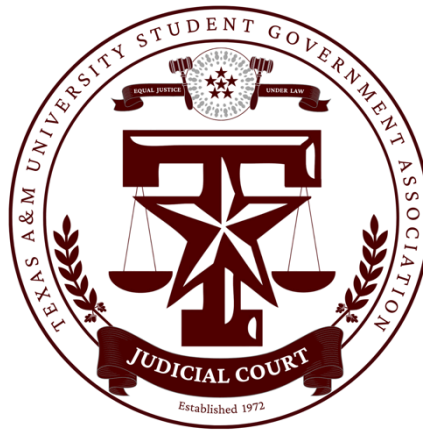


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## THE JUDICIAL COURT OF TEXAS A&M

### Petition for Writ of Certiorari

#### Petitioner Information

**Name:** Quillan Thurman

**Email:** [REDACTED]

**Phone:** [REDACTED]

**UIN:** [REDACTED]

#### Filing Against

**Name:** Rachna Edular

**Organization:** Election Commission

**Position:** Election Commissioner

#### Statement of Relevant Facts

On February 25, 2025, a social media video was posted in which a popular campus influencer, “Salami the Aggie,” publicly endorsed the Good Bull Ticket (a slate of candidates including Riley Pritzlaff for Student Body President and Ezra Villarreal for Vice President). In that video and related posts, Salami the Aggie announced a giveaway of \$200 to Texas A&M students shortly before or in conjunction with his endorsement. A violation report was filed alleging that this conduct – a supporter offering monetary incentives while endorsing a candidate – “*undermin[es] the fair nature of elections*” and thus constitutes grounds for disqualifying the Good Bull Ticket. Under the Election Regulations, any supporter’s actions are attributable to the candidate, so Salami’s acts would be imputed to Good Bull. The report argued that by using a delegate to entice voters with cash, the Good Bull campaign was violating fundamental election fairness.

Separately, another violation report noted that a Good Bull candidate had posted a campaign video on social media featuring the candidate using a large banner to solicit votes, with a caption touting the candidate’s willingness to

“banner in 9° weather” as a reason to vote for them. This banner was a prominent part of the campaign message in the video, yet its cost was omitted from the candidate’s finance report, which had already been submitted to the Election Commission. The report alleged that failing to report the banner as a campaign expense violated the Election Regulations requiring all materials used in campaigning to be documented on the expense report by the deadline.

The Election Commission considered these matters on February 26, 2025, and ruled that no violations occurred. By a 5-0 vote, the Commission dismissed the Salami endorsement/monetary giveaway issue as “NOT A VIOLATION,” reasoning that because the activity took place on the internet with no direct monetary “transaction” or on-campus rule violation, it “*does not fall under commission regulation.*”

The Commission noted that the provided evidence did not show an official campaign expense or purchase, and it deemed the \$200 giveaway post “not relate[d]” directly to the campaign. In the case of the unexpensed banner, the Commission again marked it “NOT A VIOLATION,” simply referencing an earlier decision (“see Violation 94”) without further explanation. Essentially, the Commission declined to penalize the Good Bull Ticket for the undisclosed campaign material in the video.

The election commission has made numerous decisions claiming that materials or “props” used in videos and online materials should not be expensed. The Commission has also ruled that it cannot regulate any online activity (“The solicitation of votes is done by the electronic media, which the commission cannot regulate,” Violation 81) These interpretations of the code have resulted in many violations being overturned. In previous years, these would have been considered as violations (See *Lula v Commission*, *Coppinger v Commissioner Ramos*, *McIntosh v Commission*, *Senator Bowen v. Commissioner Jackson*, *Carlson v. Election Commission*). Given my knowledge of the 2024 amendments to the election code (SA-77-07), I know that these were not involved in the changes that were made to the code, either in text or in spirit.

The contested rulings are 20, 21, 22, 23, 95, 96, 97, 98, 103. The Petitioner contends that these rulings were clear error. Good Bull’s actions – through its supporter offering money for votes and through failing to report campaign expenditures – amount to major violations of the Election Regulations. By ignoring these offenses, the Election Commission allowed a serious breach of campaign ethics and finance rules to go unaddressed, potentially skewing the election’s fairness. Petitioner now seeks Judicial Court review of the Commission’s decisions via this writ of certiorari.

#### Applicable Statute(s)

- **Election Regulations, Art. V, §1(b) – Candidate Responsibility for Supporters:** “*The candidate shall be held responsible for the actions taken by their supporter. Any violation of the regulations by a supporter of a candidate could result in a fine for the candidate. A supporter is anyone who (including but not limited to): (1) Speaks as a delegate of the candidate, holds banners, works on financial reports, or distributes campaign materials.*” This provision makes candidates accountable for the conduct of their endorsers, campaign workers, and anyone acting on their behalf.
- **Election Regulations, Art. V, §1(c) – Reporting of Campaign Materials/Expenses:** “*Materials used for general campaigning must be included in the expense report that is to be submitted on the Wednesday during the week of voting by 5:00 p.m. No expenses shall be made past this deadline.*” Additionally, “*A candidate should expense items that are used in campaigning that they interact with for the purpose of soliciting votes.*” Campaign materials are defined broadly as “*anything distributed or displayed for the purpose of soliciting votes for a candidate.*” These rules require full transparency in campaign finances by mandating that every item used to campaign (whether physical or digital) be documented on the candidate’s finance report by the specified deadline.
- **Election Regulations, Art. VII, §III(a)(1) – Major Violations Definition:** “*Major violations include, but are not limited to: proven offenses against state or federal law to any degree; sabotage of opposing campaigns; voting fraud; falsified documents (with proof included to show falsification, including finance*

*form*); *campaign ethics violations*; and *obstructions of the free and fair nature of voting*.” (emphasis added). This provision classifies serious breaches – such as undermining election fairness or falsifying campaign finance forms – as **Tier 1 (major) violations**.

- **Election Regulations, Art. VI, §IV(a)–(b) – Penalties and Disqualification Standard:** For major violations, the Election Commission may impose either a fine up to 15% of the candidate’s budget or disqualification from the election. “Disqualification shall only be applied in cases where the violation can be confidently determined to undermine the free, fair, and safe nature of the election.” In addition, certain violations of campaign finance rules are explicitly listed as disqualifying offenses, such as exceeding the spending limit or failing to submit required finance forms.
- **SGA Election Regulations, Art. I, §II – Judicial Review:** “*These regulations are subject to interpretation only by the Election Commissioner and are subject to review only by the Student Government Judicial Court.*” This establishes that the Judicial Court has authority to review and overturn the Election Commission’s interpretation or application of the Election Regulations on appeal.
- **SGA Election Regulation, Art. VI, §III (a)(1)-**The Election Commission shall not regulate any activity over the Internet or other electronic media. The following exceptions apply to this rule: (1) Any internet activity in which there is a monetary transaction, including, but not limited to, advertisement, hosting, or the purchase of products (physical or electronic) must be documented and expensed in accordance with the financial rules in these Regulations.”
- **SGA Election Regulation, Art. VI, §III (a)(3)-** “Evidence found on the internet of physical campaign violations shall be accepted by the Election Commission.”

*Relevant Judicial Court Bylaws:* The Judicial Court’s own bylaws affirm the Court’s duty to uphold the SGA Constitution and all election rules, ensuring that elections are fair and that justice is equally applied. Upon appeal, the Court may issue orders (such as writs of certiorari) to correct any misapplication of the Election Regulations by the Commission. While the Election Regulations (cited above) provide the substantive rules for campaign conduct and penalties, the Judicial Court’s appellate jurisdiction empowers it to enforce those rules and provide remedies (including disqualification) when the Commission errs.

How the statute(s) is / are applicable

**1. Supporter’s Endorsement & \$200 Giveaway – Undermining a Free and Fair Election:** The Election Regulations make it unequivocal that candidates are responsible for the conduct of their supporters. Here, there is no dispute that Salami the Aggie was acting as a supporter of the Good Bull Ticket: he “spoke as a delegate” by explicitly endorsing Good Bull, and even appeared in campaign-related media with the candidates, placing him squarely within the definition of a supporter or campaign delegate. Accordingly, any violations committed by Salami in the course of promoting the campaign are violations by the Good Bull Ticket itself.

Salami’s offer to give \$200 to students in tandem with his endorsement is a *grave campaign ethics violation* and an *obstruction of the free and fair nature of voting* under the Election Regulations. While the Election Commission focused narrowly on whether an “internet monetary transaction” occurred, they ignored the broader and more crucial point: a candidate (through their agent) was effectively attempting to financially influence the electorate’s votes. Such conduct strikes at the heart of a fair election. Voters might feel pressured or enticed to support Good Bull not on the merits of the candidates, but due to the prospect of personal gain. This is analogous to vote-buying or bribery, which plainly undermines the “free and fair” character of the voting process. Indeed, the Regulations classify “obstructions of the free and fair nature of voting” and “campaign ethics violations” as major violations. Offering money in the context of soliciting votes falls under both categories. By allowing a supporter to do so on its behalf, the Good Bull campaign violated these core principles of fairness.

The Commission’s rationale that Salami’s social media activity did not involve a regulated transaction is a misapplication of the rules. The *intent* of the exception for electronic media (Art. V, §3(a)) is to exempt typical internet campaigning from undue regulation unless money is being spent (e.g. on ads or purchased content). It was not intended to legalize otherwise unethical behavior simply because it occurs online. Here, even if Salami’s \$200

giveaway was a personal gift and not a direct campaign expenditure, it directly intersected with campaign advocacy – effectively functioning as an unreported in-kind contribution to boost Good Bull’s campaign appeal. The Commission’s own cited rule states that any online activity involving a monetary exchange must be “documented and expensed” in accordance with finance rules. Yet, no such documentation exists for Salami’s giveaway; if anything, this underscores that the activity was non-compliant. More importantly, the Commission is charged with upholding free and fair elections beyond mere bookkeeping. The Election Regulations grant the Commission authority to determine ethical violations “based on common sense and reasonability” in line with preserving a fair election. Common sense dictates that dangling a cash reward while endorsing a candidate is an improper distortion of voter incentives. By failing to recognize this as a major violation, the Commission abdicated its duty to enforce the rule against undermining fair elections. In sum, under the applicable statutes, the Good Bull Ticket is liable for its supporter’s actions and those actions constitute a major violation because they compromise the free choice of the voters. This major violation meets the precise criterion for disqualification: it can be “confidently determined to undermine the free, fair, and safe nature of the election.”

**2. Failure to Expense Campaign Materials and Campaigning in the MSC:** The Election Regulations create a strict requirement of financial transparency – every campaign material or resource used to promote a candidacy must be reported in the candidate’s expense report by the designated deadline. Good Bull violated this requirement by utilizing a large banner in a campaign video without reporting the banner’s cost on the finance form. The banner was not an incidental background object; it was central to the campaign message (“vote for a senator who is willing to banner in 9° weather” and clearly falls under the definition of a campaign material – something displayed for the purpose of soliciting votes. The rules even anticipate scenarios like this by advising that candidates must expense items they interact with while campaigning. By omitting the banner, the Good Bull candidate submitted an inaccurate and incomplete finance report to the Commission.

Failure to list a campaign expenditure is not a trivial paperwork mistake; the Regulations deem the falsification or concealment of campaign finance information a major violation. In fact, “falsified documents...including finance form” are explicitly listed alongside the most egregious election offenses. Here, the banner had an inherent value (whether it was purchased, borrowed, or reused, it would have a fair market value that needed disclosure). Not reporting it thwarted the purpose of the finance rules, which is to allow the Commission (and other candidates and voters) to verify that no campaign exceeds spending limits or gains an unfair advantage through undisclosed resources. We note that if the banner’s inclusion would have caused Good Bull to exceed the allotted campaign budget, that alone is a separate ground for automatic disqualification under the rules. At minimum, Good Bull’s finance form omission is a Tier 1 violation because it involves a campaign materials expense not accounted for – effectively a misrepresentation of their finances.

The Election Commission’s decision to summarily dismiss this violation (merely citing “See Violation 94” was erroneous. Violation 94 dealt with whether filming in the MSC constituted prohibited in-person campaigning, which the Commission decided it did not. However, that determination is unrelated to the financial reporting duty at issue here. Filming a video in a particular location might or might not be permissible, but failing to report campaign expenditures used in that video is not permissible. The Commission conflated two distinct issues. Even if we accept the Commission’s finding that the act of filming with a banner in the MSC was not an active solicitation under the rules, the fact remains that using the banner for campaign purposes triggered the separate obligation to expense that banner. There is no exception in the regulations that would waive the reporting requirement for materials simply because they appeared in a video or because no voters were physically present. To the contrary, the rules protect exactly this scenario – to ensure candidates don’t use unreported resources online any more than in person. By overlooking the missing banner expense, the Commission failed to enforce Article V, §1(c). The result is a candidate potentially getting away with spending that was hidden from oversight. This undermines the transparency and equity of the election process.

In applying the statutes, the Good Bull Ticket’s actions here also rise to the level of a major violation. It either constitutes a “falsified document” (an incomplete finance report) or at least a significant finance violation that gave Good Bull an undue advantage. Under the tiered violation system, finance violations not rising to major status are generally “minor”, but an intentional or substantial omission – especially one essential to the campaign’s messaging – should be treated as major. The Commission had the discretion to treat this as a serious offense, and the plain

language of the “falsified documents” provision supports doing so. Yet, the Commission chose to ignore the violation entirely. The Judicial Court, in reviewing this matter, should find that the unexpensed banner was a clear violation of the campaign finance rules. Good Bull’s failure to disclose campaign materials strikes at the integrity of the election finance system, and when combined with the aforementioned vote-influencing scheme, paints a picture of a campaign that flouted the rules to gain advantage.

**3. Pattern of Violations Justifying Disqualification:** Whether considered individually or in combination, the Good Bull Ticket’s violations meet the threshold for the severest sanction – disqualification. The supporter’s cash giveaway scheme directly undermined the free and fair nature of the election, satisfying the condition in which disqualification “shall only be applied”. Separately, the failure to expense campaign materials undermined the fairness of the election’s financial playing field and the transparency of the process, which is likewise fundamental to a fair election. The Election Regulations entrust the Commission to enforce these rules and, where appropriate, remove candidates who have gained an unfair edge or corrupted the process. In this case, rather than enforcing the rules, the Commission issued no penalty at all, effectively condoning the behavior. This leniency is inconsistent with the Regulations and with past practice. (Notably, earlier in the election cycle the Commission had held that if one member of a ticket committed a major violation, the entire slate could be penalized—yet Good Bull’s entire slate was not held accountable here despite clear misconduct.)

The Judicial Court’s bylaws and the SGA Constitution charge this Court with upholding the integrity of student elections. The Court is the only body that can correct the Commission’s misinterpretation of the Election Regulations. In this case, correcting the error means recognizing that Good Bull’s conduct violated multiple provisions designed to ensure a fair election, and that the proper remedy under those provisions is disqualification. By doing so, the Court will reinforce that no candidate or ticket is above the rules, and that creative attempts to circumvent campaign regulations – whether by moving illicit tactics online or by omitting expenses – will not be tolerated. This is crucial to maintaining a level playing field for all candidates and preserving student trust in the election outcome.

### Desired Result

For the foregoing reasons, Petitioner respectfully requests that the Judicial Court grant this Petition for a Writ of Certiorari and review the Election Commission’s rulings regarding the Good Bull Ticket. Upon review, Petitioner asks the Court to overturn the Commission’s “Not a Violation” determinations and find that the Good Bull Ticket committed major violations of the Election Regulations. Specifically, Petitioner urges the Court to rule that:

- The Commission’s relevant decisions be reversed, and
- The Good Bull Ticket, through the actions of its supporter Salami the Aggie, violated the Election Regulations by undermining the free and fair nature of the election (a major violation), and
- The Good Bull Ticket violated the Election Regulations by failing to expense and report campaign materials (the banner used in its video), amounting to a significant campaign finance violation, and
- The Good Bull ticket violated the Election Regulations by campaigning in the MSC.

In light of these findings, the Petitioner requests that the Judicial Court impose the appropriate sanction of disqualification of the Good Bull Ticket from the Spring 2025 Student Government election. Disqualification is warranted and indeed mandated in this situation because the Good Bull Ticket’s actions compromised the fundamental fairness and integrity of the election process. Granting this relief will nullify Good Bull’s candidacy (or any election results in its favor), thereby protecting the student body from an election tainted by rule-breaking. Petitioner further asks that the Court provide any additional remedies it deems just and proper, such as instructing the Election Commission to update the public violation report to reflect these violations, and ensuring that the second-place candidate or next eligible entity assumes any position for which Good Bull was disqualified (if applicable).

By intervening in this case and disqualifying the Good Bull Ticket, the Judicial Court will reaffirm the principle that all candidates must follow the Election Regulations to ensure a fair election. This outcome will safeguard the

legitimacy of the Student Body elections and uphold the rule of law within the Texas A&M University student governance system.

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**By signing this document, I hereby certify that all written statements herein are true and correct. I further acknowledge that the submission of false statements is a violation of the Aggie honor code.**

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**Digital Signature:** Quillan Thurman

**Date:** 3/2/2025