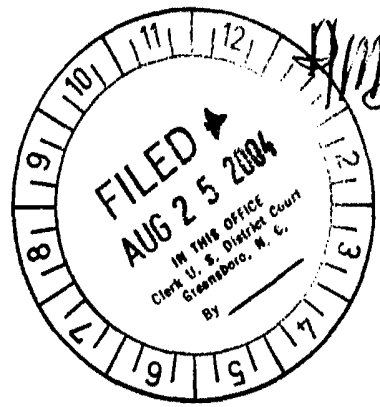


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



**ALPHA IOTA OMEGA CHRISTIAN
FRATERNITY, an unincorporated association;
TREVOR J. HAMM, an individual; and
CARLON D. MYRICK, an individual,**

Plaintiffs,

v.

**JAMES MOESER, Chancellor of the University
of North Carolina at Chapel Hill; RICHARD T.
WILLIAMS, Chairman and member, Board of
Trustees of the University of North Carolina at
Chapel Hill; NELSON SCHWAB III, Vice
Chairman and member, Board of Trustees of the
University of North Carolina at Chapel Hill;
JEAN ALMAND KITCHIN, Secretary and
member, Board of Trustees of the University of
North Carolina at Chapel Hill; TIMOTHY B.
BURNETT; PHILIP G. CARSON; RUSSELL M.
CARTER; JOHN G. B. ELLISON, JR.; PAUL
FULTON, JR.; KAROL V. MASON; ROGER L.
PERRY, SR.; A. DONALD STALLINGS;
ROBERT W. WINSTON III; members, Board of
Trustees of the University of North Carolina at
Chapel Hill; JONATHAN CURTIS, Assistant
Director of Student Affairs and Organizations,
University of North Carolina at Chapel Hill;
MOLLY CORBETT BROAD, President,
University of North Carolina; J. BRADLEY
WILSON, Chair and member, Board of
Governors of the University of North Carolina; J.
CRAIG SOUZA, Vice Chairman and member,
Board of Governors of the University of North
Carolina; PATSY B. PERRY, Secretary and
member, Board of Governors of the University of
North Carolina; BRADLEY T. ADCOCK; G.
IRVIN ALDRIDGE; JAMES G. BABB; BRENT
D. BARRINGER; J. ADDISON BELL; R.
STEVE BOWDEN; F. EDWARD
BROADWELL, JR.; WILLIAM L. BURNS, JR.;**

CASE NO. _____

1:04CV00765

**VERIFIED COMPLAINT FOR
INJUNCTIVE AND DECLARATORY
RELIEF AND NOMINAL DAMAGES**

ANNE W. CATES; JOHN F.A.V. CECIL; BERT §
 COLLINS; JOHN W. DAVIS III; RAY S. §
 FARRIS; DUDLEY E. FLOOD; HANNAH D. §
 GAGE; WILLIE J. GILCHRIST; H. FRANK §
 GRAINGER; PETER D. HANS; PETER §
 KEBER; ADELAIDE DANIELS KEY; G. §
 LEROY LAIL; CHARLES H. MERCER, JR.; §
 CHARLES S. NORWOOD; CARY C. OWEN; §
 JIM W. PHILLIPS, JR.; GLADYS ASHE §
 ROBINSON; ESTELLE “BUNNY” SANDERS; §
 PRISCILLA P. TAYLOR; and ROBERT F. §
 WARWICK, members, Board of Governors of §
 the University of North Carolina; each in their §
 official capacities, §
 §
 §
 §
 Defendants. §

Come now the Plaintiffs, through their attorneys and pursuant to the Federal Rules of Civil Procedure, and for their causes of action against Defendants aver the following:

I.

INTRODUCTION

1. This case is a federal civil rights action against officials of the University of North Carolina brought by a fraternity and two of its members who are students at the University of North Carolina at Chapel Hill. Members and officers of the Alpha Iota Omega Christian Fraternity must be Christians and adhere to a statement of faith. Thus, Plaintiffs have refused on First Amendment grounds to sign the University’s Policy on Non-Discrimination as a condition of receiving official recognition from the University. As a result, the University has denied the fraternity official recognition and its accompanying benefits and privileges, including the right to use University facilities, property, services or equipment for meetings; to use the University name; to apply for funding from the Student Activities Fee; and the right to seek assistance from

the Division of Student Affairs. The University of North Carolina's policy violates the First and Fourteenth Amendments to the United States Constitution.

II.

JURISDICTION AND VENUE

2. This action arises under the United States Constitution, particularly the First and Fourteenth Amendments; and under federal law, particularly 42 U.S.C. §§ 1983 and 1988.

3. This Court has original jurisdiction over these federal claims by operation of 28 U.S.C. §§ 1331 and 1343.

4. This Court has authority to issue the requested declaratory relief under 28 U.S.C. § 2201.

5. This Court has authority to issue the requested injunctive relief under 28 U.S.C. § 1343(a)(3).

6. This Court is authorized to award the requested damages under 28 U.S.C. § 1343(a)(3).

7. This Court is authorized to award attorneys fees under 42 U.S.C. § 1988.

8. Venue is proper in the United States District Court for the Middle District of North Carolina under 28 U.S.C. § 1391(b) in that a substantial part of the events giving rise to the claim occurred within the District.

III.

IDENTIFICATION OF THE PLAINTIFFS

9. Alpha Iota Omega Christian Fraternity ("AIO") is, and was at all times relevant to this Complaint, an unincorporated student organization of the University of North Carolina at

Chapel Hill (“UNC-CH”). It is capable of suing in its own name.

10. Trevor J. Hamm is, and was at all times relevant to this Complaint, a student at the University and president of the AIO chapter at the UNC-CH.

11. Carlton D. Myrick is, and was at all times relevant to this Complaint, a student at the University and a member of the AIO chapter at the UNC-CH.

IV.

IDENTIFICATION OF THE DEFENDANTS

12. James Moeser is, and was at all times relevant to this Complaint, Chancellor of the UNC-CH. This Defendant’s duties include, among others, the oversight of the UNC-CH and the execution of policies that govern that University.

13. Richard T. Williams is, and was at all times relevant to this Complaint, Chairman and member of the Board of Trustees of the UNC-CH. This Defendant’s duties include, among others, the adoption of policies that govern UNC-CH.

14. Nelson Schwab III is, and was at all times relevant to this Complaint, Vice Chairman and member of the Board of Trustees of the UNC-CH. This Defendant’s duties include, among others, the adoption of policies that govern UNC-CH.

15. Jean Almand Kitchin, is, and was at all times relevant to this Complaint, Secretary and member of the Board of Trustees of the UNC-CH. This Defendant’s duties include, among others, the adoption of policies that govern UNC-CH.

16. Timothy B. Burnett is, and was at all times relevant to this Complaint, a member of the Board of Trustees of the UNC-CH. This Defendant’s duties include, among others, the adoption of policies that govern UNC-CH.

17. Philip G. Carson is, and was at all times relevant to this Complaint, a member of the Board of Trustees of the UNC-CH. This Defendant's duties include, among others, the adoption of policies that govern UNC-CH.

18. Russell M. Carter is, and was at all times relevant to this Complaint, a member of the Board of Trustees of the UNC-CH. This Defendant's duties include, among others, the adoption of policies that govern UNC-CH.

19. John G. B. Ellison, Jr. is, and was at all times relevant to this Complaint, a member of the Board of Trustees of the UNC-CH. This Defendant's duties include, among others, the adoption of policies that govern UNC-CH.

20. Paul Fulton, Jr. is, and was at all times relevant to this Complaint, a member of the Board of Trustees of the UNC-CH. This Defendant's duties include, among others, the adoption of policies that govern UNC-CH.

21. Karol V. Mason is, and was at all times relevant to this Complaint, a member of the Board of Trustees of the UNC-CH. This Defendant's duties include, among others, the adoption of policies that govern UNC-CH.

22. Roger L. Perry, Sr. is, and was at all times relevant to this Complaint, a member of the Board of Trustees of the UNC-CH. This Defendant's duties include, among others, the adoption of policies that govern UNC-CH.

23. A. Donald Stallings is, and was at all times relevant to this Complaint, a member of the Board of Trustees of the UNC-CH. This Defendant's duties include, among others, the adoption of policies that govern UNC-CH.

24. Robert W. Winston III is, and was at all times relevant to this Complaint, a member of the Board of Trustees of the UNC-CH. This Defendant's duties include, among others, the adoption of policies that govern UNC-CH.

25. Jonathan Curtis is, and was at all times relevant to this Complaint, the Assistant Director of Student Affairs and Organizations, UNC-CH. This Defendant's duties include, among others, the oversight of the official recognition process for student organizations at the UNC-CH and the application of University policies to those student organizations.

26. Molly Corbett Broad is, and was at all times relevant to this Complaint, the President of the University of North Carolina ("UNC"). This Defendant's duties include, among others, executing the policies of the UNC.

27. J. Bradley Wilson is, and was at all times relevant to this Complaint, Chair and member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

28. J. Craig Souza is, and was at all times relevant to this Complaint, Vice Chair and member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

29. Patsy B. Perry is, and was at all times relevant to this Complaint, Secretary and member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

30. Bradley T. Adcock is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

31. G. Irvin Aldridge is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

32. James G. Babb is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

33. Brent D. Barringer is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

34. J. Addison Bell is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

35. R. Steve Bowden is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

36. F. Edward Broadwell, Jr. is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

37. William L. Burns, Jr. is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

38. Anne W. Cates is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

39. John F.A.V. Cecil is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

40. Bert Collins is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

41. John W. Davis III is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

42. Ray S. Farris is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

43. Dudley E. Flood is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

44. Hannah D. Gage is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

45. Willie J. Gilchrist is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

46. H. Frank Grainger is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

47. Peter D. Hans is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

48. Peter Keber is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

49. Adelaide Daniels Key is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

50. G. Lerory Lail is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

51. Charles H. Mercer, Jr. is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the oversight of the UNC, including the UNC-CH campus, and the adoption of policies that govern the UNC

52. Charles S. Norwood is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

53. Cary C. Owen is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

54. Jim W. Phillips, Jr. is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

55. Gladys Ashe Robinson is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

56. Estelle "Bunny" Sanders is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

57. Priscilla P. Taylor is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

58. Robert F. Warwick is, and was at all times relevant to this Complaint, a member of the Board of Governors of the UNC. This Defendant's duties include, among others, the adoption of policies that govern the UNC, including the UNC-CH campus.

59. Each of these defendants is sued in his or her official capacity only.

V.

STATEMENTS OF FACT

Fraternity Background

60. The Alpha Iota Omega Fraternity ("AIO") is a male fraternity on the UNC-CH campus.

61. Trevor J. Hamm, Carlon D. Myrick, and Jonathan Park are the three current members of AIO at the University.

62. Mr. Hamm is the president of the AIO chapter at the UNC-CH.

63. Mr. Hamm, Mr. Myrick, and Mr. Park are all full-time, registered students at the UNC-CH.

64. The plaintiffs have joined together to promote AIO's goal for undergraduate members to uphold the Great Commission of Jesus Christ by serving members of Greek letter organizations through evangelism and mentorship, both on university campuses and in the greater community.

65. AIO is governed by a constitution. A true and correct copy of AIO's constitution is attached as Exhibit 1.

66. AIO has adopted by-laws. A true and correct copy of AIO's by-laws is attached as Exhibit 2.

67. Specifically, AIO's by-laws provide that:

While Alpha Iota Omega Christian Fraternity, Inc. was established to provide a constructive spiritual environment for college men, membership in this organization shall be open to all male individuals without regard to race, color, national origin, disability, age, or veteran status having met the qualifications described herein. However, due to the explicit Christian purposes and tenets on

which this organization is founded, members shall be selected according to the standards set by the organization, in accordance with the statement of faith.

See Ex. 2 at 1.

68. AIO believes that to achieve success in reaching its religiously-motivated goals of promoting the Christian faith to men belonging to fraternities at UNC-CH, it must require its members and officers to adhere to a Christian statement of faith, Christian tenets of belief, and Christian standards of conduct.

69. AIO's statement of faith is contained on page 3 of its "Undergraduate Manual." A true and correct copy of the Undergraduate Manual is attached as Exhibit 3.

70. AIO's tenets of belief and standards of conduct are also included in its Undergraduate Manual. *Id.* at 4-7.

71. Individuals who refuse to adhere to AIO's statement of faith and Christian standards of conduct are not permitted to be members or officers.

72. It would contradict AIO's expressive and associational purpose to permit individuals who disagree with AIO's statement of faith, tenets of belief, and Christian standards of conduct to serve as officers or members.

73. Among AIO's Christian standards of conduct is the belief that Christian standards of conduct limit sexual conduct to that which takes place in a marriage between one man and one woman. Ex. 3 at 6-7 ("Conviction of Relational Purity").

74. AIO believes that sexual conduct that takes place outside of marriage is contrary to Christian standards of behavior. *Id.*

75. Accordingly, individuals who engage in sexual conduct outside of marriage, whether heterosexual or homosexual, are not permitted to be members or officers of AIO.

76. It would contradict AIO's expressive and associational purpose to permit individuals who fail to adhere to AIO's standards of conduct to serve as officers or members.

University Policies

77. UNC-CH is one of sixteen campuses of the UNC.

78. The UNC Board of Governors adopts policies that govern the UNC and its sixteen campuses, including the UNC-CH.

79. The UNC Board of Governors has delegated authority to the UNC-CH Board of Trustees to make additional policies specific to the UNC-CH campus so long as those additional policies are consistent with the UNC Board of Governors' policies.

80. UNC-CH allows student organizations to apply for official recognition as a UNC-CH student co-curricular organization.

81. Official recognition entitles a student organization to:

- a. reserve UNC-CH facilities, property, services, or equipment;
- b. use the UNC-CH name as part of the organization;
- c. access funding from the Student Activity Fee legislatively apportioned by the Student Congress; and
- d. seek assistance from the Division of Student Affairs, Carolina Legal Services, Inc., and the Student Activities Fund Office.

82. The UNC-CH requires that a student organization seeking official recognition must submit a signed "University Recognition Agreement for UNC-CH Student Co-Curricular Organizations" ("Agreement"). A true and correct copy of an unsigned version of this document is attached as Exhibit 4.

83. The Agreement informs prospective student organizations that it is a “binding agreement between your organization and the University of North Carolina at Chapel Hill.” *Id.*

84. As a condition of official recognition, the Agreement requires that a student organization must, among other things, comply with all UNC and UNC-CH policies, including UNC and UNC-CH policies on non-discrimination. *Id.*

85. Specifically, the Agreement states that “membership and participation in your organization must be open without regard to age, race, color, national origin, religion, disability, veteran status, or sexual orientation.” *Id.*

86. The Agreement states that “[o]fficial recognition does not mean that the University endorses the viewpoints of the organizations.” *Id.*

87. The UNC and the UNC-CH do not endorse the viewpoints of officially-recognized student co-curricular organizations that are considered “University-affiliated.”

88. The Agreement states that “[r]ecognition may be withdrawn or denied should it be determined . . . the organization fails to comply with University policies, including University policies on non-discrimination.” *Id.*

89. Student organizations are provided a hyperlink to the UNC and UNC-CH Policy on Non-Discrimination on the Student Activities and Organizations section of the University’s website.

90. As linked on the Student Activities and Organizations website, the Policy on Non-Discrimination is in the form of a September 6, 2001 memo from Defendant James Moeser to “Deans, Directors, and Department Chairs” (“Non-Discrimination Policy”). A true and correct copy of the Non-Discrimination Policy is attached as Exhibit 5.

91. The Non-Discrimination Policy states in relevant part:

It is our policy with respect to employment terms and conditions and educational programs not to discriminate on the basis of age, sex, race, color, national origin, religion, or disability.

....

In addition, the University has adopted an internal policy on non-discrimination on the basis of sexual orientation. That policy provides that educational and employment decisions should be based on individuals' abilities and qualifications and should not be based on irrelevant factors or personal characteristics that have no connection with academic abilities or job performance. Among the traditional factors which are generally "irrelevant" are age, sex, race, color, national origin, religion, and disability. It is the policy of The University of North Carolina at Chapel Hill that an individual's sexual orientation be treated in the same manner. Such a policy ensures that only relevant factors are considered and that equitable and consistent standards of conduct and performance are applied.

<http://www.unc.edu/campus/policies/nondiscrim.html> (last visited on August 21, 2004); *see also* Ex. 5.

92. The Non-Discrimination Policy reflects the official policy of both the UNC Board of Governors and the UNC-CH Board of Trustees.

93. An exception to the Non-Discrimination Policy is that officially recognized student organizations may be exclusively male or female if exempted under Title IX, 28 U.S.C. § 1681.

94. Student organizations are also provided a hyperlink to the UNC-CH Policy on Sexual Orientation ("Sexual Orientation Policy") on the Student Activities and Organizations portion of the UNC-CH website.

95. The Sexual Orientation Policy states in relevant part:

The University of North Carolina at Chapel Hill believes that educational and employment decisions should be based on individuals' abilities and qualifications and should not be based on irrelevant factors or personal characteristics that have no connection with academic abilities or job performance. Among the traditional factors which are generally "irrelevant" are age, race, color, sex, religion, national origin, and disability. It is the policy of The University of North Carolina at Chapel Hill that an

individual's sexual orientation be treated in the same manner. Such a policy ensures that only relevant factors are considered and that equitable and consistent standards of conduct and performance are applied.

<http://hr.unc.edu/Data/SPA/employeerelations/harassment/sexual-orientation> (last visited on August 21, 2004).

AIO Unrecognized

96. AIO has previously been an officially-recognized, student co-curricular organization at the UNC-CH for a number of years.

97. As a male fraternity, AIO is allowed to limit its membership to males under Title IX.

98. As an officially-recognized organization, AIO had an UNC-CH student organization account and space on the UNC-CH website.

99. In September of 2003, AIO notified Defendant Jonathan Curtis that it would no longer subscribe to the Non-Discrimination and Sexual Orientation Policies to the extent that those policies conflicted with the requirement that all AIO members and officers adhere to a Christian statement of faith, adhere to tenets of belief, and conform to certain standards of conduct.

100. In December 2003, Plaintiff Trevor Hamm attempted to access the AIO portion of the UNC-CH website.

101. UNC-CH had removed AIO's information on the UNC-CH website.

102. UNC-CH had also frozen AIO's student organization account.

103. AIO and its members contacted Defendant Curtis about the AIO website and account.

104. Defendant Curtis informed AIO that AIO's official recognition had been withdrawn by the UNC-CH for AIO's failure to certify its compliance with the Non-Discrimination Policy and the Sexual Orientation Policy.

105. AIO desires official recognition as a student co-curricular organization at the UNC-CH.

106. Plaintiffs object to the Non-Discrimination and Sexual Orientation Policies that require AIO to open its membership and elected positions to all students regardless of religion or sexual orientation.

107. Plaintiffs' objections to the Non-Discrimination and Sexual Orientation Policies stem from their sincerely held religious beliefs.

108. Plaintiffs do not object to the UNC and UNC-CH policies forbidding discrimination on age, race, color, national origin, and disability.

VI.

STATEMENTS OF LAW

109. All alleged acts of the Defendants, their officers, agents, servants, employees, or persons acting at their behest or direction, were done and are continuing to be done under the color of state law, including the statutes, regulations, customs, policies and usages of the State of North Carolina.

110. Plaintiffs challenge Defendants' Non-Discrimination and Sexual Orientation Policies forbidding officially-recognized student co-curricular organizations to discriminate on the basis of religion and sexual orientation, facially and as-applied.

111. Unless and until the enforcement of the Defendants' Non-Discrimination and Sexual Orientation Policies are enjoined, Plaintiffs will suffer and continue to suffer irreparable harm to their constitutional rights.

VII.

FIRST CAUSE OF ACTION: FREEDOM OF ASSOCIATION

112. Plaintiffs reallege all matters set forth in the preceding paragraphs and incorporate them herein by reference.

113. By enacting and enforcing the Non-Discrimination and Sexual Orientation Policies forbidding officially-recognized student co-curricular organizations to discriminate on the basis of religion and sexual orientation, Defendants have unconstitutionally conditioned UNC-CH benefits on Plaintiffs and other student organizations yielding their clearly established right to freedom of association for expressive purposes secured by the First and Fourteenth Amendments to the Constitution.

114. By enacting and enforcing the Non-Discrimination and Sexual Orientation Policies forbidding officially-recognized student co-curricular organizations to discriminate on the basis of religion and sexual orientation, Defendants have deprived Plaintiffs and other student organizations of their clearly established right to freedom of association for expressive purposes secured by the First and Fourteenth Amendments to the Constitution.

115. The Defendants have no compelling reason that would justify the burden imposed upon the association of the Plaintiffs and other student organizations.

WHEREFORE, Plaintiffs respectfully pray that the Court grant the relief set forth hereinafter in the prayer for relief.

VIII.

SECOND CAUSE OF ACTION: FREEDOM OF SPEECH

116. Plaintiffs reallege all matters set forth in the preceding paragraphs and incorporate them herein by reference.

117. Speech, including religious speech, is protected by the First and Fourteenth Amendments to the United States Constitution.

118. A corollary of the right to speak is the right not to speak.

119. By their policies, Defendants are unconstitutionally forcing Plaintiffs to express approval of other religions, non-traditional and meretricious relationships, and homosexual behavior and other sexual activity outside of marriage, or else surrender the privileges granted to them as an officially recognized student organization on campus.

120. By enacting and enforcing the Non-Discrimination and Sexual Orientation Policies forbidding officially-recognized student co-curricular organizations to discriminate on the basis of religion and sexual orientation, Defendants have unconstitutionally conditioned UNC-CH benefits on Plaintiffs and other student organizations yielding their clearly established right to freedom of speech secured by the First and Fourteenth Amendments to the Constitution.

121. By enacting and enforcing the Non-Discrimination and Sexual Orientation Policies forbidding officially-recognized student co-curricular organizations to discriminate on the basis of religion and sexual orientation, Defendants have deprived Plaintiffs and other student organizations of their clearly established right to freedom of speech secured by the First and Fourteenth Amendments to the Constitution.

122. The Defendants have no compelling reason that would justify the burden imposed upon the speech of the Plaintiffs and other student organizations.

WHEREFORE, Plaintiffs respectfully pray that the Court grant the relief set forth hereinafter in the prayer for relief.

IX.

THIRD CAUSE OF ACTION: FREE EXERCISE OF RELIGION

123. Plaintiffs reallege all matters set forth in the preceding paragraphs and incorporate them herein by reference.

124. The wording of Plaintiffs' Constitution, By-Laws and Undergraduate Manual is motivated by their sincerely held religious beliefs.

125. By enacting and enforcing the Non-Discrimination and Sexual Orientation Policies forbidding officially-recognized student co-curricular organizations to discriminate on the basis of religion and sexual orientation, Defendants have unconstitutionally conditioned UNC-CH benefits on Plaintiffs and other student organizations yielding their clearly established right to free exercise of their religion secured by the First and Fourteenth Amendments to the Constitution.

126. By enacting and enforcing the Non-Discrimination and Sexual Orientation Policies forbidding officially-recognized student co-curricular organizations to discriminate on the basis of religion and sexual orientation, Defendants have deprived Plaintiffs and other student organizations of their clearly established right to free exercise of their religion secured by the First and Fourteenth Amendments to the Constitution.

127. The Defendants have no compelling reason that would justify the burden imposed upon the religion of the Plaintiffs and other student organizations.

WHEREFORE, Plaintiffs respectfully pray that the Court grant the relief set forth hereinafter in the prayer for relief.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request the following relief:

A. That this Court preliminary and permanently enjoin the Defendants from enforcing their Non-Discrimination and Sexual Orientation Policies forbidding officially-recognized student co-curricular organization to discriminate on the basis of religion or sexual orientation.

B. That this Court enter declaratory judgment stating that Defendants' Non-Discrimination and Sexual Orientation Policies forbidding officially-recognized student co-curricular organization to discriminate on the basis of religion or sexual orientation are facially unconstitutional and violate students' rights as guaranteed under the First and Fourteenth Amendments to the United States Constitution;

C. In the alternative, that this Court enter a declaratory judgment stating that the Non-Discrimination and Sexual Orientation Policies forbidding officially-recognized student co-curricular organization to discriminate on the basis of religion or sexual orientation are unconstitutional as applied to the Plaintiffs and violate the Plaintiffs' rights guaranteed under the First and Fourteenth Amendments to the United States Constitution;

D. That this Court award Plaintiffs their costs and expenses of this action, including reasonable attorneys' fees under 42 U.S.C. § 1988 and other applicable law;

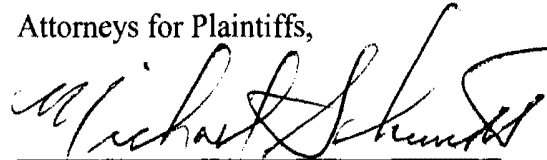
E. That this Court grant such other and further relief as the Court deems equitable, just, and proper;

F. That this Court adjudge, decree and declare the rights and other legal relations of the parties to the subject matter here in controversy, in order that such declarations shall have the force and effect of final judgment; and

G. That this Court retain jurisdiction of this matter as necessary to enforce the Court's orders.

Respectfully submitted on this, the 24th day of August 2004,

Attorneys for Plaintiffs,



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Phone: (480) 444-0020

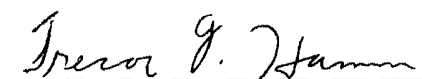
Fax: (480) 444-0028

* Specially appearing pursuant to LR83.1(d).

VERIFICATION

I, Trevor J. Hamm, a citizen of the United States and a resident of the State of North Carolina, am president of and agent for Alpha Iota Omega Christian Fraternity, a student organization at the University of North Carolina at Chapel Hill. I have read the foregoing Verified Complaint for Declaratory and Injunctive Relief and Nominal Damages and declare under the penalty of perjury under the laws of the State of North Carolina that the foregoing is true and correct.

Dated this 23rd day of August, 2004

A handwritten signature in cursive script that reads "Trevor J. Hamm". The signature is written in dark ink and is positioned above a horizontal line.

Trevor J. Hamm

VERIFICATION

I, Carlon D. Myrick, a citizen of the United States and a resident of the State of North Carolina, am a member of Alpha Iota Omega Christian Fraternity, a student organization at the University of North Carolina at Chapel Hill. I have read the foregoing Verified Complaint for Declaratory and Injunctive Relief and Nominal Damages and declare under the penalty of perjury under the laws of the State of North Carolina that the foregoing is true and correct.

Dated this 23rd day of August, 2004

A handwritten signature in cursive script, reading "Carlon D. Myrick", written over a horizontal line.

Carlon D. Myrick

ATTACHMENT/EXHIBIT

1

Constitution of Alpha Iota Omega Christian Fraternity, Inc.

Article I – Identification

- Section 1) This organization shall be known as Alpha Iota Omega Christian Fraternity, Inc.
- Section 2) The official colors of the organization shall be Black, Green, and White.
- Section 3) The term of this corporation shall be perpetual.

Article II – Purpose

- Section 1) The purpose of Alpha Iota Omega Christianity Fraternity, Inc. is to perpetuate brotherhood, leadership, and service among men through accountability, mentorship, and outreach in local communities.

Article III – Objectives

- Section 1) To establish a precedent of holiness for men of all ethnicities.
- Section 2) To promote spiritual growth, initiate fellowship, and develop accountable relationships among men.
- Section 3) To demonstrate a standard of excellence in intellectual achievement.
- Section 4) To teach the principles of God's kingdom through strategic community service.
- Section 5) To become integral members of the universities and the community at large through involvement in social, political, and cultural organizations.

Article IV – Membership

- Section 1) Membership is exclusively open to all male individuals.
- Section 2) The terms, mode, and admission to membership, the rights, duties of members and officers, the methods of meeting, and all other matters concerning the government of this organization shall be determined by the By-Laws.

Article V – Officers

- Section 1) The National Officers consist of the National President, Executive Undergraduate Affairs Coordinator and Executive Alumni Affairs Coordinator.
- Section 2) The National President shall have the power of appointment of intermediate officers as deemed necessary.

- Section 3) The Board of Directors shall be comprised of the National President and other individuals selected to serve on the Board through the selections process.

Article VI – Funds

- Section 1) The funds of this organization shall be accrued by fees, fines, dues, and by such other means as the organization shall determine.
- Section 2) The funds shall be managed in accordance with the By-Laws.

Article VII – Jurisdiction

- Section 1) The jurisdiction of this organization shall initially be that area occupied by the city of Raleigh/Durham, state of North Carolina.
- Section 2) Growth outside of the aforementioned area, included growth of national nature, will be the letter of this constitution whenever and wherever such growth is deemed favorable and necessary for the purpose and objectives of this organization.
- a. Growth shall be governed by a system of chartering a chapter in accordance with the By-Laws and the policies of the institution at which an undergraduate chapter would exist.
 - b. Chapters shall be governed by this constitution, the By-Laws, and the chapter By-Laws. The By-Laws of the chapter shall contain a severability clause declaring their effectiveness in case of conflict with the laws of the state in which the charter was granted, this constitution and By-Laws.

Article VIII – Disciplinary Action

- Section 1) Any member who violates either the Constitution, By-Laws, Standing Rules, or other regulations of this organization shall be subject to disciplinary action
- Section 2) The terms, mode, and method of discipline, and all other matters concerning disciplinary action shall be determined by the By-Laws.

Article IX – By-Laws

- Section 1) The By-Laws, such as are written, shall never conflict with the Constitution, nor shall they be amended when such amendment provides said conflict.

Article X – Standing Rules

- Section 1) Such rules shall be adopted for special need and that is of lesser importance or permanence than the Constitution and By-Laws.

- Section 2) Adoption of Standing Rules shall be determined by the By-Laws. These rules, because of their special use, shall not conflict with the Constitution or By-Laws of this organization.

Article XI – Amendments

- Section 1) The membership, whenever two-thirds shall deem it necessary, shall propose amendments to this constitution.
- Section 2) All proposals for amendment must be made at a regular meeting of this organization, and submitted to the Board of Directors for concurrence prior to membership vote.

Article XII – Alpha Epsilon Omega

- Section 1) This organization recognizes Alpha Epsilon Omega Christian Sorority, Inc. as its sister organization.
- Section 2) The duties, obligations, and other matters concerning this recognition shall be determined by the By-Laws.

ATTACHMENT/EXHIBIT 2

The BY-LAWS of ALPHA IOTA OMEGA CHRISTIAN FRATERNITY, INC.

Article I – General

- Section 1:** These are the By-Laws to the constitution of Alpha Iota Omega Christian Fraternity, Incorporated as ratified and amended.
- Section 2:** The purpose of Alpha Iota Omega Christianity Fraternity, Inc. is to perpetuate brotherhood, leadership, and service among men through accountability, mentorship, and outreach in local communities.
- Section 3:** The Fraternity shall have such powers as are now, or may hereafter be, granted by the General Laws of the State on North Carolina authorizing the formation of corporations.

Article II-Goals

- Section 1:** The goal of the undergraduate sector of the organization is to uphold the Great Commission of Jesus Christ by serving members of Greek letter organizations through evangelism and mentorship, both on university campuses and in the greater community.
- Section 2:** The goal of the graduate sector is to demonstrate true brotherhood, and impact our local communities by mentoring the next generation and getting involved in with social issues in a biblical way.

Article III – Office

- Section 1:** The principal address of the Fraternity in the State of North Carolina is: 5500 Fortunes Ridge Drive #74B, Durham, North Carolina 27713.

Article IV – Membership

- Section 1: Membership**
- a. While Alpha Iota Omega Christian Fraternity, Inc. was established to provide a constructive spiritual environment for college men, membership in this organization shall be open to all male individuals without regard to race, color, national origin, disability, age, or veteran status having met the qualifications described herein. However, due to the explicit Christian purposes and tenets on which this organization is founded, members shall be selected according to the standards set by the organization, in accordance with the statement of faith.
 - b. Members are entitled to all the rights and privileges provided that they adhere to all rules and regulations of the Fraternity, respectively, and remain in good standing as defined in Section 9.
- Section 2: Definitions**
- a. An ‘Undergraduate Member’ of the Fraternity is one who is enrolled in an accredited four-year institution offering baccalaureate degrees.

- b. A 'Graduate Member' of the Fraternity is one who has successfully obtained his post-secondary degree from an accredited institution.
- c. An 'Honorary Member' of the Fraternity is one who is initiated in recognition of work and/or achievements that in some way have helped to fulfill the Fraternity purpose.
- d. A 'Member-at-Large' of the Fraternity is one who chooses not to affiliate with a local chapter, but still pays dues.

Section 3: Structure

- a. Membership shall be on the undergraduate and the graduate chapter levels. Membership shall be through the dues structure stated herein.

Section 4: Undergraduate

- a. Initiation shall be available to all individuals enrolled in an accredited four year institution offering baccalaureate degrees, provided:
 - i. They are in good standing with their institution financially and academically. Candidates are considered in good academic standing if they have a cumulative 2.5 grade point average based on a 4.0 scale. In the event the academic requirements of the candidate's institution are higher than the Fraternity's requirement, the institution's requirement shall supersede the organization's. Additionally, if a candidate with a grade point average between 2.0 and 2.49 is deemed to meet certain 'Exceptional Circumstances', he can be considered for membership by the governing body of the organization, or a committee designated for such considerations.
 - ii. They have completed one (1) full semester at their institution and have a minimum of credit hours that determine a full-time student.
 - iii. They have demonstrated they are of sound moral character, and adhere to the standards and tenets upon which the Fraternity was founded.
 - iv. With the exception of military, professional and service organizations, they are not members of another Greek fraternal organization.

Section 5: Graduate

- a. They have successfully obtained their post-secondary degree from an accredited institution.
- b. With the exception of military, professional and service organizations, they are not members of another Greek fraternal organization.
- c. They must have demonstrated a high standard of ethical conduct and professionalism as reflected in the foundational tenets of the Fraternity.

Section 6: Any member of the Fraternity may elect to become a Member-at-Large if he chooses not to affiliate with a local chapter.

Section 7: Honorary

- a. An 'Honorary Member' shall be one who has singularly achieved recognition of work and/or achievements that in some way have helped to fulfill the Fraternity purpose.
- b. Individual Fraternity members or chapters recommend a candidate for Honorary Membership to the board.

Section 8: Annual membership dues, also known as National Dues, are payable at the beginning of the fiscal year, July 1st. Each undergraduate member, not associated with an active undergraduate chapter, shall pay annual membership dues in the amount of \$75.00. Each graduate member, not associated with an active graduate chapter, shall pay annual membership dues in the amount of \$150.00. These dues are independent from the chapter dues, which are determined by the members of that chapter.

Section 9: Good Standing and Termination

- a. A member is considered in good standing provided he adheres to all rules, policies, the constitution, bylaws and regulations and is financial. A member is considered financial if he has paid his annual membership dues as a member-at-large or as a member of a chapter as specified in Sections 4 or 5 and Section 6.
- b. A member not in good standing is not entitled to the rights and privileges of Alpha Iota Omega and shall be prohibited from participating as a member of the organization in any capacity.
- c. Voluntary disassociation (Termination) from this organization shall be accomplished by a member submitting his letter of resignation to both the Chairman of the Board and the National President.
- d. Involuntary disassociation from either organization shall be invoked upon finding that an initiate has willingly and wantonly violated material rules and regulations and/or defaced this organization. Any such violation automatically terminates membership in Alpha Iota Omega, and the name of the initiate in violation will be permanently removed from the record. Involuntary disassociation, being the most severe punishment that can be imposed upon an initiate, may be imposed by unanimous vote of the Board of Directors or by unanimous vote of the elected officers from the member's chapter with the unanimous approval of the Board of Directors.

Section 10: Chapter Dues and Intake Fees

- a. Undergraduate Chapters shall pay as chapter dues the amount equal to \$75.00 per member to the national organization.
- b. Graduate Chapters shall pay as chapter dues the amount equal to \$150.00 per member to the national organization.
- c. Undergraduate and graduate chapters dues must be paid by September 15th of each year.
- d. All prospective undergraduate members meeting the requirements of undergraduate membership shall pay the undergraduate intake fee of \$200.00 regardless of the academic term or semester application is made.
- e. Any prospective member meeting the requirements for graduate membership shall pay the graduate intake fee of \$400.00, unless he was previously a member as an undergraduate.

- f. All intake fees can be no less than what is paid to the national but can be more based on the discretion of the undergraduate or graduate chapters.
- g. Intake fees are due two weeks before the scheduled listening day.

Article V – Board of Directors

Section 1: General Powers

- a. The Board of Directors (the Board) shall work to perpetually protect the best interests of the Fraternity.
- b. The Board of Directors shall conduct all business and affairs of the Fraternity and shall be the only persons entitled to vote regarding the affairs of the Fraternity.

Section 2: Eligibility

- a. Any financial undergraduate or graduate chapter initiate can be selected for Board membership.
- b. Any member of the Board of Directors must meet the spiritual qualifications of eldership.
- c. Former Officers can be selected for Board membership.
- d. It is highly recommended that the Board members complete training, as specified in the National Manual, at least once every 2 years.

Section 3: Number of Board Members

- a. The number of Directors shall be no less than seven (7) and no more than eleven (11). Of this number, at least one (1) and no more than two (2) members must be undergraduate members of the Fraternity and at least one (1) and no more than two (2) must be graduate members active in a local graduate chapter. These two (2) to four (4) members shall be selected by a selections committee in accordance with Section 4.

Board Officers

- b. The Board of Directors will have a Chairman, an Executive Secretary and an Executive Treasurer. The positions will be elected among current Directors. The National President will serve on the board, but cannot simultaneously serve as Chairman.

Section 4: Selection of Board Members

- a. All Board positions, with the exception of the at least one (1) no more than two (2) undergraduate and at least one (1) no more than two (2) graduate members specified in Section 3a, shall be filled by an appointment by the Chairman with the advice and a majority vote of the present Board of Directors given at a lawfully convened meeting thereof.
- b. A selections committee shall be assembled for the purposes of selecting the undergraduate and graduate Board members. The Board of Directors shall select the members of this committee. The criteria and stipulations for the selection committee shall be outlined in the National Manual.
- c. Those set forth in the Articles of Incorporation shall comprise the original Board of Directors.

Section 4: Term of Office

- a. The term of membership shall be two (2) years for all Board members, with the exception of the members selected in accordance with Section 4b. The term for these members is two (2) years. The National President continues as a member of the Board until his resignation, death, or removal in accordance with Article III, Section 9.

Section 5: Regular Meetings

- a. Regular meetings of the Board of Directors will be held at least four (4) times a year.
- b. The Chairman shall determine the location for regular meetings.
- c. At least one regular meeting each year shall be dedicated to the selection of new Board members, when necessary.

Section 6: Special Meetings

- a. The Chairman at the request of any Director may call special meetings of the Board of Directors.
- b. The meetings shall be held in the principal office of the Fraternity's office or at such other place as the Directors may determine.

Section 5: Notice

- a. Notice of the regular or any special meeting of the Board of Directors shall be given by oral notice by the Administrative Director to each Director a month in advance, and with a follow-up letter thereafter.
- b. The attendance of a Director at any meeting shall constitute a waiver of notice of such meeting, except where a Director attends a meeting for the express purpose of objecting to the transaction of any business because the meeting is not lawfully called or convened.

Section 6: Quorum

A two-thirds majority of the Board of Directors shall constitute a quorum for transaction of business at any meeting of the Board.

Section 7: Board Decisions

The act of the majority of the Board of Directors present at a meeting at which a quorum is present shall be the act of the Board of Directors.

Section 8: Resignation, Vacancies, and Additions

- a. Any Board member may resign upon presenting a formal letter of resignation to the present Board of Directors.
- b. Any vacancy should be addressed at the Board meeting immediately following the vacancy's occurrence.
- c. A two-thirds (2/3) vote of the Board of Directors present and voting at a lawfully convened meeting thereof shall be required in order to increase or decrease the number of Board members within the limits stated in Section 3.

Section 9: Removal

- a. In the event, any Board member shall have serious charges preferred against him, which, if true, would disqualify him from his position, the Chairman shall convene a special meeting of the Board of Directors to consult with the Board member in question and consider his removal. If the Chairman is the Director in question, then the National President shall convene the meeting.
- b. A two-thirds (2/3) vote of the Board of Directors present and voting at a lawfully convened meeting thereof shall be required for removal.
- c. Board members may also be removed according to provisions of Article III, Section 9.

Section 10: Compensation

Board members shall not receive salaries, but can receive compensation for their services.

Section 11: The Powers of the Board

- a. **Chairman's** goal is to provide leadership and direction to the membership and governing board of the organization, by ensuring that all Directors understand and exercise their responsibilities in regard to sound programmatic and fiscal management of the organization.
 1. Prepare agenda for membership meetings.
 2. Prepare agenda for Board meetings.
 3. Preside over all regular and special membership meetings.
 4. Preside over all regular and special Board meetings.
 5. Sign, with other appropriate officers, corporate and legal documents.
 6. Maintain current knowledge of programs and activities.
 7. Prepare agenda for Executive Committee meetings.
 8. Preside over Executive Committee meetings.
 9. Supervise standing committee chairpersons.
 10. Facilitate communication between Board and Staff.
 11. Ensure Board follow-through on all assigned tasks.
 12. Assist in orientation of new Directors.
 13. Supervise the National President.
- b. **Executive Secretary's** goal is to oversee the record keeping and correspondence of the membership and the governing board of the organization, ensuring compliance with relevant provisions of the bylaws, North Carolina's not-for-profit corporate law, and IRS regulations.
 1. Record and sign the minutes of the meetings of the membership.
 2. Record and sign the minutes of the meetings of the Board.
 3. Send notices in accordance with the provisions of the bylaws or as required by the law.
 4. Ensure that organizational records are protected for long-term safekeeping.
 5. Maintain directory of members and the Board, including names, addresses, phone numbers and current position within the organization.
 6. Sign appropriate organizational documents as needed.
 7. Monitor parliamentary procedure, as needed.
 8. Maintain organizational record book.

9. Sign official corporate correspondence.
 10. Update bylaws, as needed when relevant Board resolutions are adopted.
 11. Attend and participate in Executive Committee meetings.
 12. Attend and participate in at least one other standing committee.
- c. **Executive Treasurer's** goal is to provide financial management and fiscal controls for the organization. His duties include but are not limited to:
1. Monitor receipt of all securities and monies due to and held by the organization.
 2. Ensure that all funds are properly deposited and disbursed in a timely manner.
 3. Render monthly, quarterly and annual financial reports of the organization to the Board of Directors.
 4. Ensure that all Federal, State, and local financial reports are to be filed on a timely basis.
 5. Oversee the preparation of the annual budget and monitor its implementation.
 6. Ensure that the organization maintains its tax-exempt status.
 7. Oversee the design and implementation of an appropriate bookkeeping and accounting system.
 8. Contract with an independent CPA to conduct an annual audit.
 9. Sign fiscal forms and instruments as necessary.
 10. Attend and participate in Executive Committee meetings.
 11. Attend and participate in fundraising meetings as necessary.

Article VI – Officers

Section 1: Officers

- a. The National Officers consist of the National President, Executive Undergraduate Affairs Coordinator and Executive Alumni Affairs Coordinator.

Section 2: Appointment and Term of Office

- a. The Board of Directors must confirm by majority vote all officers appointed by the National President.
- b. The same person may hold no two offices simultaneously. In addition, no Officer, except for National President, can simultaneously hold a position on the Board of Directors.
- c. An Officer shall hold office until he is removed and a successor has been duly appointed by the National President and confirmed by the Board.

Section 3: Removal

- a. Any officer confirmed by the Board of Directors may be removed by the Board of Directors whenever in its judgement the best interests of the Fraternity would be served thereby, but such removal shall be without the prejudice to the contractual rights, if any, of the officer so removed.

- b. A two-thirds (2/3) vote of the Board of Directors present and voting at a lawfully convened meeting thereof shall be required for removal.

Section 4: Vacancies – A vacancy in any office because of death, resignation, removal, disqualification or otherwise, may be filled by an appointment by the National President. These appointments must be approved by a majority vote of the Board of Directors. If the National Presidency is vacant, then the Board of Directors will appoint an interim President until a full search is conducted.

Section 5: Each officer shall be paid a salary comparable to his duties. The Board of Directors shall determine the amount of said salaries.

Section 5: The Powers of Officers

a. The National President's duties include but are not limited to:

1. shall be a continuing member of the Board of Directors.
2. shall have general management of the Fraternity and general supervision of the other officers.
3. shall appoint the other National Officers and preside at all meetings of the National Officers.
4. shall be ex-officio a member of all standing committees, and shall have the general powers and duties of supervision and management usually vested in the office of president of a corporation.
5. shall serve as the official public relations contact and be the official representative of the Fraternity.
6. shall host the annual national convention.

b. Executive Undergraduate Affairs Coordinator's duties include but are not limited to:

1. He shall oversee all undergraduate chapters through communication with the Regional Directors.
2. He shall oversee expansion to new campuses and areas.
3. He shall communicate with the chapters as they conduct membership intake.

c. Executive Alumni Affairs Coordinator's duties include but are not limited to:

1. He shall oversee the affairs of all alumni members and graduate chapters through communication with the Regional Directors.
2. He shall send quarterly journals to alumni members.
3. He shall be responsible for the maintenance of the national web site and email listserve.
4. He shall collaborate with the Executive Secretary in preparing for the national convention and the Executive Treasurer with fundraising.

d. Regional Directors:

1. shall be appointed by the National Officers and confirmed by the National President.
2. must be an active member of a local graduate chapter.

3. shall oversee the designated region's undergraduate and graduate chapters.
4. shall communicate with graduate chapter presidents and graduate advisors to undergraduate chapters.
5. shall coordinate regional retreats and conferences.

Article VII - Committees

- Section 1:** Committees may be created and dissolved by the Board of Directors on every level respectively. Such committees shall discharge such responsibilities as may be assigned by the Board of Directors, respectively.
- Section 2:** The Executive Committee will consist of the National President, Executive Secretary, Executive Treasurer, Alumni Affairs Coordinator, and Undergraduate Affairs Coordinator.
- Section 3:** The Board of Directors may from time to time designate two (2) or more of its members to constitute an executive committee.
- Section 4:** Each committee shall have and exercise such powers, not inconsistent with the North Carolina Nonprofit Corporation Act, the Articles of Incorporation, or these Bylaws, as authorized by the Board of Directors. The designation of any such committee and the delegation thereto of authority shall not operate to relieve the Board of Directors, or any individual director, of any responsibility imposed upon it or him by law. The members of a committee shall act only as a committee.
- Section 5:** Each committee member shall continue to serve until the next annual meeting of the Board of Directors or until his successor is appointed, unless the committee shall be sooner terminated, such committee member is removed with or without cause, or such committee member shall cease to qualify as a member thereof.
- Section 6:** Meetings of the committee may be held within or without the state of North Carolina, and may be held by means of telephone conference. A majority of any such committee may fix the time and place of its meetings. Each committee shall keep records of its actions, and report such actions to the Board of Directors and the president.
- Section 7:** A majority of the then serving members of any committee shall constitute a quorum. Any action of the majority of those present at a meeting at which a quorum is present shall be deemed the action of the committee; except, when a committee has only two (2) members, then any action must be by unanimous consent.
- Section 8:** The Board of Directors may appoint two or more persons from among its own number to serve as the Executive Committee. The Executive Committee shall have authority to transact such business as shall be necessary for the administration and operation of the Corporation between Board of Director meetings and shall have

such power as shall, from time to time, be vested in it by the Board of Directors. In no event shall the Executive Committee have authority to:

1. amend the Articles of Incorporation or Bylaws of this Corporation;
2. change the qualifications and voting rights of Directors or elect or remove Directors from office;
3. authorize the transfer, gift, or encumbrance of all or substantially all the assets of this Corporation in a single or related transaction;
4. authorize the dissolution, merger or consolidation of this Corporation; or
5. amend or repeal any joint affiliation agreement or any resolution of the full Board.
6. Meetings of the Executive Committee may be called by the Board chairman, president, chairman of the Executive Committee, or any two members of the executive Committee. It may also be suggested by the Executive Director. All actions by the Executive Committee shall be reported to the Board of Directors at the meeting next succeeding such action.

Section 9: Finance Committee The Board of Directors may appoint two or more persons from among its own number to serve as the Finance Committee. The Finance Committee shall oversee budget preparation, financial controls, financial audits, and other financial operations of the Corporation, and shall have such other powers and duties as shall, from time to time, be vested in it by the Board of Directors. Meetings of the Finance Committee may be called by the Board chairman, president, Executive Director, chairman of the Finance Committee, or any two members of the Finance Committee. All actions by the Finance Committee shall be reported to the Board of Directors at the meeting next succeeding such action.

Section 10: Development Committee The Board of Directors may appoint two or more persons from among its own number to serve as the Development Committee. The Development Committee shall focus on fundraising, fundraising schemes/plans, and public relations within and/or outside the community, and shall have such other powers and duties as shall, from time to time, be vested in it by the Board of Directors. Meetings of the Development Committee may be called by the Board Chairman, president, Executive Director, chairman of the Development Committee, or any two members of the Development Committee. All actions by the Development Committee shall be reported to the Board of Directors at the meeting next succeeding such action.

Section 11: Program Committee The Board of Directors may appoint two or more persons from among its own number to serve as the Program Committee. The Program Committee shall oversee the programs of the Corporation. They can assess and evaluate existing programs, propose and develop new programs, and shall have such other powers and duties as shall, from time to time, be vested in it by the Board of Directors. Meetings of the Program Committee may be called by the Board chairman, president, executive director, chairman of the Program Committee, or any two members of the Program Committee. All actions by the Program Committee shall be reported to the Board of Directors at the meeting next succeeding action.

Article VIII – Contracts and Banking Provisions

- Section 1:** The Board of Directors may authorize any officer, agent or agents, to enter into the contract or execute or deliver any instrument in the name of or on behalf of the Fraternity and such authority may be general or confined to special instances.
- Section 2:** All checks, drafts or other orders for the payment of money, notes, or other evidences of indebtedness issued in the name of the Fraternity shall be signed by such officer or officers, agent or agents of the Fraternity and in such a manner as shall from time to time be determined by resolution of the Board of Directors.
- Section 3:** All funds of the Fraternity not otherwise employed shall be deposited from time to time to the credit of the Fraternity in such financial institution and /or investment, in accordance with the guidelines recommended by the Financial Director and approved by the Board of Directors.
- Section 4:** The Board of Directors may accept any contribution, gift, bequest or device for any purpose of the Fraternity.

Article IX – Accounting Year and Audit

- Section 1:** The accounting year shall follow the fiscal year of July 1st through June 30th.
- Section 2:** At the end of the accounting year, the books of the Fraternity shall be closed and a financial statement prepared for that year. An independent accounting firm shall certify such financial statements, the partners of which are certified public accountants. Such financial statements shall be promptly mailed to each member of the Board of Directors and the National Office and shall be submitted to the chapters.

Article X – Amendments

- Section 1:** These By-Laws may be amended or new By-laws adopted by a two-thirds vote of the Board of Directors.

Article XI – Membership Intake

- Section 1:** The procedures, policies, and criteria for Membership Intake will be specified in the Intake Manual. Amendments shall be made to the Intake Manual by the Board of Directors as deemed necessary.
- Section 2:** Hazing in any form is prohibited.

Article XII – Alpha Epsilon Omega

- Section 1:** Alpha Epsilon Omega Christian Sorority, Inc., as stated in the Constitution, is recognized as our sister organization.
- Section 2:** Alpha Iota Omega will support Alpha Epsilon Omega in the following ways:
- i. serving as an available resource
 - ii. sharing materials and supplies
 - iii. assisting with community service initiatives
 - iv. attending meetings when requested
- Section 3:** Chapters
- a. Where an undergraduate chapter of Alpha Epsilon Omega and Alpha Iota Omega exist on the same campus, or when a graduate chapter of Alpha Epsilon Omega and Alpha Iota Omega exist in the same city or geographic location, those chapters will work together towards achieving our shared purpose.
 - b. Chapter By-Laws must have an article stipulating this recognition and the duties thereof.

ATTACHMENT/EXHIBIT 1 3

Alpha Iota Omega Christian Fraternity, Inc.

UNDERGRADUATE MANUAL



**Producing Christian Leaders,
Serving the Greek
Community**

"Slaves to Righteousness"

Table of Contents

- I. Statement of Faith**
- II. National Tenets**
- III. National Standards**
- IV. Three Fold Purpose**
- V. Lines of Communication**
- VI. Progress Measurements**
- VII. Demerit System**
- VIII. Disciplinary Actions**
- IX. Terms and Conditions of Suspension**
- X. Constitution and By-Laws**
- XI. A Typical Semester**
- XII. Officers- Board and Non-Board Positions**
- XIII. Transitioning**

Statement of Faith

- We believe in the Scriptures, the infallible Word of God containing sixty-six books, as being fully inspired by God. The Bible is the supreme and final authority in all matters on which it speaks.
- We believe there is one Almighty and perfect God, eternally existent in three persons: the Father, the Son Jesus Christ, and the Holy Spirit.
- We believe in the Deity of our Lord Jesus Christ, in His virgin birth, in His sinless life, in His miracles, in His vicarious and atoning death through His shed blood, in His bodily resurrection, in His ascension to the right hand of the Father, and in His personal return in power and glory.
- We believe that for the salvation of lost and sinful man, regeneration by the Holy Spirit is absolutely essential.
- We believe in the Holy Spirit, who has come to glorify Christ, to convict people of sin and to draw us to the Savior, Jesus. We believe the Holy Spirit indwells God's children, gives new life, empowers believers for service, imparts spiritual gifts (as recorded in the New Testament and manifested in the early church), enables believers to live a fruitful, holy and spirit-filled life, and guides God's children into all truth.
- We believe in the resurrection of both the saved and the lost; they that are saved, unto eternal resurrection of life and they that are lost, unto the resurrection of damnation.
- We believe in the spiritual unity of believers in our Lord Jesus Christ. We believe in the historic creeds of the church.

National Tenets

The following Tenets incorporate the principles that God has called members of Alpha Iota Omega to realize and fulfill in their lives and are also our specific goals:

Tenet 1:DISCIPLESHIP

We believe in fulfilling Jesus' Great Commission as put forth by the example of His life and His eternal word. In order for *the kingdom of God to stand as well as this brotherhood*, we are to make disciples that will not only be testimonies of the living God in both speech and character, but their work will greatly exceed ours by the anointing given to them through our impartation by the Holy Spirit. (Matthew 28:18-20; Isaiah 8:16 & John 14:12-15)

Tenet 2:UNITY

We believe that God grants us to be of the same mind according to Christ, that we may love Him and accept our fellow man as Christ has accepted us. (Romans 15:6-7)

Tenet 3:PRAYER

We believe that God has called all Christians into an intimate relationship based upon His word, which he uses as the Master architect of our lives and all we do, through our prayers. (Psalm 127 & Ephesians 6:18)

Tenet 4:BIBLE STUDY

We believe that the Bible is the infallible Word of God and our only true foundation for building a relationship with the Father. Thus, we must study the Word to be firmly planted, to be set free from our enemies, and to learn about and obey His commandments. By doing this we prove ourselves to love and be disciples of Christ. (John 8:31-32 & 1 John 3:18-20)

Tenet 5:REPUTATION OF INTEGRITY

We believe that we should be reliable and honest men who behave properly towards all men and women; that live the Word of God, not merely preach it. (1 Thessalonians 4:12 & Titus 1:7-9)

Tenet 6:CHURCH

We believe that God has placed us into a body of believers for mutual edification and encouragement. The meeting together of this body provides an atmosphere of corporate worship, prayer and Biblical teaching vital for spiritual maturation. (Hebrews 10:25 & 1 Corinthians 12:12-27)

Tenet 7:FAITHFULNESS

We believe in the complete, cheerful, and timely fulfillment of all commitments to God and to man, whether it be monetary, time, or duty. (Proverbs 20:6 & Luke 16:10)

Tenet 8:ZEAL

We believe that as people removed from darkness, God has called us to be patient, diligent, and zealous in serving Him. (Romans 12:11-13)

Tenet 9:SERVICE

We believe that God has called us to liberty not for our own interests, but for esteeming others better than ourselves that we may serve one another as Christ served us. (Galatians 5:13 & Philippians 2:1-11)

Tenet 10:ENCOURAGEMENT

We believe that God gives us encouragement so that we may encourage one another and other people in speech and action, leading to the community's edification. (Romans 15:1-5).

National Standards/Requirements

Alpha Iota Omega choose to clearly define our national standard requirements with the expectation that all those who desire to be members will meet these requirements and continue to adhere to them as members of the organization. We recognize that not all of our standard requirements are necessary for being a Christian. Yet, the standards are necessary for being a part of this organization, considering the great mission given to us by God. Along with the above statement of faith, our national standard requirements include:

(1) Conviction of **Holiness**

Individuals that aspire to be members of AIΩ must swear to live their lives in a way that is holy and acceptable to GOD by the grace and empowerment of our Lord Jesus Christ and His Holy Spirit. Cognizant of the fact that the Spirit & the Word testify to the same thing, persons should set the Word of God above their emotions and natural mind at all times. They must know that GOD has divinely set them apart as His holy priesthood and be fully aware that it may require them to die to their own will beyond the nominal Christian. Specifically, this means that they will be above reproach both on and off campus at all times and will not be affiliated with anything that may make a weak Christian or unbeliever stumble.

Not only should persons acquiesce their rights for the sake of GOD'S Kingdom in ministry, but they should also acquiesce their lives to one another. This means that persons should swear to be transparent and accountable to our brothers/sisters and give them permission to directly address personal issues in their lives so that they may walk in the light with one another.

Persons interested in becoming members must agree to adhere to the standards presented by AIΩ. If they do sin, they will confess, repent, and once again live up to the standard that they have once attained.

Finally, with fear and reverence, they must accept the fact that "without holiness no one will see the Lord." This means that we will not take for granted that just because we are a Christian organization, that God will go with and before us. Instead, they are aware that God's presence in our organization is contingent to our incessant obedience and setting a precedent for obedience until our Lord's coming.

(2) Committed to **Accountability**

In general, we define accountability as: close relationship with someone from the same sex to share struggles and triumphs, who will also hold you to Biblical principles that will keep you out of sin and motivate you towards growth.

Accountability partners or covenant brothers are people who have made a commitment to you to encourage you in your Christian walk. This includes, confessing sins with Godly repentance if necessary (according to the model set in 2 Corinthians 7:10-11), praying for

each other regularly, rejoicing in each others joys and holding each other to a high Biblical standard in character, integrity, purity, and overall excellence in all aspects of life.

(3) A **History of Fruitfulness**

Due to the nature of our ministry to Greek fraternities and sororities, individuals that want to become members should not make AIΩ their first ministry experience. Ministering to members of the Greek system will require past ministry experience of some type.

Individuals aspiring to be members of AIΩ must demonstrate a history of fruitfulness on campus (Numbers 11:16). Spiritual advisors and AIΩ board members must recognize these persons as being fruitful in some of the following areas: disciple making, evangelism, ministry and campus leadership.

(4) Committed to **Discipleship**

This national standard is so important that it is listed also as a foundational tenet of our organizations. We define discipleship as a relationship in which the teachings of God's kingdom are imparted through mentorship and submission not subjection. Defining characteristics of a discipleship relationship include (1) spiritual growth and maturity, (2) principle accountability person, (3) faithfulness and trust, (4) inner healing or getting into one's personal life and background for the purpose of deliverance from soul and spiritual issues (5) setting one up to succeed on his own. Some defining characteristics of a disciple include: submission to the Lordship of Jesus, being teachable, being correctable, being faithful, and being trustworthy.

(5) **Personal Initiative**

The weekly ministry of AIΩ will include events that will demand personal initiative from each member. We expect individuals desiring to be a part of the organization to take initiative and not to need from their spiritual advisor constant encouraging, prodding, or leading into ministry situations. Most weekly affairs will take place in the context of the group, however, we expect individuals to use their faith to get results on their own as well (2 Thessalonians 1:11 NIV).

(6) **Passion for Ministering**

Since our mission is to serve fraternity members through evangelism and discipleship, persons that desire to be in AIΩ must have a passion to minister to Greeks. Individuals may initially have a passion to minister to men or women. We can also channel this passion toward men and women that are members of Greek organizations.

(7) Conviction of **Relational Purity**

Our expectations for male-female relationships are best stated in I Corinthians 7:1, 1 Timothy 5:2, and Colossians 3:5-6. We reject the notions of casual dating and flirting. We also discourage any physical activity that stirs up passion that cannot be righteously fulfilled at that time.

Thus, Alpha Iota Omega members believe that men and women who are not currently in the covenant of Marriage should treat each other as spiritual siblings in all purity according to the model established in I Timothy 5:2. Again, we reject the modern concept of worldly dating identifiable as a casual and temporary relationship often involving some level of sexual activity.

Relationships that we do recognize include Courtship and Engagement. Courtship is a public relationship where a man and woman commit to getting to know each other and to seek the will of God for their lives. This is a form of dating, however the primary difference between worldly dating and courtship is accountability and the intention of marriage. This is not a casual relationship, however if the couple finds that they are not compatible and it is not God's will, they are able to end the relationship without the guilt associated with sexual involvement.

Engagement is an official and public commitment where the couple has decided to marry after seeking the will of God and counsel from their spiritual advisors. In this stage they will still treat each other in absolute purity while planning their lives together.

Three-Fold Goals

When other Greek fraternity or fraternity members ask, we will tell them our purpose is to produce Christian leaders and serve fraternities and sororities. The undergraduate goals of Alpha Iota Omega can be broken down into three specific aims:

- (3) To set a standard of excellence in all areas including brotherhood relationships, scholarship, campus and community involvement, & community service.
I Peter 2:12 "Live such good lives among the pagans that, though they accuse you of doing wrong, they may see your good deeds and glorify God on the day he visits us."

We can achieve this goal by being excellent spiritually; morally; intellectually; relationally, and in our grooming. We should obtain excellence awards and recognition by the campus' Office of Greek Affairs in community service, campus involvement, brotherhood/sisterhood, and scholarship.

This goal of excellence in the Greek community can be measured specifically yet not extensively by how many people want to be in AIΩ. How many invitations we get from other Greek fraternities to participate in joint ventures and also whether or not we are winning awards from the Office of Greek Affairs. We can also measure this goal by our behavior with women/men concerning holiness and companionship.

- (2) To produce Christian Leaders during their college years that will continue in leadership in the years after their college experience.

"Ephesians 4:11 It was he who gave some to be apostles, some to be prophets, some to be evangelists, and some to be pastors and teachers, 12 to prepare God's people for works of service, so that the body of Christ may be built up 13 until we all reach unity in the faith and in the knowledge of the Son of God and become mature, attaining to the whole measure of the fullness of Christ. 15 Instead, speaking the truth in love, we will in all things grow up into him who is the Head, that is Christ. 16 From him the whole body, joined and held together by every supporting ligament, grows and builds itself up in love as each part does its work."

We can achieve this goal by embracing responsibilities in producing in the organization, which will produce stature in everyone. Hearing from God corporately to get direction, practicing spiritual warfare within the Greek community, and exercising wisdom will also help to achieve it. Members also become sharpened by accountable relationships that last for a lifetime. Character and maturity will be forged through members both holding each other accountable and submitting to one another. *Proverbs 27:17 "As iron sharpens iron, so one man sharpens another"*. Every member is strongly encouraged to find mentors for discipleship in successful, holistic Christian living. A faithful time of devotion to God is the highest priority in this goal.

- (1) To evangelize, disciple, and lead the members of the Greek community.

"Matthew 28:18 Then Jesus came to them and said, "All authority in heaven and on earth has been given to me. 19 Therefore go and make disciples of all nations, baptizing them in the name of the Father and of the Son and of the Holy Spirit, 20 and teaching them to obey everything I have commanded you. And surely I am with you always, to the very end of the age."

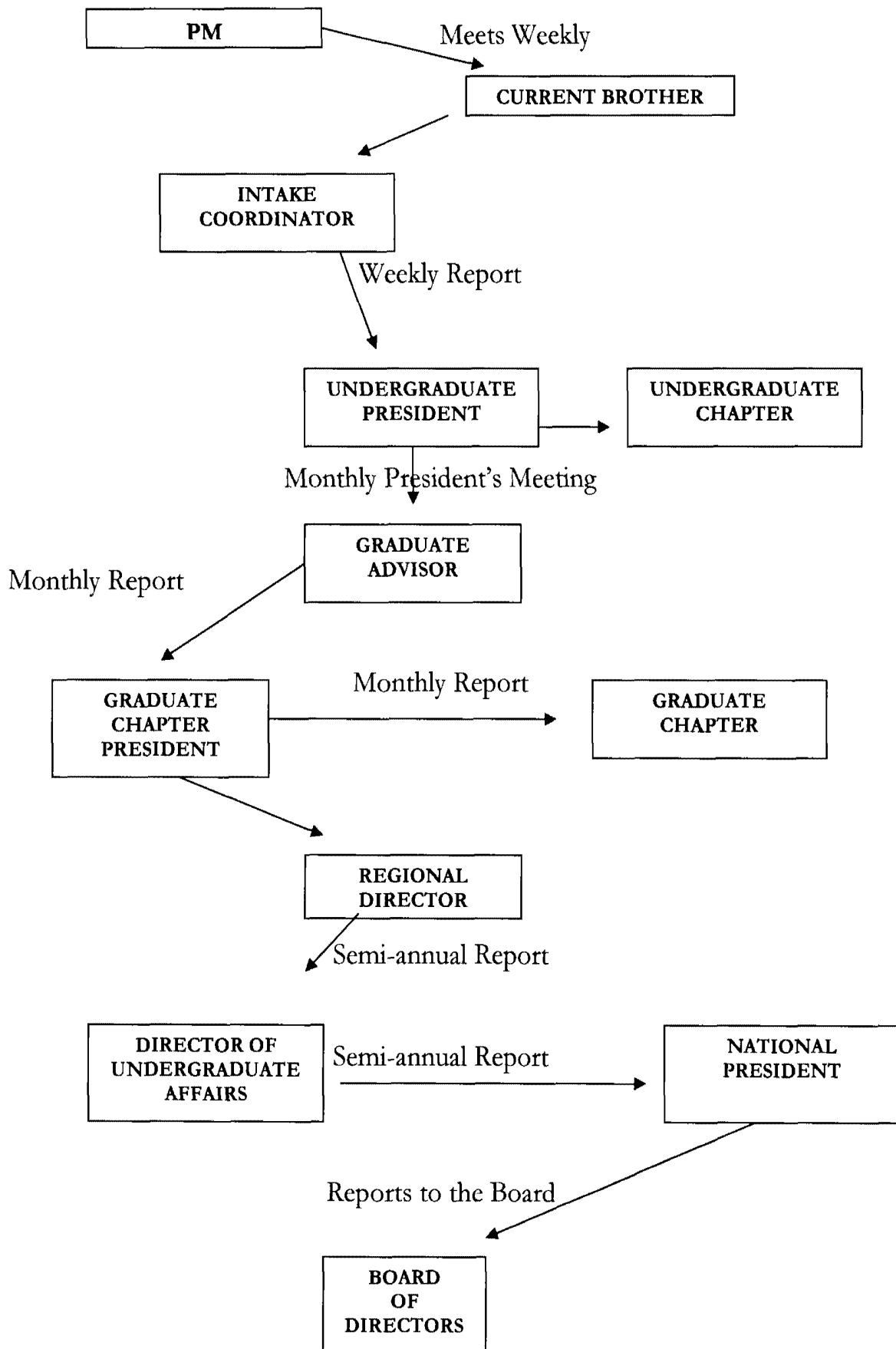
God has given us the power and authority with him to see the strongholds and evil powers put in their rightful places and for us to reap and reign with him (Eph. 1:19, 20, 21; 2:6). As we mentor and disciple them, we will become leaders of leaders!

1. *85% of all fortune 500 company executives are from Greek fraternities.*
 2. *76% of all congressmen and women are from fraternities and sororities.*
 3. *85% Supreme Court justices since 1910 are from fraternities.*
 4. *63% of U.S. Cabinet members 1900 are fraternity members.*
 5. *All but 3 U.S. Presidents from 1825 are from fraternities.*
- (Source: USC 28th Street Magazine Fall 2000)*

This goal can be achieved through prayer, study, our creative strategies, and implementation of them.

This goal can be measured by how many relationships we have with Greek fraternity members, how many Greeks get saved, and how many are disciplined and plugged into a church.

LINES OF COMMUNICATION



Progress Measurements

As stewards of this organization's ministry to secular Greek organization members, it is our responsibility to account for and measure our progress. Every Semester, each chapter will submit a report on Greek Service, Scholarship, Community & Campus Service, Sisterhood, and Campus Involvement. It is the job of the chapter to keep records of these activities for the purpose of reporting them at the end of each semester. Each of these areas are absolutely essential in maintaining our witness for Jesus Christ, and our mission as an organization. Chapters may receive awards in excelling in the following areas:

Greek Service includes the events, relationships, and results of all our efforts in evangelizing and spiritually mentoring Greeks. This is obviously our main mission. *We require* major events and weekly activities for serving Greeks.

Scholarship is core to our reputation to campus faculty and Greek organization members. Thus, *we require* for each individual in the Chapter to maintain a GPA of 2.5 or above.

Community & Campus Service are all the service events geared towards the community and campus, and the results of those events. *We require* that each member completes at least 25 hours of service for each semester (the service doesn't have to strictly be an event sponsored by AIΩ, but can involve service in other organizations, discipleship a.k.a. "peer mentoring", church, etc.).

Brotherhood is measured by the events and weekly activities that specifically foster relationships within the organization, and the results of these things. *We require* monthly fellowships and weekly activities that foster sisterhood.

Campus Involvement is measured by each member's involvement in other campus organizations besides this fraternity. *We require* that each member be actively involved in at least one other organization.

Alpha Iota Omega

Demerit System (Individual)

<u>Reasons for Demerits</u>	<u>Number of Demerits</u>
▪ Tardiness for ALL AIΩ meetings/ appointments	5
▪ Not being your “sister’s keeper”	2
▪ Tardiness for AIΩ meetings/ appointments	2
▪ Absence from AIΩ meetings	10
▪ Absence from class	2+\$10
▪ Behavior:	5
➤ Speech (foul language, gossip, etc)	
➤ Countenance (rolling eyes, etc.)	
➤ Attitude that may affect image of AIΩ	
➤ Compromising integrity	
Total Demerits Necessary for Dismissal	50

***False demerit keeping will compromise the integrity of the entire chapter and will result in the dismissal of the entire pledge class.**

Alpha Iota Omega

Chapter Demerit System (for Charter Chapters)

<u>Reasons for Demerits</u>	<u>Number of Demerits</u>
▪ Participation in an event as an Official Alpha Iota Omega Chapter	10
▪ Neglecting to submit weekly reports	5
▪ Defaming the name of Jesus Christ or Alpha Iota Omega	10

If the chapter receives 15 demerits, the process will be nullified.

Disciplinary Actions

Disciplinary actions for members will include:

1. If a brother transgresses the constitution arriving late to meetings, not dressing appropriately for meetings, or not meeting deadlines (not reporting progress weekly about an issue or event) it will result in a \$10 fine per transgression following the meeting. Absence from the meeting with no excuse, without a valid excuse, or without giving the Vice President at least 24 hours notice will result a \$10 fine also. The Board will determine if there is a credible reason to exclude the individual from disciplinary actions. Members will be given 2 weeks to pay the fine; if the fine is not paid the Board will take further disciplinary actions.

2. These actions shall be taken for members entertaining behavior not reputable for the brotherhood outside of meetings:

- a. Two to three brothers will approach the member.
- b. If the problem persists then the Board will approach the member. Disciplinary action taken by the Board can involve probation or petition for termination.
- c. If actions taken by the Board are unfruitful, then the advisor will approach the member.
- d. After Prayer the Advisor may remove members from the Board and chapter.

3. If things are perceived by a member to be out of order or detrimental to the purpose of the brotherhood, any member may appeal to the Advisor.

4. Probation:

- a. A member may be put on probation for academic and/or personal reasons observed by the Board and/or Graduate Advisor (i.e. low grades, problems with sin, etc...)
- b. If a member is placed on probation, he will not be allowed to hold a leadership position within the chapter for the probationary period. During that time, the member will be monitored by the Board and the Graduate Advisor to ensure that the reason for probation is being alleviated and/or effectively handled.
- c. The probationary period will last for one semester. At the end of the semester or the beginning of the next semester, the member will meet with the Board and the Graduate Advisor to discuss whether to restore normal status, extend the probationary period another semester, or to terminate membership.

5. Termination:

- a. A member may have his membership terminated by the Graduate Advisor, with or without the suggestion of the Board, if the member has consistently acted in a manner that is in direct contradiction to being a Man of God, and a member of Alpha Iota Omega (i.e. falling away from the faith, sinning without true repentance) and has not responded to other disciplinary action. In this case, the member does not have to meet

before the Board and Chapter, but is strongly suggested that he did so to explain his termination.

- b. The Undergraduate Board and/or Chapter can appeal to suggest to the Graduate Advisor to terminate someone's membership, but cannot solely terminate membership without approval of the Graduate Advisor.

6. Disciplinary actions for the Undergraduate Board will include:

- a) The Board members are subject to discipline concerning the same areas as the members.
- b) If a disciplinary action involves a Board member, the Board member will be excluded from making any decision concerning his discipline.
- c) **The Graduate Advisor must be involved directly with any disciplinary action involving Board members**

Terms & Conditions of Suspension

Terms & Conditions for a “Suspended Chapter”

Suspended chapters cannot officially participate in any national, local or campus activities with the name of Alpha Iota Omega. When a chapter is suspended each individual in the chapter becomes a “Suspended Member.” The following restrictions apply to “Suspended Chapters.”

- **Suspended chapter members are not permitted to gather for official meetings**
- The National Board will notify the office of Greek Affairs/Student Affairs concerning the suspended chapter
- When a chapter is suspended each member will follow the guidelines of a “suspended member”
- Suspended members will not be granted any representation on national boards or committees
- To appeal a suspension decision, the President of the “Suspended Chapter” must submit a letter to the National Board of Directors

Terms & Conditions for a “Suspended Member”

Suspended members are subject to the same term limits and guidelines of inactivity.

- Suspended members are not permitted participate in Alpha Iota Omega or Alpha Epsilon Omega events.
- Suspended members are not permitted participate in campus, local or national Alpha Iota Omega activities
- Suspended members are not permitted to wear Greek letters or paraphernalia during the term of suspension
- A member of a suspended chapter is not permitted to serve on the board of directors or any national committee
- Suspended members are permitted to petition a document requesting reasons for suspension from the National Board of Directors.

*Terms of suspension may be further determined with those that have delegated powers by the board.

(The Constitution and By-laws go here)

Activity Outline for the Calendar Year of an Undergraduate Chapter

REGULAR WEEKLY SERVICE:

- Two (2) hours a week of interacting and hanging out with black, white, etc. fraternity members looking for open doors to:

1. Start discussions groups (especially in white fraternities, usually located in fraternity houses)
2. Bible studies (most likely with black fraternities)
3. Two on one, or one on one evangelism and/or discipleship

Our goal is to befriend them, preach to them and invite them to a campus fellowship (with the values that AIΩ hold to) with the **ultimate purpose of getting them in a church.**

- One (1) hour Weekly Chapter Meeting
- One (1) hour Weekly Prayer Meeting

Plans for the Semester MAJOR EVENTS should include:

FALL

- Beginning of Semester Retreat/Summit
- One (1) outreach to the body of men on the campus
- One (1) community service project with a fraternity (preferably)
- One (1) Fundraiser
- Two (2) Fellowship one w/ AEΩ if present
- One (1) Major Forum w/Fraternity or Sorority
- Transition of Officers
- End of Semester reports
- Plan for next semester with specific goals in reaching fraternities

Spring

- Beginning of Semester Retreat/Summit
- Fraternity and Sorority Presidents Retreats and meetings (if it applies)
- Jesus Awareness Week outreach to the campus
- One (1) community service project with a fraternity (preferably)
- One (1) Fundraiser
- Two (2) Fellowship one w/AEΩ if present
- One (1) Major Forum w/Fraternity or Sorority
- End of Semester reports
- Plan for next semester with specific goals in reaching fraternities.

Summer School

- Meet once a week to pray and encourage one another.
- Build contacts with fraternity members

THE ORDER OF CHAPTER MEETINGS

1. Prayer	10 minutes
2. Recite Purpose	1 minute
3. Approve the minutes from last meeting	4 minutes
4. Word of encouragement	5-10 minutes
5. Chapter Events Updates	10-15 minutes
6. Testimonies pertaining to Greek organization members	10-15 minutes
7. Tying up loose ends for the major events	10-15 minutes
8. Necessary admin with the University	5-10 minutes

THE CONTENT OF PRAYER MEETINGS

- Worship, Praise God
- Pray for ΑΙΩ
- Pray for Fraternities (specific members)
- Pray for ΑΕΩ
- Pray for National Leaders

Strategy Sequence

Our ministry can be compared to John the Baptist's ministry with Jesus. He himself was not the end, but he was pointing people to Jesus. We are not the end or the holding tank in and of itself but we are to evangelize to fraternity members, invite them to fellowship meetings and the local church, and disciple them. We want to see them put into a campus fellowships and a local church. Through the methods of:

1. Personal Evangelism
2. Red Pill Forum (Keep an attendance sheet for these that goes into the impact list)
3. Bible Studies
4. Co-sponsoring events, community service, and interactive gatherings with fraternities
5. Invitations to Church or Campus Fellowship (ie. VCM, introduce the fraternity members to a Campus Minister)

Goal Setting: Keep a population map of each fraternity to make sure each chapter has every member personally hear and challenged with the gospel. Begin with the fraternities that God has already opened, and then extend into other fraternities that God is opening up. In two years you should have a "foot in the door" at each fraternity.

For the above and any other outreach strategies, you should develop an ongoing **"Impact list"**: a list that allows everyone to see what Greeks are being ministered to by you. This should be written down on paper and talked about in the weekly chapter meetings, given to the advisor monthly (or more), and the progress should be charted.

"Progression Diamond"

- ❖ FIRST BASE – friendship and sharing the gospel
- ❖ SECOND BASE – born again
- ❖ THIRD BASE – in a fellowship and ongoing discipleship

❖ HOME – local church

Each member of AIΩ should have a minimum of **3 new fraternity guys** each semester that they taking through the progression diamond. Just look where you are; in your classes, clubs, organizations, etc.

As you discern, if you would like help in bringing people across the line of faith, you can enlist AIΩ campus staff, AIΩ graduate, or local campus staff for both ministry and contact purposes. Specifically, if you desire help to get the person from first to second base and from second to third base.

The relational leadership of the advisor will help fraternity members to become a part of Bible based, Spirit-filled, and full gospel churches.

The campus staff or church contact will not replace your personal relationship and ministry with the fraternity members.

Non Board Positions & Committees

The following officers are not members of the executive board of Alpha Iota Omega, yet are vital positions for the effective operation, communication, and strategy of organization. The Board reserves the privilege to allow the following non-board positions to form committees that assist in accomplishing the duties of each non-board position.

Administrative Assistant

The person in this position will be responsible for assisting the Vice President and Secretary.

Fellowship Coordinator

The person in this position will be responsible for coordinating fellowship events within & between AIΩ and with other Greek organizations. Occasionally, this person will coordinate a fellowship that will provide an alternative activity for Christians on campus.

Program Coordinator

The person in this position will be responsible for coordinating programs that are directed towards Greeks that educate them about Christ through forums, workshops, and other means. They may work jointly with Greek fraternities or sororities to do so. They may also coordinate programs honoring excellence in scholarship, raising the standard.

Community Service Coordinator

The person in this position will be responsible for coordinating community service projects with Greek fraternities & sororities. *Occasionally*, the Community Service Coordinator will organizes AIΩ joint projects that involve feeding the hungry, clothe the poor, encourage the prisoner and visit the sick. This person is also responsible for gather the community service hours at the end of each semester.

Historian

The person in this position will be responsible for recording in a journal significant events in the brotherhood as well as taking pictures and video-taping these events. When called upon, this person should be able to contact graduate members of AIΩ and also recall important events and decisions made by AIΩ.

Public/Greek Relations Coordinator

The person in this position will be responsible for coordinating the creation and distribution of any publications that need to be made for the programs of AIΩ. This person will also keep the campus and community informed about AIΩ. He should keep up with the latest Greek events on both the national and local level.

This person is responsible for creating all public displays of AIΩ, such as display boards and banners

Step Master

The Stepmaster will responsible for coordinating any practice, events, or cost with step. The role of stepping is to be strategic and beneficial to the vision of AIΩ. The Stepmaster must submit a half-page letter explaining the event the organization would like to step at and the purpose for doing so to the graduate advisor. The graduate advisor will decide if the

organization will participate. The show must be prepared and shown to the Graduate Advisor two weeks prior to the performance. If it isn't ready, they will have a 24-hour emergency period to prepare it. The Advisor will make a decision from this point. There may be exceptions, but the G.A. makes the final decision.

Web Master

This person is responsible for posting and maintaining the web page. New information should be added by every chapter meeting or every two weeks.

Officer Training

Officer training is essential and mandatory to ensure the smooth transition year to year for the organization. Current officers will choose one weekend during the transition period for the training to occur with newly selected Board members. Each current Board member will train each newly selected Board member thoroughly in their new responsibilities as a Board member. Training will happen more specifically on our procedures concerning confrontation (Matt. 18:15-17), meetings, projects, & duties.

ATTACHMENT/EXHIBIT _____ 4

2003 – 2004 OFFICIAL UNIVERSITY RECOGNITION AGREEMENT FOR UNC-CH STUDENT CO-CURRICULAR ORGANIZATIONS

Thank you for your interest in official University recognition of your student co-curricular organization. The University of North Carolina at Chapel Hill supports an atmosphere where students can openly share ideas, interests, and concerns. Through involvement with co-curricular activities and attendance at programs sponsored by student groups, students can develop their skills, knowledge, attitudes, and behaviors in regard to ethics, pluralism, communications, management, vision, and aesthetics, as well as find opportunities to confront and discuss ideas that may be new to them. Involvement in co-curricular activities plays an important and complementary role to learning in the classroom and the University strongly supports student creation of and involvement in organizations. For official University recognition and access to state, public resources

WHAT YOU NEED TO DO:

- A. Find an advisor for your organization [see: http://carolinaunion.unc.edu/activities_orgs/handbook/official_recognition.html].
 - Any full-time employee (faculty, staff, or extended the privileges thereof) of the University of North Carolina at Chapel Hill or UNC Hospitals can serve as your organization's advisor.
- B. Prepare a governing document for your organization, either a Constitution (and Bylaws, if required) or a Statement of Purpose.
 - Outlines and sample copies are available at http://carolinaunion.unc.edu/activities_orgs/handbook/statement_purpose.html and http://carolinaunion.unc.edu/activities_orgs/handbook/sample_constitution.html.
- C. Please read this page thoroughly. Have your primary contact and your organization advisor sign two copies confirming your agreement; return one to the address below (keep the other for your files). NOTE: you are signing a binding agreement between your organization and the University of North Carolina at Chapel Hill.
- D. Complete the Application for Official University Recognition.

WHAT YOU NEED TO KNOW:

- A. The majority of your organization's membership must be full-time, registered students of the University of North Carolina at Chapel Hill.
- B. All major officers of your organization must be full-time, registered students of the University of North Carolina at Chapel Hill.
- C. The organization must comply with University policies, including University policies on non-discrimination. The University of North Carolina at Chapel Hill is committed to equality of employment and educational opportunity in compliance with applicable federal, state, and local laws. The University does not discriminate in access to, or treatment or employment in, its programs and activities based on age, race, color, sex, national origin, religion, disability, or veteran status. It is the policy of the University of North Carolina at Chapel Hill that sexual orientation be treated in this same manner. In keeping with applicable law and University policy, membership and participation in your organization must be open without regard to age, race, color, national origin, religion, disability, veteran status, or sexual orientation. Membership and participation in your organization must also be open without regard to gender, unless exempt under Title IX.
- D. The organization must comply with applicable federal, state, and local laws, including but not limited to state laws related to hazing and alcoholic beverages.
- E. Your organization must provide students with disabilities accessible programming and facilities including, but not limited to, physical location, alternative printed materials and web pages, and communications (e.g., sign language interpreters).
- F. Your organization may be required to affiliate with appropriate University of North Carolina at Chapel Hill departments or offices (Greek Affairs, Campus Recreation). Contact those offices for further information prior to signing this agreement and submitting an application.
- G. If you are starting a new organization, you may reserve University space for two organizational meetings prior to receiving Official University Recognition status. Room reservations are made through the Events Planning Office, 3509 Frank Porter Graham Student Union (9:00 a.m. - 4:00 p.m., Monday - Friday, 966-3832/962-4408).
- H. Your organization must have an advisor who is a full-time member of the faculty or staff of UNC-CH or UNC Hospitals or is extended the privileges thereof.

OFFICIAL UNIVERSITY RECOGNITION INCLUDES:

- A. Use, through reservation, of specified University facilities, property, services, or equipment pursuant to the University of North Carolina at Chapel Hill's Facilities Use Policy.
- B. Use of the University's name in the organization's title, so long as University sponsorship or endorsement is not implied or stated. If you desire to use the University's name as part of your organization's name, it should follow one of these forms.
 - "[The] University of North Carolina at Chapel Hill..." "UNC-CH..." or "UNC-Chapel Hill..." or "Carolina..." not "UNC..."
- C. Access to funding from the Student Activity Fee that is legislatively apportioned by the Student Congress.
- D. Assistance of the Division of Student Affairs including, but not limited to, Carolina Leadership Development, Carolina Union, Disability Services, Greek Affairs, and the Student Activities Fund Office. Available are: leadership training and educational workshops, general organizational advisement, assistance in publicity and marketing, program planning advisement, reference materials, and more.

BY SIGNING THIS AGREEMENT ON BEHALF OF MY ORGANIZATION, I CERTIFY MY OWN AND MY ORGANIZATION'S UNDERSTANDING AND ACCEPTANCE THAT:

- A. Official recognition does not mean that the University endorses the viewpoints of the organization.
- B. Recognition expires annually on SEPTEMBER 30TH of the next academic year, unless withdrawn earlier for cause.
- C. Materials submitted in conjunction with a request for official recognition (application, agreement, constitutions, etc.) are considered public information and will be provided to any persons on written request to the Office of University Counsel.
- D. My responses on the application must be truthful statements. If reasonable grounds exist to believe responses are false, the matter will be reported to officials of the judicial system as possible violations of the Code of Student Conduct.
- E. Recognition may be withdrawn or denied should it be determined the application contains false information, the majority of the organization's members are not full-time, registered UNC-CH students, all major officers of the organization are not full-time, registered UNC-CH students, the organization has no faculty/staff advisor, the organization fails to comply with University policies, including University policies on non-discrimination, or if the organization fails to comply with applicable federal, state, or local laws. Recognition status also may be changed by sanctions imposed by student or Greek judicial procedures.

Signature of Organization's Primary Contact _____ Date: _____

Printed Name of Primary Contact: _____ E-mail: _____

Signature of Organization's Advisor _____ Date: _____

Printed Name of Advisor: _____ E-mail: _____

For (Name of Organization): _____

IF YOU HAVE QUESTIONS OR CONCERNS, PLEASE CONTACT JON CURTIS, JON@EMAIL.UNC.EDU OR CALL 962-1461.

PLEASE MAKE TWO COPIES OF THIS AGREEMENT. KEEP ONE COPY FOR YOUR FILES AND GIVE ONE TO YOUR ADVISOR. RETURN THIS ORIGINAL TO:

Jon Curtis, Assistant Director for Student Activities and Organizations
Suite 3512 Frank Porter Graham Student Union Building UNC-CH
Chapel Hill, North Carolina 27599-5210

THANK YOU. YOU WILL BE CONTACTED REGARDING THE APPLICATION FOR OFFICIAL UNIVERSITY RECOGNITION.

ATTACHMENT/EXHIBIT 5

**POLICIES and PROCEDURES**

THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL UNC HOME DIRECTORIES SEARCH DEPARTMENTS

September 6, 2001

MEMORANDUM

TO: Deans, Directors, and Department Chairs

FROM: James Moeser

RE: Policy Statements on Non-Discrimination

I write to reaffirm the University's policy with respect to equal employment and educational opportunity. It is our policy with respect to employment terms and conditions and educational programs not to discriminate on the basis of age, sex, race, color, national origin, religion, or disability. A copy of the University's EPA and SPA Equal Opportunity Plans are available on the University's website at <http://www.unc.edu/depts/eooada/>.

In addition, the University has adopted an internal policy on non-discrimination on the basis of sexual orientation. That policy provides that educational and employment decisions should be based on individuals' abilities and qualifications and should not be based on irrelevant factors or personal characteristics that have no connection with academic abilities or job performance. Among the traditional factors which are generally "irrelevant" are age, sex, race, color, national origin, religion, and disability. It is the policy of The University of North Carolina at Chapel Hill that an individual's sexual orientation be treated in the same manner. Such a policy ensures that only relevant factors are considered and that equitable and consistent standards of conduct and performance are applied.

This policy prohibiting discrimination on the basis of sexual orientation does not apply to the University's relationships with outside organizations, including the federal government, the military, ROTC, and private employers. A copy of the University's policy on non-discrimination on the basis of sexual orientation may be found on the University's website at <http://www.ais.unc.edu/hr/spaman/> in the section on equal employment opportunity.

Any employee of The University of North Carolina at Chapel Hill having a complaint of discrimination should notify the immediate supervisor (excluding the alleged harasser), the Human Resources Counseling Service, the Equal Opportunity Officer, or the University Sexual Harassment Officer for counseling and advice. A student should notify the Office of the Dean of Students or the University Sexual Harassment Officer.

I would appreciate it if you would bring this matter to the attention of all University employees in your area. **To the extent that your department publishes materials that contain the University's non-discrimination statement, please make every effort to include all bases of non-discrimination (age, sex, race, color, national origin, religion, disability and the special provisions regarding sexual orientation) in that material.** If

you need assistance in reviewing your materials or have additional questions, please contact Susan Ehringhaus, Vice Chancellor and General Counsel, at 962-1219 or Joanna Carey Smith, Assistant University Counsel, at 962-6976. This matter deserves our careful attention, and I thank you for your assistance.