

Majority Opinion

Lockhead and Guarco v. Mecklai

Heard April 25, 2016

Chief Justice Dana A. Raphael

Justice Andrew R. Distell

Justice Dean Ischiropoulos

Justice Analese Bridges

On April 25, 2016, petitioners Tanner Lockhead and John Guarco filed a formal petition with the Judiciary regarding President Keizra Mecklai's issue of a veto on April 24 and April 25, 2016 for the funding for the Chanticleer. The petitioners alleged that President Mecklai's veto of the Chanticleer funding in the context of the 2016-2017 Annual Budget approved on April 20, 2016 constituted a line-item veto and should therefore be declared unconstitutional.

Statement of Fact

On April 20, 2016, the Senate approved the 2016-2017 Annual Budget by a majority vote. The 2016-2017 Annual Budget contained \$20,000 allocated to the Chanticleer.

The Duke Student Government Senate voted to fund the Chanticleer with a 19-19 vote as an amendment proposed to the Annual Budget. In turn, Executive Vice-President John Guarco, as the President of the Senate – and in accordance with the Senate By-Law – voted in the affirmative thereby breaking the tie. Title II, Section II, Clause D of the Senate By-Law states that, “*The Executive Vice-President, in accordance with and in addition to the DSG Constitution shall: D. Vote on legislation to break a tie. If the Executive Vice-President casts the tie-breaking vote, they must announce at that time to the Senate that they have done so.*” The video footage of the final vote can be found at approximately the 2:57:00 mark. Subsequently, the Duke Student Government Senate voted 23-17 to pass the entirety of the Chanticleer Budget. The video footage of the vote for the entirety of the Chanticleer Budget can be found at approximately the 2:58:00 mark. Afterwards, Vice President of Durham & Regional Affairs Tanner Lockhead moved to bring “*A Budgetary Statute of the Duke Student Government to Fund the Duke Chanticleer*” to the top of the agenda. After the motion was made, it was seconded, and voted in the affirmative by the Senate. Vice President Tanner Lockhead, then, spoke in favor of the budgetary statute which was thereafter voted in the affirmative by a majority of the Senate. The video footage of the vote can be found at approximately the 3:01:00 mark.

On April 24, 2016, President Mecklai issued a formal veto on April 24, 2016, striking the \$20,000 in funding allocated to the Chanticleer in the 2016-2017 Annual Budget approved on April 20, 2016 (*Appendix 1*). This veto did not contain justification for striking the funding.

On April 25, 2016, President Mecklai issued a second formal veto of the \$20,000 in funding allocated to the Chanticleer in the 2016-2017 Annual Budget approved on April 20, 2016 (*Appendix 2*). This version was identical to the first veto issued, but it contained justification for the striking of the \$20,000.

On April 25, 2016, President Mecklai issued a third formal veto that vetoed the entire 2016-2017 Annual Budget approved on April 20, 2016 (*Appendix 3*).

During oral argument of *Lockhead and Guarco v. Mecklai* on April 25, 2016, the focus of which was on the use of the second veto, President Mecklai expressed her desire to rescind the third veto. Petitioners Lockhead and Guarco expressed during oral argument that they would not oppose the rescinding of the third veto.

On April 26, 2016, President Mecklai formally rescinded the third veto of the entire 2016-2017 Annual Budget approved on April 20, 2016, thus reverting back to the second veto (*Appendix 4*).

Relevant Law

Duke Student Government Constitution
SOFC By-Laws

Summary of Petitioners' Argument

The petitioners made three claims against President Mecklai.

1. President Mecklai's use of the first veto lacked the "specific objections" as required in Article 4, Section 5 of the Duke Student Government Constitution.
2. Both the first and second veto constitute a line-item veto, and should thus be declared unconstitutional.
3. Asked the Judiciary to clarify the meaning of what constitutes the Annual Budget.

Question One

Can a multiple vetoes for the same legislation be enacted and can the president rescind a previously issued veto?

Before the petitioners' arguments can be considered, first it must be determined which veto is currently in effect. There is nothing in the Duke Student Government Constitution or the by-laws that precludes a President from issuing numerous vetoes for the same legislation, or prohibits a president from retracting any of those vetoes. The Duke Student Government Senate may wish to clarify the limits of the veto power, but as it currently stands, nothing prohibits President Mecklai from either issuing multiple vetoes, or choosing to rescind her last veto.

Question Two: Petitioners' Claims

Petitioners' First Claim

Does President Mecklai's use of the first veto lack the "specific objections" as required in Article 4, Section 5 of the Duke Student Government Constitution.

Since the veto currently under discussion is the second veto, which neither petitioners nor respondents disagree did include "specific objections," there is no need for the Judiciary to consider the petitioners' claim regarding the first veto.

Petitioners' Second Claim

Does the second veto constitute a line-item veto, and is a line-item veto constitutional?

A line-item veto is, as defined by Merriam-Webster, "a power that allows a president, governor, etc., to officially reject specific parts of a proposed bill without rejecting the entire bill." The second veto President Mecklai issued reads:

"I hereby submit this letter as formal declaration of my decision to exercise the executive veto as granted by section 4, clause 8 of the Constitution regarding:

Chanticleer \$20,000

in the 2016-2017 Annual Budget approved on April 20, 2016."

The third veto President Mecklai issued reads:

"I hereby submit this letter as formal declaration of my decision to exercise the executive veto as granted by section 4, clause 8 of the Constitution regarding:

The 2016-2017 Annual Budget approved on April 20, 2016."

In the second veto, it is clear Ms. Mecklai intended to strike only the funding for the Chanticleer from the 2016-2017 Annual Budget approved on April 20, 2016 instead of the entire Annual Budget approved on April 20, 2016, which is what the third veto did. President Mecklai has since rescinded that veto.

The 2016-2017 Annual Budget approved on April 20, 2016 was one single piece of legislation that contained a summary of numerous other pieces of legislation already voted on and enacted. Despite containing a summary of numerous other pieces of legislation, the 2016-2017 Annual Budget approved on April 20, 2016 does constitute one piece of legislation. Funding for the Chanticleer was granted as an amendment to the 2016-2017 Annual Budget approved on April 20, 2016. Thus, striking one line or one amendment - the Chanticleer funding - from the 2016-2017 Annual Budget approved on April 20, 2016 constitutes a line-item veto.

Both President Mecklai and Petitioners Lockhead and Guarco agree that a line-item veto is unconstitutional unless explicitly granted to the executive for the same reasons the United States Supreme Court found the line-item veto unconstitutional unless explicitly granted in *Clinton v. City of New York (1998)*. A line-item veto, as summarized in *Clinton v. City of New York*, “gives the President the unilateral power to change the text of duly enacted statutes.”

As *Clinton v. City of New York* continues, “this decision rests on the narrow ground that the [line-item veto] procedures are not authorized by the Constitution.”

Since President Mecklai has not been granted line-item veto authority by the Duke Student Government Constitution nor by the by-laws, it cannot be assumed that she has the “unilateral power to change the text of duly enacted statutes.”

In summary, regarding the petitioners’ second claim, the majority finds that the second veto did constitute a line-item veto, and such line-item vetoes are unconstitutional unless that power is explicitly given to the executive. Thus, President Mecklai’s second veto is unconstitutional. The remaining first veto is also unconstitutional since it is identical in every way to the second veto except for a section outlining “specific objections.”

Petitioners’ Third Claim

Petitioners Lockhead and Guarco asked the Judiciary to clarify the meaning of what constitutes the Annual Budget: is it the final document summarizing all the other previously passed budgetary statutes, or does it also include every individual budgetary statute?

The majority finds it does not need to answer this question. The petitioners filed against President Mecklai's use of the line-item veto, which expressly referred to the 2016-2017 Annual Budget approved on a specific date, April 20, 2016. The use of the specific date indicates the veto was in relation to the one single piece of legislation containing a summary of numerous other pieces of legislation already voted on and enacted as opposed to a veto of every single individual budgetary statute of each different organization summarized in the 2016-2017 Annual Budget approved on April 20, 2016. Since the vetoes in question all specifically related to the 2016-2017 Annual Budget approved on the specific day of April 20, 2016, the majority sees no reason to clarify how the Annual Budget more generally may be defined. To avoid future issues of confusion, the Senate may wish to consider clarifying what it means when referring to the "Annual Budget."

Summary

In summary, the majority has declined to answer Petitioner Lockheed and Guarco's first and third claims. The majority determined that President Mecklai did in fact issue a line-item veto and further concluded that such line-item vetoes are unconstitutional unless a president is duly granted such power. Thus, there is currently no veto in effect for the 2016-2017 Annual Budget approved on April 20, 2016.

It is so ordered.

Dissenting Opinion

Lockhead and Guarco v. Mecklai

Heard April 25, 2016

Associate Justice Devavrat V. Dabke

Overview

This case is incredibly complicated, and the narrative is not particular clear. In sum, a statute was enacted by the senate that allocated a budget. Essentially, there were several layers of vetoes as issued by President Mecklai that obfuscate the legal proceedings herewithin (*Appendices 1, 2, 3, 4*). However, there are an inordinate number of procedural complications that are now brought forward.

Clarification of Fact I: The Judiciary Already Decided

First and foremost, the Judiciary had rendered a unanimous decision at 10:11PM EDT, April 25, 2016, sent in an email to Ms. Mecklai, Mr. Guarco, Mr. Hopkins, and Mr. Lockhead as follows:

“The Judiciary has unanimously decided to reject the case *Lockhead and Guarco v. Mecklai* on grounds of standing, since the most recent presidential veto overrides any previously issued vetoes. Questions regarding the line item veto and sufficient justification then need not be answered.”

According to the Constitution: “All decisions and rulings of the Judiciary shall be transmitted in writing by the Chief Justice, or by a Justice selected by the Chief Justice, to the appropriate officer or body.”

In this case, we had already transmitted a formal *decision* to all relevant parties and officers. Note the language in the email: “has unanimously *decided*” (emphasis added). Although it certainly did not look like a dressed-up decision, we satisfied the Constitutional requirement of a transmission in writing of a decision.

By even continuing this discussion of a new decision *after* a decision had already been rendered is frankly not a power vested to the Judiciary by the Constitution or the By-Law, has no legal precedence, and is an incredibly steep and slippery slippery-slope. What does it mean to issue a new decision on a case? Technically, by issuing the decision, we have fully dispatched a case from our docket. This majority decision that is issued is being declared onto a case not called or heard into the Judiciary.

For this reason, our original decision must stand until a new case is brought forth or tried, but in

this instance, since no new case was brought forth, even this very opinion is simply a judicial statement, not a legally binding opinion. The majority opinion itself should not even qualify as a majority opinion, as it not even an opinion.

Clarification of Fact II: A Late “Rescission” of a Veto

After the above decision was rendered, President Mecklai, upon *ex parte* prompting during judicial deliberations of the Weisman et al. v. Brunetti et al. case, *after* this case had been decided, transmitted the following:

“Hi all

I am formally rescinding my veto of the full annual budget. EVP Guarco verbally indicated that he will accept the rescinding of a veto and tanner and john indicated that they do not intend to sue to say that I cannot rescind a veto. With that said, is it possible for you to adjudicate the case as if that veto no longer exists, because it has been rescinded.

Let me know if you would like to see a formal signed letter with me rescinding the veto of the annual budget.

Keizra Mecklai”

This email was sent to Chief Justice Dana Raphael, Mr. Guarco, Mr. Lockhead, and Mr. Hopkins at 10:29PM EDT, April 25, 2016, which was *after* this case had already been decided.

Again, implicitly giving the aforementioned majority opinion permits rescinding a veto. Just as there is no Constitutional provision that allows for a line-item veto, there is no Constitutional provision that allows for the rescission of a veto. First and foremost, this creates several problems. When a law is enacted by the Senate and transmitted to the President, the President may choose to ignore the law (and in 5 days it will automatically vest), the President may sign the law (in which case it comes into force as soon as the act is signed), or the President may veto the law. If the President vetoes the law, according to the Constitution, the law stands before the Senate, in which case “the act shall not take effect unless subsequently passed by a two-thirds vote of the Senate to override the veto” (Article 4, §5.3 of the Constitution). Therefore, after the veto was issued by President Mecklai (*Appendix 2, 3*), there is no procedure for rescinding the veto (*Appendix 4*). The act is dead and before the Senate. What is there to “anti-veto?” What are the limits to this “anti-veto?” Does the time limit still stay in place or can the President go back and “anti-veto” anything from the past? This entire process has now been constructed by the Judiciary, especially since the recession of the veto was prompted *after* the Judiciary had rendered a decision. The Judiciary has inserted an entire procedure into the Constitution, again

dispensing of the normal democratic measures that amending the Constitution normally requires.

Conclusion & Final Thoughts

There were many good points and interesting legal questions raised, such as the unicuity or atomicity of the annual budget (i.e. is the annual budget simply the ledger of several other statutes already passed, or is it *per se* a legislative act that actually dictates the spending of funds). However, because of the complications and several unresolved legal questions, it is impossible to properly decide this case.

So many new, probably unconstitutional, and strange things occurred, it is hard to even make a proper judicial and legal opinion on a substantial basis. The current majority opinion simply ignores most of what has happened in favor of a false mirage of simplicity, providing the significant collateral damage of inventing not one, but *two* new Constitutional procedures. It tries to compact everything into the lens of “line-item vetoes,” but by the opinion’s own admission, there was no real conflict as both sides stipulated that a line-item veto is perhaps not permissible. The real presentation given by Mecklai was that the annual budget is simply an aggregation, while the individual budgetary statutes provide for the actual disbursement of funds. This is not sufficiently answered by the majority opinion, and still remains an interesting question. The majority technically stated that it didn’t answer it, but by considering Mecklai’s actions a line-item veto, it does implicitly assume that the Annual Budget functions as a whole piece of legislation *per se*, and thus does in fact answer that question.

The judiciary should simply dispense this case, which it already did. The first (and only legitimate) ruling should stand, and this entire matter should be left to the Senate.

Frankly, I do not know what the legal status is, and I do not know what the legal status of this opinion is. I am going to proceed for the sake of familiarity:

I respectfully dissent.

Appendix 1



Keizra Mecklai
President
Duke Student Government

John Guarco
Executive Vice President
Duke Student Government

April 24, 2016

DECLARATION OF VETO

To the Executive Vice President,

I hereby submit this letter as formal declaration of my decision to exercise the executive veto as granted by section 4, clause 8 of the Constitution regarding:

Chanticleer \$20,000

in the 2016-2017 Annual Budget approved on April 20, 2016.

Sincerely,
Keizra Mecklai

A handwritten signature in blue ink that reads "Mecklai".

Signed

A handwritten date in blue ink that reads "4/24/16".

Date

Appendix 2



Keizra Mecklai
President
Duke Student Government

John Guarco
Executive Vice President
Duke Student Government

April 25, 2016

DECLARATION OF VETO

To the Executive Vice President,

I hereby submit this letter as formal declaration of my decision to exercise the executive veto as granted by section 4, clause 8 of the Constitution regarding:

Chanticleer \$20,000

in the 2016-2017 Annual Budget approved on April 20, 2016.

JUSTIFICATION:

1. The referendum was misleading.
 - a. The text of the referendum reads: Option 1: Every senior would automatically get a free yearbook, which would be funded by the student activities fee. Roughly \$14 of each student's annual student activities fee would fund the yearbooks for the senior class, with each senior paying a total of \$56 over the course of four years at Duke for their yearbook. There would be no increase in the current student activities fee. Non-seniors could choose to purchase a yearbook any given year for \$56 each.

Option 2: All students would have the choice of purchasing a yearbook for \$120 in any given year. Students would not be required to purchase a yearbook. The \$14 per student in annual student activities fees that would have funded the yearbook would instead go to fund other campus programs and activities."

- b. The phrase "every senior would automatically get a free yearbook" implies that if students were to vote for this option and the senate took that advice that the students who voted for it would ultimately get a free yearbook when they graduate in 1, 2, or 3 years.
 - c. The funding that the senate voted for only funds the chanticleer for two years. Since the chanticleer is using their surplus funds to cover much of the cost of the books for the next two years, DSG was only asked for \$40,000. In two years when the Chanticleer asks for funding again, they will be asking for \$70,000 each year to cover free books for the entire senior class.
 - d. Since this vote to fund the Chanticleer, which only asked for \$20,000 out of annual budget (the other \$20,000 came from DSG surplus), was so contentious and only passed by one vote, I do not believe that the DSG senate would approve \$70,000 to be taken out of the annual budget in two years when these funds run out (and in every year after that). Therefore, about 40% of students who voted to get a free yearbook (40% of the voters were first years) will be paying their student activities fees for the class of 2017 and class of 2018 to get free yearbooks, while they are unlikely to get them.
 - e. This wording was coercive because it implied that as long as DSG funds the Chanticleer this year based on the referendum information that the Chanticleer will be free for all students who voted in the current election when they become seniors. This is simply not the case.
2. The funding of the Chanticleer will negatively impact programming
 - a. SOFC gets allocated about \$700,000 a year to fund all student groups through annual budget and programming requests. Any money that is not allocated during annual budget gets placed into the programming account for SOFC to allocate throughout the year.
 - b. SOFC chair Nikhil Gavai has noted that despite the Student Activities fee remaining fairly constant, the number of requests to SOFC for annual budget and programming funds has increased steadily over the last three years. This means that it is becoming more and more difficult for student groups to get funding from SOFC. Student groups can no longer depend on SOFC to fund events that they funded in the past.
 - c. An additional \$20,000 spent in annual budget is \$20,000 that can no longer be allocated during programming. Student groups fight for sums as low as a couple hundred dollars, and this expenditure would force SOFC to reject 100 such requests.
 - d. What is even more egregious, however, is when the senate will have to discuss the renewal of the chanticleer in two years (the money that would pay for the class of 2019's books), they won't be discussing taking \$20,000 out of programming, they will be talking about taking \$70,000 out, which is 10% of all of the money that SOFC gets to fund all student groups during annual budget and programming.
 - e. There is a reason why the committee that has the most information on funding student groups rejected the Chanticleer's request. Small student groups and their events will suffer because of this funding, not only this year but in future years if DSG feels obligated to continue to fund the book.

Sincerely,
Keizra Mecklai

Signed

4/25/16

Date

Appendix 3



Keizra Mecklai
President
Duke Student Government

John Guarco
Executive Vice President
Duke Student Government

April 25, 2016

DECLARATION OF VETO

To the Executive Vice President,

I hereby submit this letter as formal declaration of my decision to exercise the executive veto as granted by section 4, clause 8 of the Constitution regarding:

The 2016-2017 Annual Budget approved on April 20, 2016.

JUSTIFICATION: The approval of the Chanticleer funding was so egregious that the 2016-2017 annual budget must be reconsidered.

1. The referendum was misleading.

- a. The text of the referendum reads: Option 1: Every senior would automatically get a free yearbook, which would be funded by the student activities fee. Roughly \$14 of each student's annual student activities fee would fund the yearbooks for the senior class, with each senior paying a total of \$56 over the course of four years at Duke for their yearbook. There would be no increase in the current student activities fee. Non-seniors could choose to purchase a yearbook any given year for \$56 each.

Option 2: All students would have the choice of purchasing a yearbook for \$120 in any given year. Students would not be required to purchase a yearbook. The \$14 per student in annual student activities fees that would have funded the yearbook would instead go to fund other campus programs and activities."

- b. The phrase "every senior would automatically get a free yearbook" implies that if students were to vote for this option and the senate took that advice that the

students who voted for it would ultimately get a free yearbook when they graduate in 1, 2, or 3 years.

- c. The funding that the senate voted for only funds the chanticleer for two years. Since the chanticleer is using their surplus funds to cover much of the cost of the books for the next two years, DSG was only asked for \$40,000. In two years when the Chanticleer asks for funding again, they will be asking for \$70,000 each year to cover free books for the entire senior class.
- d. Since this vote to fund the Chanticleer, which only asked for \$20,000 out of annual budget (the other \$20,000 came from DSG surplus), was so contentious and only passed by one vote, I do not believe that the DSG senate would approve \$70,000 to be taken out of the annual budget in two years when these funds run out (and in every year after that). Therefore, about 40% of students who voted to get a free yearbook (40% of the voters were first years) will be paying their student activities fees for the class of 2017 and class of 2018 to get free yearbooks, while they are unlikely to get them.
- e. This wording was coercive because it implied that as long as DSG funds the Chanticleer this year based on the referendum information that the Chanticleer will be free for all students who voted in the current election when they become seniors. This is simply not the case.
2. The funding of the Chanticleer will negatively impact programming
- a. SOFC gets allocated about \$700,000 a year to fund all student groups through annual budget and programming requests. Any money that is not allocated during annual budget gets placed into the programming account for SOFC to allocate throughout the year.
- b. SOFC chair Nikhil Gavai has noted that despite the Student Activities fee remaining fairly constant, the number of requests to SOFC for annual budget and programming funds has increased steadily over the last three years. This means that it is becoming more and more difficult for student groups to get funding from SOFC. Student groups can no longer depend on SOFC to fund events that they funded in the past.
- c. An additional \$20,000 spent in annual budget is \$20,000 that can no longer be allocated during programming. Student groups fight for sums as low as a couple hundred dollars, and this expenditure would force SOFC to reject 100 such requests.
- d. What is even more egregious, however, is when the senate will have to discuss the renewal of the chanticleer in two years (the money that would pay for the class of 2019's books), they won't be discussing taking \$20,000 out of programming, they will be talking about taking \$70,000 out, which is 10% of all of the money that SOFC gets to fund all student groups during annual budget and programming.
- e. There is a reason why the committee that has the most information on funding student groups rejected the Chanticleer's request. Small student groups and their events will suffer because of this funding, not only this year but in future years if DSG feels obligated to continue to fund the book.

Sincerely,
Keizra Mecklai

Signed

4/25/16

Date

Appendix 4



Keizra Mecklai
President
Duke Student Government

John Guarco
Executive Vice President
Duke Student Government

April 25, 2016

I HEREBY RESCIND THE FOLLOWING:

DECLARATION OF VETO

To the Executive Vice President,

I hereby submit this letter as formal declaration of my decision to exercise the executive veto as granted by section 4, clause 8 of the Constitution regarding:

The 2016-2017 Annual Budget approved on April 20, 2016.

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1. The referendum was misleading.
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Option 2: All students would have the choice of purchasing a yearbook for \$120 in any given year. Students would not be required to purchase a yearbook. The \$14 per student in annual student activities fees that would have funded the yearbook would instead go to fund other campus programs and activities."

- b. The phrase "every senior would automatically get a free yearbook" implies that if students were to vote for this option and the senate took that advice that the students who voted for it would ultimately get a free yearbook when they graduate in 1, 2, or 3 years.
 - c. The funding that the senate voted for only funds the chanticleer for two years. Since the chanticleer is using their surplus funds to cover much of the cost of the books for the next two years, DSG was only asked for \$40,000. In two years when the Chanticleer asks for funding again, they will be asking for \$70,000 each year to cover free books for the entire senior class.
 - d. Since this vote to fund the Chanticleer, which only asked for \$20,000 out of annual budget (the other \$20,000 came from DSG surplus), was so contentious and only passed by one vote, I do not believe that the DSG senate would approve \$70,000 to be taken out of the annual budget in two years when these funds run out (and in every year after that). Therefore, about 40% of students who voted to get a free yearbook (40% of the voters were first years) will be paying their student activities fees for the class of 2017 and class of 2018 to get free yearbooks, while they are unlikely to get them.
 - e. This wording was coercive because it implied that as long as DSG funds the Chanticleer this year based on the referendum information that the Chanticleer will be free for all students who voted in the current election when they become seniors. This is simply not the case.
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 - c. An additional \$20,000 spent in annual budget is \$20,000 that can no longer be allocated during programming. Student groups fight for sums as low as a couple hundred dollars, and this expenditure would force SOFC to reject 100 such requests.
 - d. What is even more egregious, however, is when the senate will have to discuss the renewal of the chanticleer in two years (the money that would pay for the class of 2019's books), they won't be discussing taking \$20,000 out of programming, they will be talking about taking \$70,000 out, which is 10% of all of the money that SOFC gets to fund all student groups during annual budget and programming.
 - e. There is a reason why the committee that has the most information on funding student groups rejected the Chanticleer's request. Small student groups and their events will suffer because of this funding, not only this year but in future years if DSG feels obligated to continue to fund the book.

Sincerely,
Keizra Mecklai

A handwritten signature in blue ink that reads "Keizra Mecklai".

Signed _____

4/25/16

Date _____