Associated Students, Incorporated
2015 General Election

ELECTION COMPLAINT FORM

If filing a complaint, submit both:
- The Election Complaint Form to ASIElections@csus.edu no later than Wednesday, April 29, 2015, by 4:00pm; and
- The required $25 deposit, per filed complaint, to ASI Government Office, 3rd floor, University Union, no later than Wednesday, April 29, 2015, by 4:00pm.

ATTENTION: PLEASE SEE SECTION IX AND X
OF THE ELECTIONS CODE BEFORE COMPLETING

COMPLAINT ALLEGATIONS
Specify the sections of the ASI Elections Code you allege were violated and by whom, or other conduct and by whom, which allegedly unfairly affected the election. Remember that only one candidate may be named. Please be as specific as possible.

Iris San (UPAH) violated: Article V Section B #4, Article V Section B #2, Article V Section B #5 by not reporting all expenses related to her website.

EVIDENCE
Please provide a brief summary of the oral and written evidence in support of this complaint including the names of witnesses you expect to testify.

(See Pages 3-9) Creating and Running a Website requires more than a domain name.
You also must purchase a hosting service, and like Iris did, you may also purchase security and a production application. These costs were not reported. Her computer report allowed her to stay under the $5000 max.

REMEDY
Please propose one or more remedies the Election Complaint Committee is authorized to grant under part XI of the ASI Elections Code a remedy that you believe would be fair to settle your complaint.

According to the Election code, failing to report expenses will result in immediate disqualification. Also, if she reported these expenses, she would have exceeded the $5000 max for spending.

Please attach additional sheets as necessary.

Complainant: Tucker Caruso
(person filing the complaint)
Associated Students, Incorporated  
2015 General Election

ELECTION COMPLAINT FORM

If filing a complaint, submit both:

- The Election Complaint Form to ASIElections@csus.edu no later than Wednesday, April 29, 2015, by 4:00pm; and
- The required $25 deposit, per filed complaint, to ASI Government Office, 3rd floor, University Union, no later than Wednesday, April 29, 2015, by 4:00pm.

ATTENTION: PLEASE SEE SECTION IX AND X OF THE ELECTIONS CODE BEFORE COMPLETING

COMPLAINT ALLEGATIONS
Specify the sections of the ASI Elections Code you allege were violated and by whom, or other conduct and by whom, which allegedly unfairly affected the election. Remember that only one candidate may be named. Please be as specific as possible.

In the past, (VPAA) violated Article V Section 4, Paragraph 1, Article V Section 4 by using the #VoteVision on his multiple social media platforms, connecting himself to other candidates.

EVIDENCE
Please provide a brief summary of the oral and written evidence in support of this complaint including the names of witnesses you expect to testify.

(See Pages 16-17) Using Instagram, Twitter, and Facebook, I was promoted and used the hashtag #VoteVision. This hashtag created a connection that placed multiple candidates in one promotional item.

REMEDY
Please propose one or more remedies the Election Complaint Committee is authorized to grant under part XI of the ASI Elections Code a remedy that you believe would be fair to settle your complaint.

(Ambiguous sentence)

Please attach additional sheets as necessary.

Complainant: Tucker Caruso
(person filing the complaint)
ELECTION COMPLAINT FORM

If filing a complaint, submit both:

- The Election Complaint Form to ASIElections@csus.edu no later than Wednesday, April 29, 2015, by 4:00pm; and
- The required $25 deposit, per filed complaint, to ASI Government Office, 3rd floor, University Union, no later than Wednesday, April 29, 2015, by 4:00pm.

ATTENTION: PLEASE SEE SECTION IX AND X OF THE ELECTIONS CODE BEFORE COMPLETING

COMPLAINT ALLEGATIONS
Specify the sections of the ASI Elections Code you allege were violated and by whom, or other conduct and by whom, which allegedly unfairly affected the election. Remember that only one candidate may be named. Please be as specific as possible.

Iris San (VPAA) violated Article V Section 4A of ASI website “Campaigning may not begin prior to Monday, March 30, 2015, 7:00 am.”

EVIDENCE
Please provide a brief summary of the oral and written evidence in support of this complaint including the names of witnesses you expect to testify.

(See Pages 10-12. Iris launched her social media campaign prior to the onset of campaigning. (Screen shot attached). She was able to also be competitive in board placement by launching early instead of having to choose between two.

REMEDY
Please propose one or more remedies the Election Complaint Committee is authorized to grant under part XI of the ASI Elections Code a remedy that you believe would be fair to settle your complaint.

Disciplinary action. All candidates are responsible for knowing and upholding the election code. Failure to enforce the code encourages future candidates in disregard of the code.

Please attach additional sheets as necessary.

Complainant: Tucker Caruso
(person filing the complaint)
ELECTION COMPLAINT FORM

If filing a complaint, submit both:

- The Election Complaint Form to ASIElections@csus.edu no later than Wednesday, April 29, 2015, by 4:00pm; and
- The required $25 deposit, per filed complaint, to ASI Government Office, 3rd floor, University Union, no later than Wednesday, April 29, 2015, by 4:00pm.

ATTENTION: PLEASE SEE SECTION IX AND X
OF THE ELECTIONS CODE BEFORE COMPLETING

COMPLAINT ALLEGATIONS
Specify the sections of the ASI Elections Code you allege were violated and by whom, or other conduct and by whom, which allegedly unfairly affected the election. Remember that only one candidate may be named. Please be as specific as possible.

Iris Savy (UPAA) violated: Article V Section C. #6 by lying about her experience on her website.

EVIDENCE
Please provide a brief summary of the oral and written evidence in support of this complaint including the names of witnesses you expect to testify. (See pages 23-38)

Andrea Salas can testify that Iris does not have two years of leadership experience as claimed by her website. Iris reported that she worked Summer 2012 and Summer 2013 as an Orientation Leader, when she only worked Summer 2012.

REMEDY
Please propose one or more remedies the Election Complaint Committee is authorized to grant under part XI of the ASI Elections Code a remedy that you believe would be fair to settle your complaint.

Disqualification. Allowing a candidate to lie about experience destroys the integrity of the ASI Election. Disqualifying the election code away from any misrepresentation is strictly prohibited.

Please attach additional sheets as necessary.

Complainant: Tucker Cavuso
(person filing the complaint)
Election Complaint

Iris San

Candidate for Vice President of Academic Affairs
Complaint Part I

Failure to Report Actual Costs of Campaign Website
Complaint Allegation

Iris San, candidate for Vice President of Academic Affairs, created a website for campaigning purposes (Figure 1). I am alleging that the commercial cost for the website is more than the candidate reported in her expenditure report. There is more to the candidate’s website than just a domain name. According to a website analysis by Statsbee (Figure 3), the website is hosted by Media Temple, Inc and created in Wordpress. Its SSL certificate is issued by Go Daddy. The Website was registered with eNom (Figure 3). According to the Election Code, candidates running for an executive position can spend no more than $500. If the candidate had reported the actual commercial cost (regardless of donations), the candidate would be over the $500 spending limit. Additionally, the Election Code specifies that the expenditure report must include a list of gifts/donations at their retail value (refer to next slide). Additionally by only reporting the domain expense the candidate left out numerous other expenses her website had.

Candidate Reported:
- Averaged cost of website domain name: $8.00
- Total expenditure: $414.69

Un-Reported expenses (See figure 4)
- Media Temple, Inc (hosting service)- $60 monthly
- Wordpress (Creation tool)- $99 year (no Monthly Option Available)
- eNom (domain name)- $13.95 (was reported from expenditure report but from different source)
- Go Daddy(SSL service)- $55.95/year (no Monthly Option Available)
Reference to the Election Code

Article V. FAIR CAMPAIGNING AND PUBLICITY

Candidates and students seeking to place a referendum or initiative on the ballot for an election ("Interested Students") shall be responsible for complying with all provisions in this Elections Code, including those pertaining to the conduct of their campaigns and campaign workers. Violation of any provision of this Elections Code by the candidates or their campaigns or campaign workers by Interested Students shall be grounds for the Elections Complaint Committee to order remedies as provided in this Elections Code.

A. Campaign Period

1. Neither candidates nor Interested Students may begin campaigning until after receipt of notification of eligibility. Notification of eligibility will be made by the ASI Executive Director.

2. The campaign period shall be determined by the ASI Board of Directors and may not begin sooner than thirty (30) calendar days before the first day of voting. The time and date will be designated in the Candidate Elections Packet.

B. Campaign Expenditures

1. The candidate or Interested Student shall be required to turn in personally to the ASI Government Office, a Campaign Expenditure Form listing all his/her campaign expenses. This form must be received by ASI Government Office no later than 4:00 pm Pacific Time on the Monday following the elections. This statement must be time-stamped to be considered "turned in." Failure to submit a Campaign Expenditure Form and all required materials shall be a violation of this Elections Code and will result in disqualification.

The Campaign Expenditures Form shall include:

a. The receipts of all items purchased. These shall include the name and telephone number of the seller.

b. A listing of all gifts, donations, and/or rental materials and their retail value. Power and hand tools (such as hammer, staple gun, electric drill, cutting tools, etc.) used to assemble promotional materials will be exempt.

c. All professional labor costs. Professional labor in this part shall mean any labor performed by a person who has specialized training to perform such labor and does carry on or has carried on such labor in their pursuit of a job or career.

d. Newspaper ads classified, which promote a candidate or position on a referendum/initiative, unless it can be shown that the candidate or Interested Students did not control the placement.

e. Written estimates showing retail value for any donated items and/or services without a receipt must also be attached. Receipts for all materials purchased should show actual amount paid for such items as well as any discount (except those available to the public at large). Such discounts (except those available to the public at large) shall be counted as a gift or donation. Failure to provide receipts as provided for in this part for all purchased items is a violation of this Election Code.

2. An itemized campaign expense statement shall be required of all candidates and Interested Students regardless of the amount of money spent, even if money is spent. Failure to submit a Campaign Expenditure Form and all required materials shall be a violation of this Elections Code and will result in disqualification.

3. If a candidate or Interested Student receives any gifts, discounts and/or donations, retail cost shall be counted in the candidate's or Interested Student's Campaign Expenditure Form.

4. A candidate running for an Executive position shall be allowed to spend a maximum total of $500.00. This total shall include all contributions, gifts, discounts and/or donations by individuals, businesses and/or organizations, including the candidate.

5. A candidate running for a Board position shall be allowed to spend a maximum total of $300.00. This total shall include all contributions, gifts, discounts and/or donations by individuals, businesses and/or organizations, including the candidate.

6. Neither candidates nor Interested Students will be allowed to combine their individual spending limits with other candidates. This includes the purchase of materials for use by multiple candidates.

7. For elections involving a referendum or initiative, the ASI may set spending limits on Interested Students or the campaign. In no event shall ASI funds be used to support or oppose a referendum or initiative unless an equal amount of funds are allocated to both sides of the issue.

8. Only one candidate name per promotional item will be allowed.

9. The quantity discount and shared "set up" fee associated with the purchase of t-shirts or other promotional materials for a collective of candidates (e.g., "state") could be tantamount to pooling funds, which is prohibited.
Figure 1: Proof of Website

(A) Promotional material on Facebook promoting the candidate’s website
(B) Promotional business card promoting the candidate’s website

The candidate also mentioned the existence of her website in her candidate forum.
Figure 2: Quality of a Vision Website

**STUDENT REPRESENTATION & SHARED GOVERNANCE**

I believe that university committees are crucially important on this campus. There are 67 committees internal and external that students are a part of. Each College Director is responsible to serve on two committees minimum. There are over 29,000 students on this campus and 14 on the ASI Board of Directors. I realize that we need to share the governance with students in areas that they are passionate in. I will do this by tabling at New Student Orientation, finding students in the classroom, and accepting faculty recommendations to fill ALL of our university committees with qualified passionate students. A couple ways I believe we can improve Student Representation:

- Fill University Committees with students that are passionate in the committee's interest area
- Utilize surveys and questionnaires to create a list of student issues that we face.
- Improve collaboration between students and faculty to create an open environment where issues can be communicated.

---

**ASI TRANSPARENCY**

Every student pays $64 every year into the ASI Budget. Like many students of this campus, I do not know where the all the money in ASI’s 8 million dollar budget goes to. I see this as a problem. The actions of the Board of Directors should be transparent and easily accessible. If elected, I believe this can be accomplished in a few ways:

- Seek innovative ways to reach students and keep them knowledgeable with actions of the Board of Directors and how they will impact them.
- Collaboration between university departments, i.e. Women's Resource Center, Financial Aid, Admissions, Housing and Residential Life, etc.
- Larger presence of ASI through programs and classroom presentations.

---

**UNIVERSITY DEVELOPMENT**

Sac State is making a difference by investing in our University infrastructure by building a new residence hall and modernizing some of our existing buildings. But still, we face problems where students are not able to take the classes they need to graduate. In ten years from now, I can see Sacramento State as the beacon of higher education in the CSU system. But in order to achieve this, we must not be afraid to think outside of the box and look for new solutions to the problems we face.

- Lobbying for higher education funding at the State Level
- Collaborate with California State Student Association to share issues on Sacramento State's campus and seek solutions through input from the other CSU Campuses.
- Create a community campus embracing our "commuter/semi-residential" reputation and creating a campus culture of pride

---

- This is a screenshot of another candidates website (all vision sites had the same look) because Iris took her website down immediately following campaigning I was not able to take a screen shot. Should she disagree with this platform she should present her website.
Figure 3: Evidence of Products used for Campaign Website
This screenshot displays a website analysis report for the candidate's website. The analysis shows that Media Temple, Inc. was used for the hosting service, the website was created with Wordpress, the website was registered through eNom, and the website's SSL certificate was issued by Go daddy. The commercial costs for these products was listed in the complaint allegation.
Figure 4: Evidence of commercial costs for all of the products used in creation of campaign website.

(A) (Hosting Service) Media Temple Inc.: cheapest option is $60/1 month ($20/month for 12 month subscription = $240 total).

(B) (Production Application) Wordpress: cheapest option is $99/year (no monthly option).

(C) GoDaddy Pro: (website security) cheapest option is $55.99/year (no monthly option).

(D) (domain Name) enom: $13.95 quote.
Proposed Remedy:

**disqualification** of the candidate as specified by the Election Code (*Article V Section B #1 and #2*) for failure to report retail costs of products used on the expenditure report

(this is like failing to report the cost of paint for a painted campaign board)
Complaint Part II

Improper Use of Social Media
Complaint Allegation

Iris San, candidate for Vice President of Academic Affairs, and a member on the “Vision” slate used multiple platforms of social media to campaign unfairly. Several members of the “Vision” slate and their supporters used a hashtag (#VOTEVISION) that linked several candidates together on one page (Figure 1). Furthermore, a photo captured of Iris San on Snapchat and two photos of Iris on Instagram prove that Iris was promoting this hashtag (Figures 2, 3 and 4). This means that one post was able to reach more voters. The hashtag links their posts together forming a single promotional item advertising multiple candidates.

This hashtag gave Vision candidates a significant advantage in regards to social media. The ASI election code clearly states that candidates “may only make reference to one candidate and use images of one candidate (article V, Section C, Paragraph i).” Additionally, the ASI Election Code states “only one candidate name per promotional item will be allowed (article V, Section D).”

As a candidate myself, I worked hard to make sure that I was abiding by the Election Code in all aspects of my campaign, including social media. Iris San had an unfair advantage because she did not abide by the Election Code.
Sunday after election. Campaign materials still up after this time shall be removed and disposed of by SO & L. If campaign material is not removed from campus by this time, the $50 candidate deposit shall be forfeited.

i. World Wide Web (WWW), Internet, computer network or computer program may be used if they do not impede the educational process as outlined by CSUS and/or the California Educational Code or violate another subsection of this Election Code or local, state, or federal laws, ordinances, rules or regulations. Candidates, organizations, and Interested Students using World Wide Web (WWW) and Internet media, such as social media sites or pages, may only make reference to one candidate and use images of one candidate. Candidates, organizations, and Interested Students are responsible for monitoring posts online that may combine them with others.

j. Candidates and interested individuals must make themselves aware of and adhere to other campus entities’ policies regarding solicitation, including campaigning.

k. There shall be no campaigning or any kind during ASI Board Meetings or meetings of any board or committee under the jurisdiction of the ASI, nor shall any campaigning take place within fifty (50) feet of any ASI Office.

l. ASI resources, materials, websites, logos or other digital items, which ASI has sole rights to shall not be used in any campaign materials unless explicitly approved by the ASI Board. Any violation of this area will result in disqualification, unless it can be shown that the candidate was not aware of the violation and did not condone the violation, in which case the Elections Complaint Committee will fashion an adequate remedy.

5. Misrepresentation in advertising or campaigning is prohibited.

D. Identification of Campaign Materials

All campaign literature, leaflets and other materials must bear the name of the candidate, organization, Interested Student or other individual responsible for the contents and distribution of that campaign material. The name of the candidate who is taking ownership of the promotional item on their Campaign Expenditure Form must be visible to the constituents. Names that are discretely displayed in a manner, such as on the back of buttons or the tags of clothing, is to be deemed non-visible to constituents.

E. Campaign Interference Prohibited
Figure 1: Evidence
This screenshot shows the hashtag "#VOTEVISION" on Instagram.
It demonstrates how multiple candidates were captured on one promotional item, a clear violation of the ASI Election Code.