

Reply Brief to Complaint Three
Madeline Garcia
Arianna Hoye

Good afternoon,

I see many falsehoods stated in Complaint Three. I received Complaint Three with shock, as I remember this week immediately before spring break quite well. I was first unsure which day said meeting between myself and College Democrats occurred, Tuesday (March 10) or Wednesday (March 11), as Tuesday, March 11 is not a 2020 date, nor did I attend a meeting with anyone from College Democrats during this week.

Tuesday March 10th evening, I got off work at 5:00 pm at the Office of Scholarships and immediately went to the Indiana Memorial Union, arriving about 5:20 pm to study for a bit before meeting for my role in IUSG Executive branch. This is verified in Photos 1+2. I took meeting minutes, as I always do, at the IUSG Executive meeting, which can also be evidence of my location at this time. After the two-part meeting (usually from 6-7 for Executive Team, and 7--9 pm for Cabinet) ended early around 8:20, I immediately proceeded to my residence for the night, arriving at 8:35 pm. On Wednesday, March 11, I arrived home after my second class and elected to skip class for the evening, as my work shifts later in the evening had been cancelled, and I was feeling unwell. This is confirmed by both my Google Maps and iPhone location history, that show I arrived home about 3:50 pm and stayed in my home until 8:02 am the next morning of Thursday, March 12. I, Madeline Garcia, deny being present for a meeting on either Tuesday, March 10 or Wednesday, March 11 with College Democrats.

After asking my present and current campaign team members, I can confirm that a meeting had occurred between three members of College Democrats and two members of the campaign team developing, Maddie Dederichs and Geneva Mazhandu. Only the two of them did meet with members of the College Democrats. The meeting appeared to take place on Tuesday, March 10, at 5:30 pm in the SPEA Atrium. Again, I was not present at the meeting and was at the IMU at this time, nor did I join remotely or otherwise know about this meeting until much later. Both Dederichs and Mazhandu confirmed that they **did not ask for an endorsement of the ticket at this time** (see Photos below). Evann Englert, Allyson McBride, and Allesia Modjarrad, all present at the meeting, also affirmed that they did not hear Defy staffers ask for an endorsement at all. Dederichs explained that the meeting's purpose was **to gauge how IUSG as a whole and a reflection of the current state could better serve student organizations like College Democrats**. The purpose was to hear out student voices, not secure support or votes for a campaign. This was confirmed by Alessia Modjarrad, who said, "I remember Evann telling me it was a meeting about the iu dems [sic] perspective about life on campus and that's what the topic

we stayed on!” This is also confirmed by Allyson McBride in Photo 15, “We just talked about ways IUSG could better support student orgs.”

Excluded from the facts submitted in the Complaint Three, Evann Englert (Vice President of College Democrats) was also at the meeting, and this is confirmed by both Englert and Dederichs. Englert confirmed that the purpose of the meeting was “[Maddie and Geneva] just wanted to talk about how IUSG could help student orgs like Dems.” He went on to say, “No one asked for an endorsement.” Englert also confirmed that Alessia Modjarrad and Allyson McBride were there at the meeting, and that Samantha Waterman was not. Beyond this, the purpose and contents of this meeting are grossly misrepresented in Complaint Three. Mazhandu took notes during the meeting, which I found saved in our Google Drive, and have screenshotted below. The notes do not suggest anything about asking for an endorsement or building a coalition for support of Defy or any conversation about a publicly facing campaign in any way. The purpose and content of the meeting were precisely what Complaint Three said it was not, which was for operational considerations - simply hearing a student organization’s perspective to help the team consider different ideas when they would draft policies much later.

When College Democrats did go through the process of selecting a candidate to endorse, they held Zoom meetings with both campaigns and chose through this process. The conversations with us about the potential for endorsement (and the resulting endorsement) did not occur until March 27th, and we understood that the Inspire campaign had their meeting with College Democrats on Saturday, March 28th.

Overall, there are many inaccuracies in Complaint Three, and the Defy campaign staff did not violate Section 510 or Section 604 of the Election Code. To start, the date of the meeting was Tuesday, March 10. **I, Madeline Garcia, was not present for said meeting**, as you can see in my detailed accounts. Maddie Dederichs, Geneva Mazhandu, Alessia Modjarrad, and Allyson McBride were present for the meeting. Evann Englert, Vice President of College Democrats, was also in attendance at the meeting. The meeting’s purpose was never set to secure votes or support for what would become the Defy campaign. Defy representatives **never asked for an endorsement** in this meeting. The meeting was conducted with the purpose of hearing College Democrats’ perspective on campus life and IUSG engagement issues, but there was **no context of supporting the Defy campaign any sort of public advertisement for a campaign at this time**. The accounts of all five testimonies I have sought, which are documented below in screenshots, prove these statements to be true. I will be happy to release further testimony from these individuals if it is requested.

Thank you. All violations, we deny.

Signed: Madeline G. Garcia

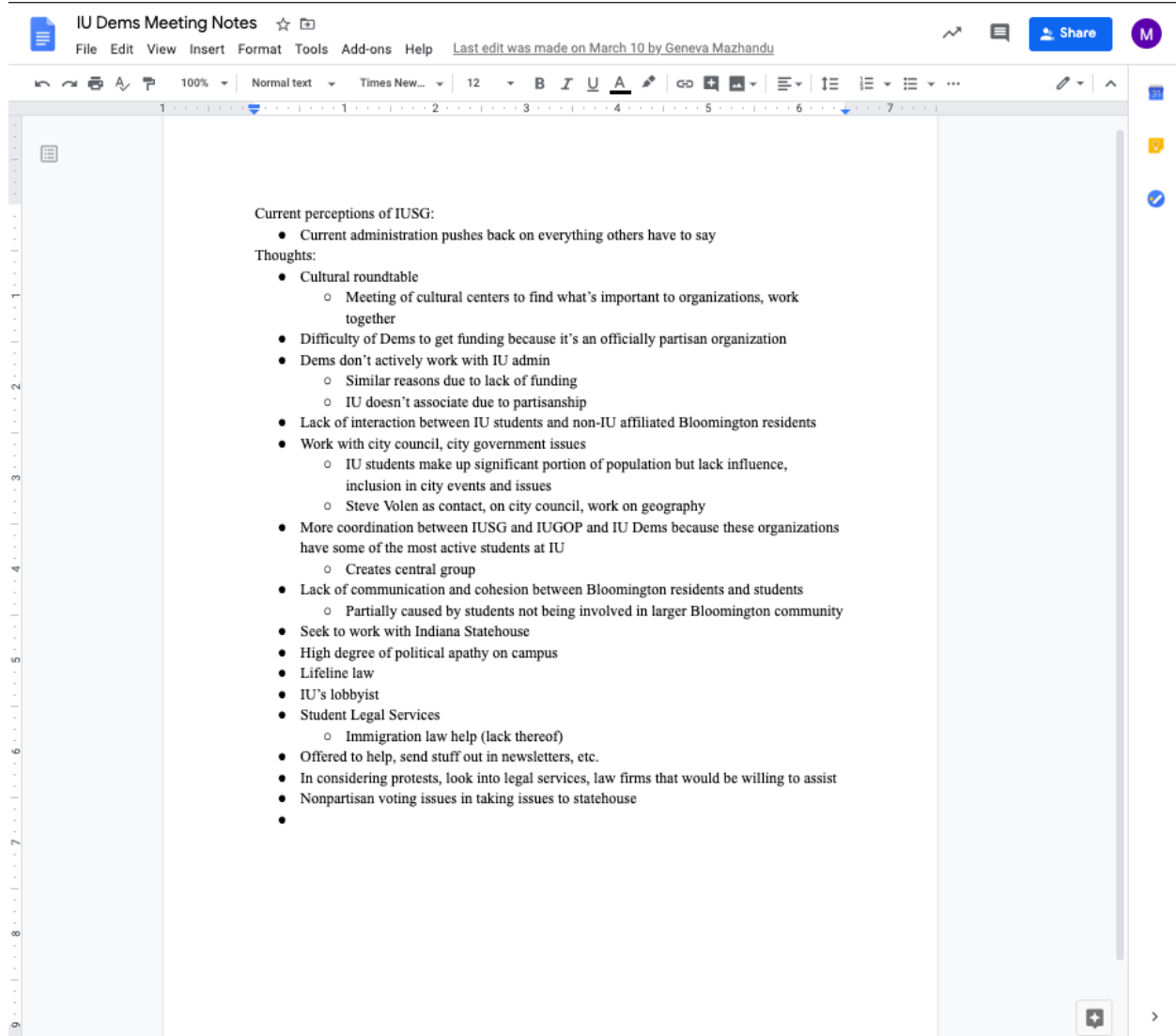
Photo 1 and 2: My Google Timeline history from Tuesday, March 10. I had class at SPEA (O'Neill) in the morning between 8:00 and 10:45 am, but never returned here for a meeting with College Democrats or at any other point in the day. The only other locations I went to this day, as evidenced by this map, are my employment office at the Office of Scholarships, the Indiana Memorial Union, and my home south of campus.

PICTURES REMOVED FOR PUBLIC RELEASE BY THE IUSG ELECTION COMMISSION

Photos 3, 4, 5: My Google Timeline History from Wed, March 11 and iPhone Location from my home on Dunn St.:

PICTURES REMOVED FOR PUBLIC RELEASE BY THE IUSG ELECTION COMMISSION

Photo 6: Meeting Notes from Geneva Mazhandu in the meeting - as you can see the last edit made was March 10 by Geneva Mazhandu



The image shows a screenshot of a Google Docs document titled "IU Dems Meeting Notes". The document is edited by Geneva Mazhandu, with the last edit made on March 10. The content of the document is as follows:

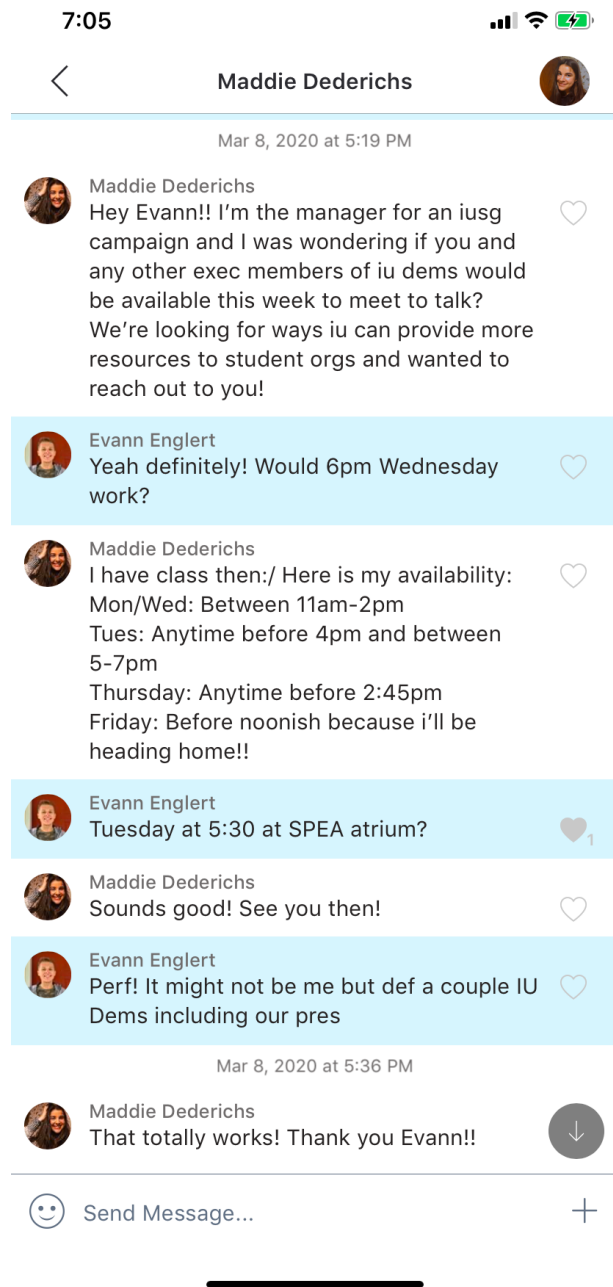
Current perceptions of IUSG:

- Current administration pushes back on everything others have to say

Thoughts:

- Cultural roundtable
 - Meeting of cultural centers to find what's important to organizations, work together
- Difficulty of Dems to get funding because it's an officially partisan organization
- Dems don't actively work with IU admin
 - Similar reasons due to lack of funding
 - IU doesn't associate due to partisanship
- Lack of interaction between IU students and non-IU affiliated Bloomington residents
- Work with city council, city government issues
 - IU students make up significant portion of population but lack influence, inclusion in city events and issues
 - Steve Volen as contact, on city council, work on geography
- More coordination between IUSG and IUGOP and IU Dems because these organizations have some of the most active students at IU
 - Creates central group
- Lack of communication and cohesion between Bloomington residents and students
 - Partially caused by students not being involved in larger Bloomington community
- Seek to work with Indiana Statehouse
- High degree of political apathy on campus
- Lifeline law
- IU's lobbyist
- Student Legal Services
 - Immigration law help (lack thereof)
- Offered to help, send stuff out in newsletters, etc.
- In considering protests, look into legal services, law firms that would be willing to assist
- Nonpartisan voting issues in taking issues to statehouse
-

Photo 7: Evann Englert, an affiliate of College Democrats, sharing the details of the meeting in a conversation with Maddie Dederichs:



Photos 8 and 9: Maddie Dederichs' side of the messages to set up the meeting with Evann Englert, and proof that Englert attended the meeting:

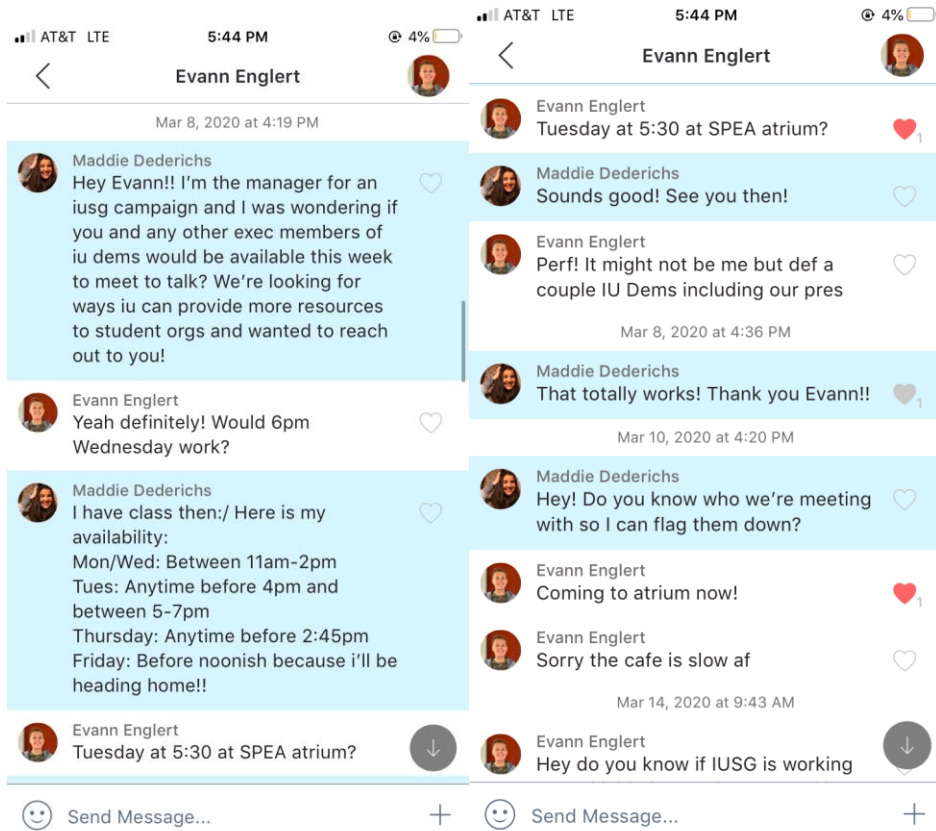


Photo 10 and 11: Madeline Garcia's texts with Evann Englert to confirm details of the meeting:

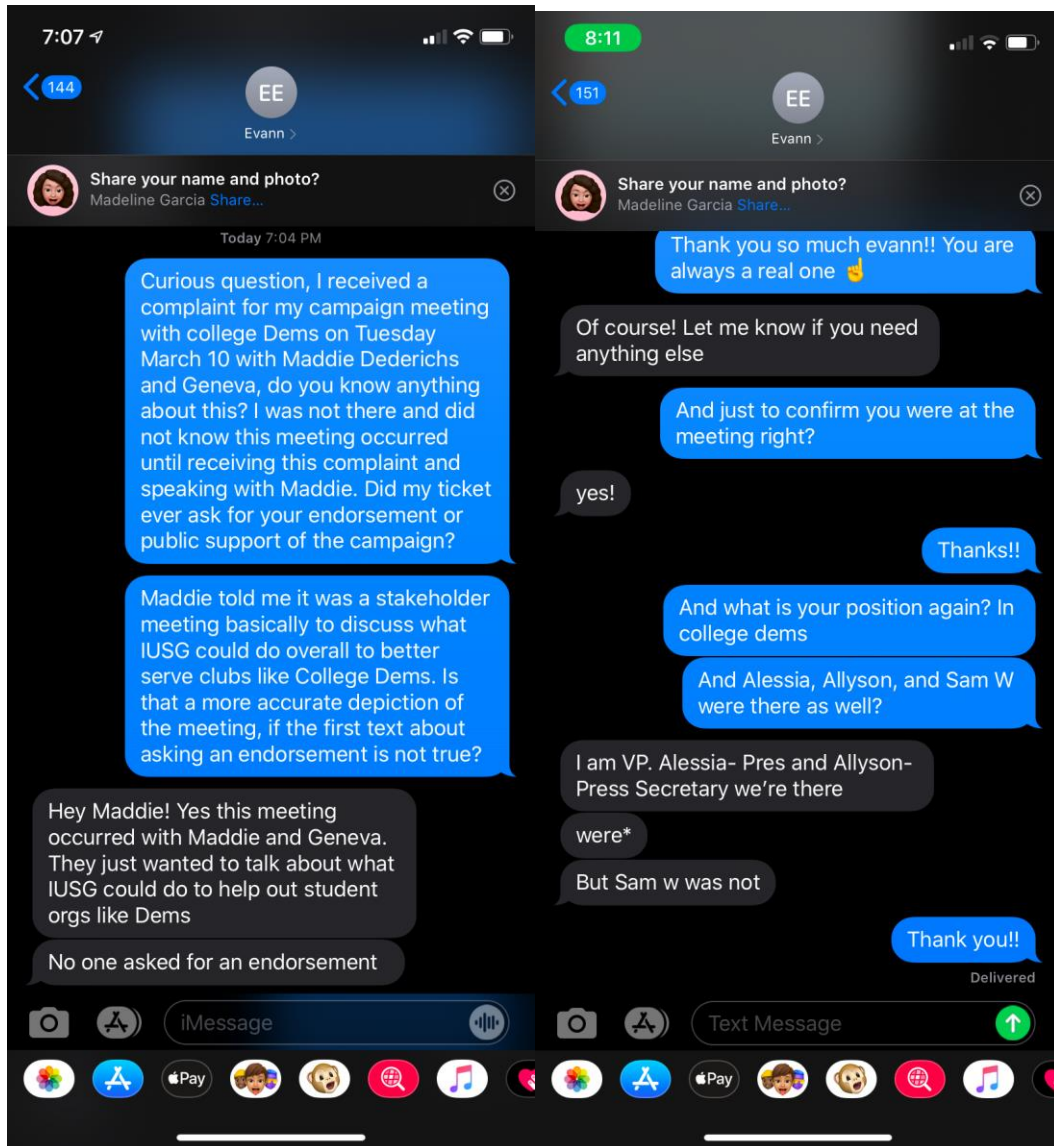


Photo 12: Madeline Garcia's DM with Alessia Modgarrad, President of the College Democrats:



Photo 13: Madeline Garcia's texts with Maddie Dederichs, a former Defy campaign staff member who was in attendance at this meeting with College Democrats.

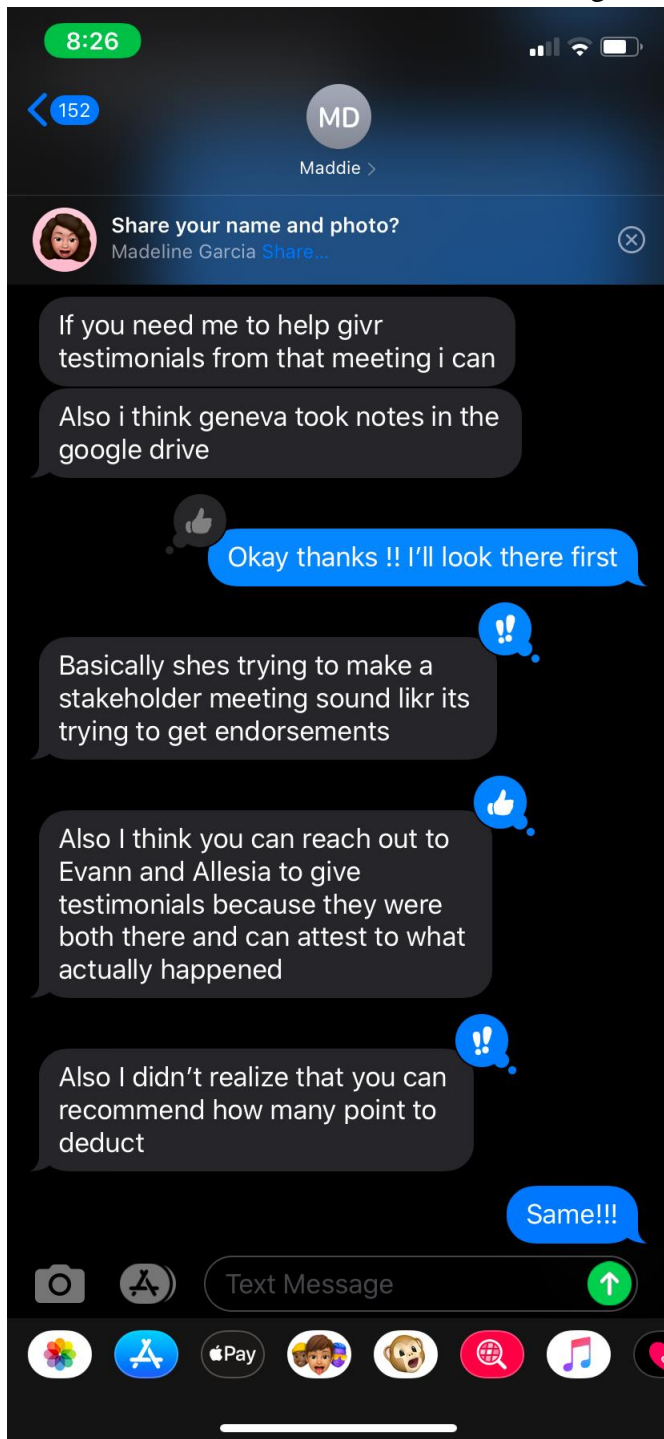


Photo 14: Madeline Garcia's texts with Geneva Mazhandu, a Defy staff member who was in attendance at this meeting with College Democrats.

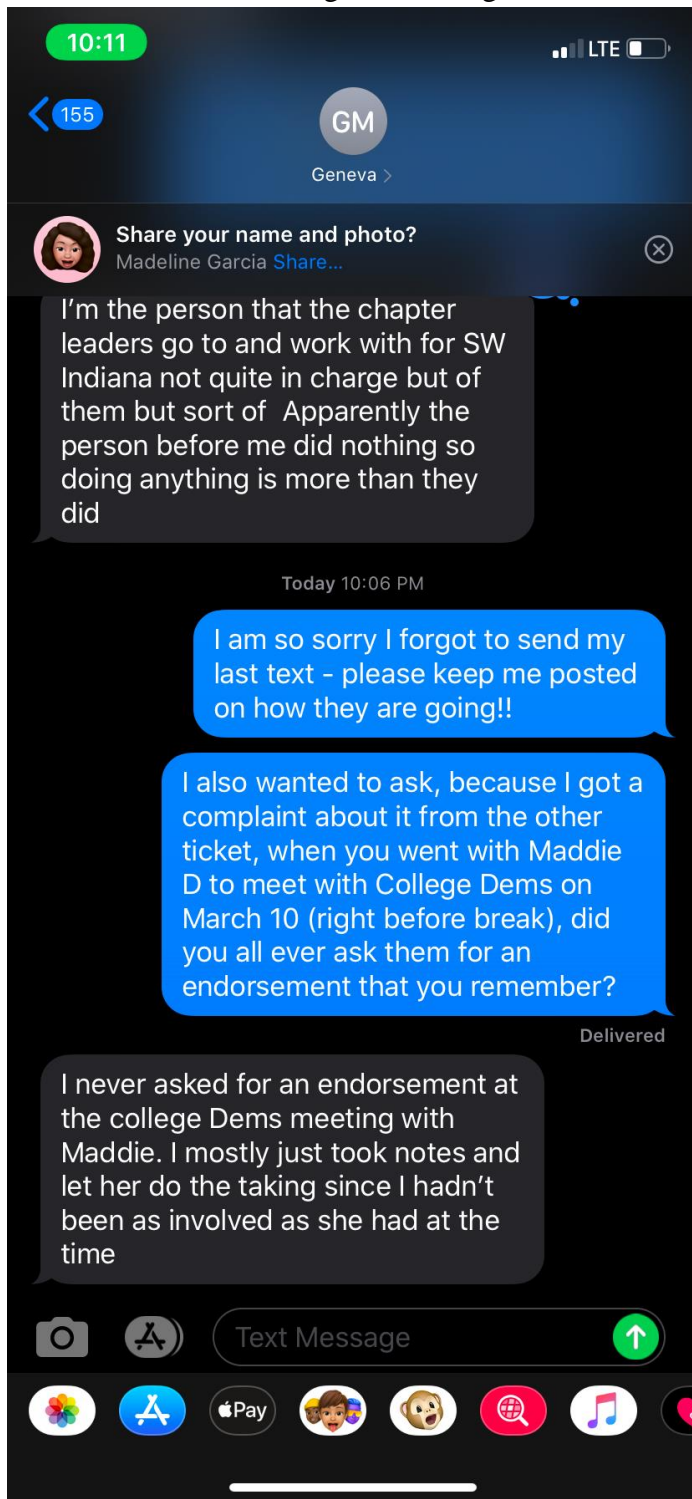


Photo 15: Madeline Garcia's DM with Allyson McBride, who was also at the meeting and representing College Democrats, who confirmed the topic of the meeting and that no endorsement had occurred.

