortable with.

When faced with tough decisions, the Elections Directors, broadly, are offered to seek counsel with LSA SG Exec, in addition to CSJ.

18.02.01 Questions of Election Code Conflict. In all cases of doubt about any conflict, the burden of responsibility to conform to the code shall rest upon the candidate or group of candidates in question. The Election Director, the LSA SG Executive Board, and CSJ reserve the right to interpret these rules. Failure to consult the Election Director, ignorance, or misinterpretation of this code is not a valid defense of a violation.

Regardless of a rushed or tough decision, if the Defendants did not wish soley abide by a “draconian” ruling, they could have relied on the counsel of their appointed body, LSA SG Exec, or CSJ. As far as LSA SG Exec is aware, the Defendants did not pursue conjunction for
assistance from us, and did not receive official interpretation assistance from CSJ to be made clear and available in the report. While it does give the Defendants the ability to interpret, in times of doubt or conflict, as illustrated by the report itself, the Defendants are not the sole arbiters in altering the responsibility of the charged campaign in the manner that they did.

Between Section A I. and A II. of this brief, the differing tones in issued violations to candidate and non-candidate rears an ugly double standard. If a non-candidate is found guilty of a Voting Period violation by the Defendants, regardless of their role in LSA SG, why would that violation garner a harsher degree of punishment? The standard of the Election code is on the burden of the Candidates. While there are clauses that try to prevent non-candidate interference, the lack of mention to 19.08.05 Interpreting procedures or 19.08.06 Extenuating Circumstances is troubling to those not directly involved in the process.

B. Dismissal of Previous Election Conflict and Guidance sets a Dangerous Precedent

I. LSA SG Election Director Extenuating Circumstance Authority Precedent

In the hiring of an independent and unbiased party for the intent of managing and operating our semester Elections, it is usually the role of the LSA SG Executive Board to support the Election Director(s) in material and contacts to ensure a successful election. This year was no different at its start. At the time of the hire, February 26th, the Defendants were given a Google Folder with material used in the last election cycle (Fall 2019) and material from the last contested Executive Ticket election (Winter 2019). The copy of materials included, but were not limited to, previous candidates meeting procedures and orientation slideshow, copies of previous contracts for declaration of candidacy, and a copy of the Winter 2019 Election Directors report that included demerit decisions and explanations in their entirety.

LSA SG Exec recognized and approved a list of changes to the format of election given the situation of the University moving classes to an online format, shown below.4

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4 New Election Plan, sent March 11th by the Defendants for LSA SG Exec.
Nowhere was there listed a proposal on interpreting differential intent or situational changes to any campaign procedures. It was under LSA SG Exec's understanding that the operating procedures would maintain the same as the time of hiring. Given the change in circumstances of physical duties, such as the Candidates Meeting and Candidates Forum, under employment, they were still required to issue the same and consistent judgement for all other procedures. The movement to a more digital atmosphere should not have altered the way material and rules were presented to the candidates. Any changes should have been made apparent to LSA SG, LSA SG Exec, and the candidates. The fact that the Defendants still ruled the violation on Campaigning During the Voting Period signifies, to LSA SG Exec, that there were no changes to expectations made before or during the Voting Period.

While not required definitionally by the Bylaw to strictly follow past precedent from previous LSA SG Election rulings, there were cases that the Election Director and Deputy stressed to bring up in their demerit decisions. However, none of these reflected LSA SG specific cases, nor were any from the material provided to them by LSA SG Exec.

In fact, the Demerit Explanation for Candidates relies on “Central Judiciary Case of Parikh v UEC” as focus of their argument in the issuing of demerits to the Plaintiffs in a decision not specific to this case. Yet there is no explicit or written evidence that the Defendants referred to previous LSA SG elections results and reports in determination of their decisions.
The defendants were offered the W19 Election Director Report, as reference in decision making for all procedures, including but not limited to, candidates forum, executive ticket debate, advertising for the election, and more. The Defendants could have referred to “Addressing Election Violations” in guidance and consideration for their demerits. Included in this were the explanations for the decisions made, and logic of, the former LSA SG Counsel, President, and the Election Director at the time (Winter 2019), Nicholas Fadanelli, and Deputy Election Director, Nicholas Martire, and how they utilized 18.08.06 (now 19.08.06) in reference to a non-candidate (campaign manager) being directly involved in an egregious violation.

With regards to the Brian Wang and Mary McKillop campaign, under 18.08.06 (below), Nick and I have the ability to be lenient and punish this offense more lightly towards the Brian Wang and Mary McKillop campaign in light of it being their campaign manager, John Cipriano, who sent the email to the listserve.

18.08.06. (19.08.06) Extenuating Circumstances. If an offense is listed under a specific category for Section 18.08.01-03, the Election Director may treat a violation as one that is from a less severe category if there are other circumstances that cause them to believe it should be punished less harshly. The Election Director may not, however, treat a violation from a less serious category as one from a more serious category.

Although Brian and Mary are both responsible to some degree for educating their campaign members of the election rules, and making sure they follow them - it is difficult for us to warrant disqualifying this ticket over a member of their campaign committing an egregious violation. However, due to the possible impact on the election we cannot let this offense go entirely unpunished by the campaign as a whole.

For that reason Nick and have decided that the Brian Wang and Mary McKillop shall be issued three (3) demerits instead of four (4) for this offense of the election code - on the condition that they ensure that John Cipriano be removed from all his official and unofficial capacities on their campaign.

The burden of proof was submitted by the party themselves, and indicated the intent was an honest mistake. The extenuating circumstance, in this case, is a violation charged to the campaign and non-candidate, but underneath the actions of a non-candidate. The implied effect was “the possible impact on the election”, and a following punishment to the party was ruled. This was to place partial responsibility for the violations to the party, by an action not clearly committed by the party. If this was instead committed by the party, it would signify a clear violation of 19.06.09 and 19.08.03, and would have warranted the full punishment.

19.06.09 Proper Use of Email Privileges. A candidate can only send emails to email groups that are owned by the candidate as defined by “mcommunity.umich.edu.” and are created expressly for campaign purposes, during the current election cycle. The email group name must clearly indicate that it is a campaign related email group. Candidates

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5 Copy of Report made available by this link.
and campaign volunteers are prohibited from harvesting student email addresses for campaign purposes.

19.08.03 Egregious Violations. Candidates will receive four demerits for each Egregious Violation. Egregious violations shall constitute the following:
(a) Preventing An Eligible Voter From Voting In Any Manner
(b) Bribery. No candidate may promise or offer compensation, monetary or otherwise, in exchange for vote(s). Campaign pledges shall not constitute violations of this rule. The distribution of campaign material to voters shall not constitute a violation of this rule
(c) Violation of Section 19.06.09 with email listservs containing more than 400 members

The use of extenuating circumstances in this case was to identify the degree of responsibility that the party and its campaign manager (non-candidate) had in this violation. The burden was placed significantly on the non-candidate, and partially shared with the party, as the actions were identified to have been primarily from the non-candidate.

The use of extenuating circumstances in the Defendants case was used to squander a violation that was clearly committed by the party, not a non-candidate. If a non-candidate had performed the violation for the party, there could be an argument to seek leniency in a similar way that the Defendants ruled. However, it is the opinion of LSA SG Exec that because the violation was committed by the party and not a non-candidate, the Defendants did not have proper grounds to rule a more lenient punishment under 19.08.05 Interpreting procedures or 19.08.06 Extenuating Circumstances. The burden was proven to be under the candidates. Leniency should only be considered if the candidates had no control over the resulting actions and possible effect. This was not the case with the Defendant’s decision. The Defendants instead applied leniency to mitigate a large, well-defined violation, which is not the intended use of the clause of 19.08.05 and 19.08.06 as integrity is compromised.

II. LSA Election Directors’ Use of Approved, Preceding Material

It is the opinion of LSA SG Exec that even though the Defendants were able to source their decisions on a previous measure, the use of reference to material provided to both them and the candidates in their decisions are, again, out of line.

To their report in Demerit Explanation for Candidates, once again, the Defendants lay out the instances where the charged party would have been informed beforehand of their distinct violation.

18.07.01 allows candidates to promote an “approved LSA SG election message” in addition to “media messages created by candidates [to] encourage voting in the election but may not mention any particular candidates.” Even though Selena is shown promoting the voting website and voting in the election, she additionally mentions herself as a presidential candidate.
We see 18.07.01 necessary so as to promote voting overall in the election rather than for any individual candidate during the voting period. Additionally this was reiterated in an email sent by Natalie on Monday March 20th* at 2:59PM (est). It was written as follows: “Campaigning ends tonight at 11:59pm (est), which means that after that time you may not tell anyone to vote for you explicitly. You can tell them to vote at vote.umich.edu and say that you are running if they ask sometime between March 31st and April 2nd.” However, Natalie had made a mistake writing that the campaign period ended that night, when it really would end on the 31st. So she sent a follow-up email at 3:09pm (est) that same day correcting the mistake.

Given that there was a fair warning in the email prior to the voting period, and the fact that all candidates signed a contract waiving their ability to promote themselves during the voting period for the benefit of all involved in the election, we believe that Selena has violated the contract she signed and committed an act of disservice to the elections process. Under this, Selena would be found of a major campaign violation per 18.08.02 (b): “campaigning during the voting period.”

*The date mentioned in this report is incorrect, as email receipts show the email was sent on March 30th.

In the written report, the Defendants mention 2 specific instances of warnings to the parties; the email sent on March 30th, and the contract “waiving their ability to promote themselves during the voting period”.

In addition, to those two, the Defendants also presented at the mandatory Candidates Meeting to orient potential candidates and parties on rules and regulations. The slide below was specifically added to address Voting Period procedures.  

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6 Link to Presentation

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Voting Period Rules

- Cannot “campaign” but can tell people to vote in the LSA SG Elections (just not for whom)
- If asked – can tell people they are running in the elections during voting period – but cannot encourage them to vote for you
- You cannot block an eligible voter from voting or bribe an individual to vote for you
To LSA SG Exec, there is no evidence of conflicting information that would have led to either the Defendants or the charged party to misinterpret the rules. By the definitions provided by the Defendants on "implicit" and "explicit" campaigning, their rulings seem to be solely independent from the rules they themselves were given to follow, as well the rules given to the candidates, and are contrasting interpretations to the experiences the LSA SG Executive Board has shared in similar situations.

It is a consensus from the 7 members on this brief that the specific violation that the Bazzi and Walker committed would have warranted the full demerit count of the violation at 6 demerits.

Conclusion

For the reasons stated above, the Central Student Judiciary should find in favor of the Plaintiff.

Date April 23, 2020

Respectfully Submitted

Brian Wang, President
Mary McKillop, Vice-President
Kaitlyn Colyer, Treasurer
Nicholas Bonde, Counsel
Kevan Casson, External Relations Officer
Gurliv Chahal, Student Life Relations Officer
Nicolas Pereira, Secretary
Footnote 1

LSA Student Government Meeting Minutes from February 26th

Edited to only include the appointment and hiring of the Defendants
LSA SG General Meeting
February 26th, 2020

I. Call to Order

II. Opening Roll Call
   a. Mary McKillop
   b. Kaitlyn Colyer
   c. Nick Bonde
   d. Jordan Schuler
   e. Kevan Casson
   f. Gurliv Chahal
   g. Nicolas Pereira
   h. Riya Gupta
   i. Tim Dalrymple
   j. Anna Colvin
   k. Claudia McLean
   l. Riley List
   m. Adam Grimes
   n. Gabby Torres
   o. Sai Pamidighantam
   p. Alli Goodsell
   q. Kathryn McCaughey
   r. Divya Manikandan
   s. Jacob Cohen
   t. Josephine Fonger
   u. Caroline Theuerkauf
   v. Erica Nelson
   w. Sungmin Cho
   x. Emilia O’Brien
   y. Joseph Meade
   z. Prahar Dave

III. Announcements

IV. Approval of Agenda
   a. Grimes
      - Colyer - Objection: move appointment of elections director to right before guest speaker
         1. Casson
         2. Grimes withdraws
   b. Grimes
      - Gupta

V. Approval of Previous Minutes
   a. Grimes
      - Gupta
VI. Constituents Time
   a. *What are your plans for spring break?*

VII. Appointments, Elections, & Nominations
    a. Tyler Ziel for Elections Director for Winter 2020
    b. Natalie Suh for Deputy Elections Director for Winter 2020
      - Suh: a few reminders the deadline to run is the Wednesday we get back from spring break
      - Ziel: filing deadline watch for that! There is a form online that you can fill out or there is a paper form
      - Suh: if you are planning on running for president or vice president you do not have to file individually
      - Ziel: I am in administration on ben Gerstein, if you have an issue with a member of CSG overseeing LSA SG
      - McKillop: any LSA student could run, if you ran last winter you should definitely file to run. It is a great experience and if you have any questions please let any of us know and we would be happy to help.
    c. Motion to approve: Colvin

Goodsell
Footnote 2

Demerit Explanation for Candidates

As shared on April 4th, 8:22 pm by the Defendants
Hello all,

If you are receiving this email, it is because there have been election code violations filed against you. We are in the processes of finalizing the demerits. You will receive the final reasonings and demerit counts tomorrow. After you receive those results you will have 12 hours to submit in writing to the Election Director intent to appeal to CSJ the decision of the Election Directors. We are sending this as a courtesy to give you a heads up that you should be prepared to look over the demerits given and the reasoning to decide if you wish to appeal. Our intent is not to blindside you with demerits, as it has been an arduous process determining demerits. Additionally, you will receive updated certified unofficial election results after demerit reasonings are sent out, so please look out for our emails tomorrow.

Best,
Tyler and Natalie

Hello Nick,

You are receiving this email due to a violation brought forth to Tyler and I during the voting period. You posted on Facebook endorsing the Schuler and Pamidighantam presidential ticket during the voting period which we found to be in violation through sections 18.00.03 (b) and 18.07.00 of the LSA Student Government Bylaws. Therefore by section 18.08.02, we have interpreted your post as a major violation resulting in 3 demerits. Below will lie a comprehensive explanation.

Explanation of Violation:
We believe we have the ability to issue this demerit per 18.00.03 Jurisdiction (b) as it states that the election code shall apply to “all individuals that support candidates in the LSA SG elections.” Additionally, you being a member of LSA SG as Counsel further binds you to the bylaws.

This violation is being treated as a Voting Period violation since you posted an endorsement for the Schuler and Pamidigantam presidential ticket on April 2nd at 11:22am. Per 18.07.00 all campaigning was supposed to be terminated at “11:59 PM on the night before the voting period.” Moreover, your Facebook post falls under the category of “social networking” under this same clause.

This violation is a Major Violation per 18.08.02-Major Violations, as campaigning during the voting period falls under this category in section (b) of the clause. Since “candidates will receive three demerits for each Major Violation,” you will be receiving 3 demerits.
Additionally, we see your post as a conflict of interest that could interfere with your ability to certify the election results and therefore will be asking the Treasurer to certify the results instead per 18.04.06.-Certification.

If you would like to appeal this decision per 18.08.11 Internal Appeals Process for Non-Candidates “Any demerit(s) and/or punishment(s) issued to non-candidates may be appealed to the LSA SG Executive Board, with all conflicted parties on the Executive Board recusing themselves.” You also have the option to appeal to CSJ per 18.08.07 Charges of Violation since “all demerits can be appealed to the LSA SG Executive Board or CSJ.”

Please let us know if you have any questions or concerns about our decision.

Best,
Natalie and Tyler
Selena and Josiah

Hello Selena and Josiah,

This email is an official notification of the final demerits tally on Election Code Violations brought forth to Natalie and I. Immediately below is the demerit count found in the Campaign Period, Voting Period, and the total demerits total. The reasoning for the splitting of demerits per period is due to the fact that the appeal process is different in Campaign Period than in Voting Period. Further Below is the explanations of the violations brought forth and explanations on whether or not a demerit was given. Finally, the last section is what you can do to appeal the decision on the demerits if you believe them in violation of LSA SG Bylaws, LSA SG Constitution, or the All-Campus Constitution.

**Campaign Period Demerit Points:** 1  
**Voting Period Demerit Points:** xxx  
**Total Demerit Points:** xxx +1

**Explanation of Violation During Campaign Period**

Minor violation of 18.02.06 Candidate Attendance.

**Time of Decision:** March 31, 2020 1:23PM

**Background:** Due to unforeseen circumstances of Covid-19, we decided to use the LSA Student Government website as an online platform for the forum rather than the in-person format used in previous years. All candidates for President and Vice-President were required to complete a document of questions compiled from the General Body in addition to recording videos of themselves answering the questions. The original due date for these materials was set as March
20th so as to give those with website access enough time to upload the materials for all of the Elected Representative, Presidential, and Vice-Presidential candidates.

Since we did not and do not have website access, we were not able to upload any of the materials ourselves. However, both Presidential tickets asked for extensions, which we granted to both in an email sent by Tyler on Friday March 20th at 12:38AM. The deadline was then pushed to March 21st at 11:59. In this email we also gave the option to eliminate the video response requirement to alleviate any unnecessary burden due to the Covid-19 situation. On Sunday March 22nd at 12:02am, Tyler received a document with videos hyperlinked for each question; however, we could not get any of the videos to open. Additionally, we did not receive any of the required written answers.

Therefore, Tyler reached out to Selena Monday March 23rd at 5:20pm to try and come to a solution but never received a response back. Then Natalie emailed both Selena and Josiah on two separate occasions (Tuesday March 24 at 11:56PM and Thursday March 26 at 4:22PM) to try and come to a solution but also did not receive a response back. On Tuesday March 31st at 12:00pm, Selena emailed us a combined ticket response for the Candidates Forum. Thus being 10 days after the extended deadline and the day before the voting period. Later that day, Natalie received an email from Josiah in response to a reminder email sent out to all candidates inquiring about why the platform was not uploaded. After Natalie briefed Tyler on the email, we collectively decided to issue a demerit.

**Election Director’s Decision if Demerit:** Yes, it constitutes as a 1 point minor violation, per 18.08.01 (a).

**Reasoning:** 18.02.06 clearly states that “failure to attend a LSA SG General Meeting, Candidates Meeting or the Candidates Forum will be considered a minor violation and result in a candidate receiving one demerit.” In this situation, attendance was construed as completing responses to the questions posed in written or video format by the deadline of March 21st 11:59PM, so that there would be enough time to upload the materials for constituents to see. Furthermore, it is our belief that we were extremely flexible with extensions and compromises for the forum in addition to communicating to the best of our ability with you both. Especially given that all other candidates were able to work and communicate with us within the given timeframe. Therefore, it is a violation of 18.02.06 which results in one demerit.

**Violation of 18.06.09 Proper Use of Email Privileges**

**Time of Decision:** April 1st, 2020 at 7:20pm (est)

**Background:** We received a report of a potential violation on Wednesday April 1st at 12:25am. There were two separate screenshots submitted showing Selena posting in the University of Michigan Class of 2021 Facebook group on March 31st at 11:59PM just before the voting period began.
Election Director’s Decision if Demerit: No, it does not yield a demerit.

Reasoning: 18.06.09 explicitly deals with emails as defined by “mcommunity.umich.edu.” Since the group is not explicitly shown to be composed of members with “mcommunity.umich.edu.” emails we cannot consider the group to be equal to a listserv.

Explanation of Violations During Voting Period

Violation of 18.07.00-Termination of Campaign Period & 18.07.01-Government Promotion

Time of Decision: April 3rd, 2020, at 8:26pm (est)

Background: On April 2nd, 2020, at 7:30pm (est), a student brought forth an Election Code violation to Election Director Tyler Ziel about potential campaigning by Selena Bazzi and Josiah Walker. The report showed a Facebook post made by Candidate Chayton Fivecoat on March 31st, 2020 at 11:32pm (est) endorsing Selena Bazzi and Josiah Walker. Selena Bazzi then liked and commented on it April 1st, 2020 at 2:46am (est) sharing the link to vote.umich.edu and claiming that Chayton was amazing. Additionally, the report showed a Facebook post of Sulayman Qazi endorsing Selena Bazzi and Josiah Walker on March 31st, 2020 at 11:52pm (est). Selena Bazzi and Josiah Walker then commented and liked it at 1:40am (est) and 1:44am (est). The question was raised if commenting and liking on posts qualify as campaigning per the definition in the Election Code, 18.00.02 (b) “Campaign: Urging, endorsing, or advertising for or against any candidate, party, or position on a referendum.”

Election Director’s Decision if Demerit: No, this would not qualify for any demerits.

Reasoning: It is the opinion of the Election Director, Tyler Ziel, that technically, how social networking works (items liked, commented, and shared are public for people to see and is shared with one’s friends and possibly more) and based on actual federal laws in regards to if liking posts on social media (see National Labor Rights Act of 1934 and how it has been interpreted by the court in regards to employees’ use of social media in disputing workplace conditions as a relatively easy to understand example) is advertising and/or endorsing the opinion of the original post, as it a) put a person’s name as liking (i.e. supporting a post) and b) is advertised through one’s contacts and friends. This would imply that it is a violation 18.07.00 & 18.07.01.

However, it is also the opinion of the Election Director that to interpret the ruling that strictly, using only implicit campaigning and not explicit campaigning would: A) be a violation of 18.08.05-Interpreting Procedures, B) be an undue violation of a students’ freedom of speech per the All-Campus Constitution, and C) actively hurt the purpose of LSA SG as a whole. Per 18.08.05-Interpreting Procedures, it is “the policy of LSA SG to encourage the active and free dissemination of materials relating to LSA SG and that all
rules shall be construed liberally in favor of free and open communication and debate. The purpose of the rules and regulations regarding student government elections is not to be used as a method to remove candidates from election, but rather to protect the integrity of the election process.” To limit a candidate’s ability to comment and like posts, it discourages the active and free dissemination of materials of LSA SG, and would not be liberally in favor of free and open communication.

Additionally, while there is implicit advocacy, the limiting of a candidate’s freedom of speech in such a matter is not for the benefit of the election process, and in good conscious could not be limited, as the point of restrictions of freedom of speech during campaigning is to guard against unscrupulous practices, as well in LSA SG’s case, promote camaraderie between all candidates by having them focus on the greater good on just getting students to vote in the election. A like and comment (unless the comment explicitly advocates for or against a particular candidate(s), platform(s), and/or referendum(s)) is not an unscrupulous practice and actively engages with the constituency who have shown interest and are dedicated to voting.

Finally, on the point of engaging with the constituency, it actively encourages the election and non-candidates’ opinions, thus getting more awareness for LSA SG, fostering good relations with the student body, and potentially getting more students to vote. To rule otherwise would be to unjustly castrate the candidate into being a mute whom can only engage with the students they are trying to represent with a simple “go to the polls” and answering simple yes or no questions with nothing more, depriving them of their rights and hurting the government and student body we are supposed to support and uphold.

Major violation of 18.07.01 Government Promotion

Time of Decision: April 4th, 2020 at 4:55pm (est)

Background: We received a report of a potential violation from a student on Wednesday April 1st at 1:00am. There were two different screenshots of Selena messaging in two separate Groupme chats with the same message “POLLS ARE OPEN, PLEASE VOTE ! I am running for president. Vote.umich.edu.”

Election Director’s Decision if Demerit: Yes, each instance constitutes a 3 point major violation per 18.08.02 (b). Thus totalling to 6 points.

Reasoning: The two screenshots are being treated as two separate pieces of campaign material per 18.08.04. Therefore both instances are subject to demerits. The reasoning for both instances are the same seeing as the medium was the same (Groupme) as well as the message sent in each. 18.07.01 allows candidates to promote an “approved LSA SG election message” in addition to “media messages created by candidates [to]
encourage voting in the election but may not mention any particular candidates.” Even though Selena is shown promoting the voting website and voting in the election, she additionally mentions herself as a presidential candidate.

We see 18.07.01 necessary so as to promote voting overall in the election rather than for any individual candidate during the voting period. Additionally this was reiterated in an email sent by Natalie on Monday March 20th at 2:59PM (est). It was written as follows: “Campaigning ends tonight at 11:59pm, which means that after that time you may not tell anyone to vote for you explicitly. You can tell them to vote at vote.umich.edu and say that you are running if they ask sometime between March 31st and April 2nd.” However, Natalie had made a mistake writing that the campaign period ended that night, when it really would end on the 31st. So she sent a follow-up email at 3:09pm (est) that same day correcting the mistake.

Given that there was a fair warning in the email prior to the voting period, and the fact that all candidates signed a contract waiving their ability to promote themselves during the voting period for the benefit of all involved in the election, we believe that Selena has violated the contract she signed and compromised made by all candidates in the election as well as the process approved by the elected student government of the student body of LS&A.

Major violation of 18.07.01 Government Promotion

Time of Decision: April 4th, 2020 at 4:55pm (est)

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Election Director’s Decision if Demerit: Yes, each instance constitutes a 1 point minor violation per 18.08.06. Thus totalling to 2 points.

Reasoning: The two screenshots are being treated as two separate pieces of campaign material per 18.08.04-Excelsivity of Campaign Rules, as each screenshot are separate campaign materials. Therefore both instances are subject to demerits. The reasoning for both instances are the same seeing as the medium was the same (Groupme) as well as the message sent in each. 18.07.01 allows candidates to promote an “approved LSA SG election message” in addition to “media messages created by candidates [to] encourage voting in the election but may not mention any particular candidates.” Even though Selena is shown promoting the voting website and voting in the election, she additionally mentions herself as a presidential candidate.
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However, Natalie had made a mistake writing that the campaign period ended that night, when it really would end on the 31st. So she sent a follow-up email at 3:09pm (est) that same day correcting the mistake.

Given that there was a fair warning in the email prior to the voting period, and the fact that all candidates signed a contract waiving their ability to promote themselves during the voting period for the benefit of all involved in the election, we believe that Selena has violated the contract she signed and committed an act of disservice to the elections process. Under this, Selena would be found of a major campaign violation per 18.08.02 (b): “campaigning during the voting period.”

**However**, it is the opinion of the Election Director that under 18.08.06-Extenuating Circumstances, these violations are reduced from a major violation to a minor violation. 18.08.06 states: “If an offense is listed under a specific category for Section 18.08.01-03, the Election Director may treat a violation as one that is from a less severe category if there are other circumstances that cause them to believe it should be punished less harshly.” The reasoning of this is due to the understanding of other cases of campaigning during voting period, in *implicit campaigning vs explicit campaigning*.

In similar decisions in regards to the campaigning by this Election Director, particularly in regards to liking and commenting on social networks, there is a difference between *explicit campaigning* (i.e. directly stating “vote for person a”) and *implicit campaigning* (i.e. implying “vote for person a”). When liking or commenting a post, it does advertise and endorse the sentiment of the post, and if that post is campaigning, it is the person who liked or commented on it that is *implicitly campaigning*. It was the decision of this year’s Election Director that such *implicit campaigning* is not a violation of the election code due to it violating 18.08.05 if it was interpreted as such, it being an undue violation of the student’s freedom of speech, per the All-Campus Constitution, during campaigning, and it being more detrimental to the integrity of the election and the Student Government as a whole by enforcing it.

The violations against Selena, and in general of 18.07.01, are in place to promote outreach to the student body to just vote in general, and to promote camaraderie between the candidates who would potentially have to work together in Student Government if elected. The specific messaging in 18.07.01, of mentioning a particular candidate when saying to go vote is determined by the elected Student Government of
the LSA Student Body is campaigning, whether it be “go vote here and for this candidate” or “go vote here and this candidate is in the race.” However, there is a difference between the two phrases: the first is explicit campaigning and the second is explicit implicit campaigning.

The post Selena made was the latter of being explicitly implicit with the posts stating: “POLLS ARE OPEN, PLEASE VOTE ! I am running for president. Vote.umich.edu.” In this, it is clear that Selena was implying for the members of the two GroupMe chats to vote for her, but as it was disseminating the voting website to encourage a higher voter turnout and not her not asking the member to directly vote for her, it was not her explicitly campaigning, and interpretations of the rules must be construed liberally in favor of free and open communication, per 18.08.05.

To issue a major violation demerit for this would be too draconian for the degree of the violation, in the opinion of the Election Director. All candidates agreed to follow the Election Code and not to campaign, and this being more explicitly implicit campaigning and a direct violation of 18.07.01 should receive demerits, but not to the level of a major violation.

Appeal Process

As you two have received xxx (x) demerit, you may appeal to CSJ per 18.04.07. To do this, you must submit in writing an intent to appeal to the Election Director during the 12 hour duration of the (new) unofficial results being submitted. Then, within a week of submitting an intent to appeal to the Election Director, you must file your case to CSJ. If neither happen, or you do not file the CSJ case within one week, the Election Director will be eligible to make the election results official, thus making them final and no longer subject to appeal.

To file a case, you must fill out the form by hand, scan it, and email it to the Chief Justice Henry Zurn (hzurn@umich.edu) in order to file a complaint. Below attached is the form, but it is also found here at this link: https://static.wixstatic.com/ugd/6cc94f_11949ae5a3d54119b8bec4789eca3a8e.pdf.

If you require any help doing such, we would be happy to help, however if you do not feel comfortable doing such, we can also point you in the direction to students who have expertise with CSJ. If there is trial, you are entitled to representation by a law student, if that is
Hello Jordan & Sai,

This email is an official notification of the final demerits tally on Election Code Violations brought forth to Natalie and I. Immediately below is the demerit count found in the Campaign Period, Voting Period, and the total demerits total. The reasoning for the splitting of demerits per period is due to the fact that the appeal process is different in Campaign Period than in Voting Period. Further Below is the explanations of the violations brought forth and explanations on whether or not a demerit was given. Finally, the last section is what you can do to appeal the decision on the demerits if you believe them in violation of LSA SG Bylaws, LSA SG Constitution, or the All-Campus Constitution.
Campaign Period Demerit Points: 1
Voting Period Demerit Points: 0
Total Demerit Points: 1

Explanation of Violation During Campaign Period

Minor Violation of 18.06.09- Proper Use of Email Privileges

Time of Demerit: March 24th, 2020, 6:20pm (est)

Background: Presidential Candidate Jordan Schuler initially contacted Election Director Tyler Ziel about a potential violation of the Election Code regarding emailing listservs that was committed by Jordan’s Ticket. Jordan confessed over the phone that the Vice-Presidential Candidate, Sai Pamidighantam, emailed a listserv to the executive board of a student organization. It was explained that a member of the organization told them to email the executive listserv, however not a member of the executive board itself. Jordan explained that the reasoning of him bringing this up was to be on the safeside before sending out any more emails to listservs and to see if it was a violation of the Election Code.

Election Director’s Decision if Demerit: Yes, it constitutes as a 1 point minor violation, per 18.08.01 (f).

Reasoning: 18.06.09- Proper Use of Email Privileges is quite clear what constitutes as legal email use, that “a candidate can only send emails to email groups that are owned by the candidate as defined by ‘mcommunity.umich.edu’ and are created expressly for campaign purposes, during the current election cycle.” The definition of what a group is per mcommunity.umich.edu is “a group in the MCommunity Directory is a list of people and/or groups that can be used for sending email and for authorization.” The executive email listserv is not an email group that was created by the candidate nor a group created expressly for campaign purposes.

Thus, it is a violation of 18.06.09. Additionally, while interpreting the procedures, as per 18.08.05- Interpreting Procedure, which states “In interpreting these procedures, it shall be the policy of LSA SG to encourage the active and free dissemination of materials relating to LSA SG and that all rules shall be construed liberally in favor of free and open communication and debate.

The purpose of the rules and regulations regarding student government elections is not to be used as a method to remove candidates from election, but rather to protect the integrity of the election process.” Limiting freedom of speech of a candidate in this way arguably discourages the active and free dissemination of materials relating to LSA SG, and that it might be debatable if the rules are construed liberally, however the major
purpose of the rules and regulations are to protect the integrity of the election process. Following the binding precedent of the Central Judiciary Case of Parikh v UEC, which states that limitations on freedom of speech of campaign, specifically in regards to emailing listservs, is “good for policy reasons,” noting previous issues with the rule not being enacted, and that it is not an absolute bar for freedom of speech. Because of this, we believe that upholding this rule is to protect the integrity of the election process.

Explanation of Violations During Voting Period

Major Violation of 18.07.00-Termination of Campaign Period & 18.07.01-Government Promotion

Time of Decision: April 3rd, 2020, at 8:26pm (est)

Background: On April 2nd, 2020, at 1:53pm (est), a student brought forth an Election Code violation to Election Director Tyler Ziel about potential campaigning by Jordan Schuler and Sai Pamidighantam. The report showed the General Counsel of the Student Government of LSA, Nick Bonde, advocating and endorsing the candidates of Jordan Schuler and Sai Pamidighantam during the last day of the voting period on the social networking site Facebook. Jordan Schuler and Sai Pamidighantam then liked the post and commented on it, thanking him for his support. The question was raised if commenting and liking on posts qualify as campaigning per the definition in the Election Code, 18.00.02 (b) "Campaign: Urging, endorsing, or advertising for or against any candidate, party, or position on a referendum."

Election Director’s Decision if Demerit: No, this would not qualify for any demerits.

Reasoning: It is the opinion of the Election Director, Tyler Ziel, that technically, how social networking works (items liked, commented, and shared are public for people to see and is shared with one’s friends and possibly more) and based on actual federal laws in regards to if liking posts on social media (see National Labor Rights Act of 1934 and how it has been interpreted by the court in regards to employees’ use of social media in disputing workplace conditions as a relatively easy to understand example) is advertising and/or endorsing the opinion of the original post, as it a) put a person’s name as liking (i.e. supporting a post) and b) is advertised through one’s contacts and friends. This would imply that it is a violation 18.07.00 & 18.07.01.

However, it is also the opinion of the Election Director that to interpret the ruling that strictly, using only implicit campaigning and not explicit campaigning would: A) be a violation of 18.08.05-Interpreting Procedures, B) be an undue violation of a students’ freedom of speech per the All-Campus Constitution, and C) actively hurt the purpose of LSA SG as a whole. Per 18.08.05-Interpreting Procedures, it is “the policy of LSA SG to encourage the active and free dissemination of materials relating to LSA SG and that all
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Finally, on the point of engaging with the constituency, it actively encourages the election and non-candidates’ opinions, thus getting more awareness for LSA SG, fostering good relations with the student body, and potentially getting more students to vote. To rule otherwise would be to unjustly castrate the candidate into being a mute whom can only engage with the students they are trying to represent with a simple “go to the polls” and answering simple yes or no questions with nothing more, depriving them of their rights and hurting the government and student body we are supposed to support and uphold.

Appeal Process

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If you require any help doing such, we would be happy to help, however if you do not feel comfortable doing such, we can also point you in the direction to students who have expertise with CSJ.