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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding no.	91267937
Party	Defendant Stroll to the Polls, Inc.
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Signature	/was/
Date	10/28/2024
Attachments	Third Applicant Notice of Reliance 91267937 - 2024-10-28a.pdf(140400 bytes) Exhibit A - Dorcas Washington Deposition.pdf(2721057 bytes) Exhibit B - Erin Philpot Deposition.pdf(4213950 bytes) Exhibit C - 97722458.pdf(99902 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

<div>Alpha Kappa Alpha Sorority Opposer,</div> <div>v. Stroll to the Polls, Inc.</div> <div>Applicant.</div>	<div>Opposition No. 91267937</div> <div>Mark: STROLL TO THE POLLS</div> <div>Serial No. 90012428</div> <div>Filed: June 20, 2020</div> <div>Published: November. 03, 2020</div>
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APPLICANT’S THIRD NOTICE OF RELIANCE

PLEASE TAKE NOTICE that, pursuant to Rules 2.122(d), 2.122(e), and 2.122(g) of the Trademark Rules of Practice, Stroll to the Polls, Inc. (“**Applicant**”), by its counsel, hereby makes of record and will rely upon the following documents, attached hereto.

Exhibit A: A true and correct copy of the deposition transcript of Dorcas Washington, a witness for Opposer Alpha Kappa Alpha Sorority (“**Opposer**”) and the errata sheet for the Dorcas Washington deposition transcript that was provided, on or about October 17, 2024 to Applicant’s counsel by Opposer’s counsel. This testimony is relevant to at least the following issues: lack of standing; lack of likelihood of confusion in International Class 25, including, but not limited to the lack of use; lack of priority; abandonment; and Opposer’s failure to establish that Applicant’s mark does not function as a source indicator and as a registerable trademark.

Exhibit B: A true and correct copy of the deposition transcript of Erin Philpot, a witness for Opposer. This testimony is relevant to at least the following issues: lack of standing; lack of likelihood of confusion in International Class 25, including, but not limited to the lack of use; lack of priority; abandonment; and Opposer’s failure to establish that Applicant’s mark does not function as a source indicator and as a registerable trademark.

Exhibit C: A true and correct copy of a June 14, 2024, print out of USPTO electronic records (TSDR) for U.S. Registration No. 7,390,472, retrieved from the Trademark Electronic Search System. This document is relevant to the defense of unclean hands and abandonment.

Dated: October 28, 2024

Respectfully submitted,
By: /s/ Willard A. Stanback
Willard A. Stanback
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the attached Applicant's Third Notice of Reliance was served on the Attorney for the Applicant on the date listed below via email:

JESSICA A. EKHOFF
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Dated: October 28, 2024

By: /s/Willard A. Stanback
Willard A. Stanback, Esq.

Exhibit A

IN THE UNITED STATES
PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

ALPHA KAPPA ALPHA SORORITY,)
) Opposition No.
) 916267937
Opposer,)
)
-vs-)
)
STROLL TO THE POLLS, INC.,)
)
Applicant.)
_____)

ZOOM VIDEO CONFERENCE
DEPOSITION OF:
DORCAS ELAINE WASHINGTON

T R A N S C R I P T of the stenographic notes of the
proceedings in the above-entitled matter, as taken by
and before SANDRA BERKELAND, Certified Court Reporter
and Notary Public, held via Zoom Video Conference at
2649 Patricia Roberts Harris Place NE, Washington
D.C. on the 29th day of August, 2024 commencing at
the hour of 4:04 p.m.

SANDRA E. BERKELAND
CERTIFIED COURT REPORTER

APPEARANCES OF COUNSEL
ALL ATTORNEYS APPEARED REMOTELY

On behalf of the Opposer:

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On behalf of the Applicant:

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ALSO PRESENT:

Meka Simmons, Esq, In-House Counsel
Fadia Galinda

I N D E X

WITNESS: DORCAS ELAINE WASHINGTON

EXAMINATION

PAGE

BY MR. STANBACK

4, 53

BY MS. EKHOFF

51

EXHIBITS

Number

Description

Page

Exhibit 1 Deposition Notice

10

Exhibit 2 Amended Pretrial Disclosure

15

Exhibit 3 Trademark Office Record

18

Exhibit 4 Washington Declaration

28

Exhibit 5 DST Constitution & Bylaws

31

(Exhibits attached to transcript.)

1 THE REPORTER: The attorneys
2 participating in this deposition acknowledge that I
3 am not physically present in the deposition room and
4 that I will be reporting this deposition remotely.
5 They further acknowledge that in lieu of an oath
6 administered in person, I will administer the oath
7 remotely. The parties and their counsel consent to
8 this arrangement and waive any objections to this
9 manner of reporting.

10 Please indicate your agreement by
11 stating your name and your agreement on the record.

12 MR. STANBACK: I'll go first. Willard
13 Alonzo Stanback, agreed.

14 MR. JOHNSON: Caron Johnson, agreed.

15 MS. EKHOF: Jessica Ekhoﬀ,
16 representing the witness Dorcas Washington, agreed.

17 DORCAS ELAINE WASHINGTON,

18 having been duly sworn,

19 testified as follows:

20 EXAMINATION

21 BY MR. STANBACK:

22 Q. Ms. Washington, good afternoon.

23 A. Good afternoon.

24 Q. I'm actually on the West Coast so it's
25 afternoon for me.

1 A. It's afternoon here as well.

2 Q. Okay. Thank you for making yourself
3 available for this activity. You know we have had
4 some scheduling challenges before, so it's great to
5 be able to have this -- let's call it a deposition at
6 this time, knowing that we're on the verge of a
7 holiday weekend, so I really appreciate, and my
8 client appreciates, the availability that we have
9 here.

10 So I'm going to ask a question, just so
11 I want to make sure I'm not saying things the wrong
12 way with respect to the organization, what would be
13 your preference in terms of how we refer to the
14 sorority, be it Delta, be it DST, be it -- what's the
15 way that's most appropriate from your vantage point?

16 A. Delta is fine.

17 Q. Okay. Thank you. So I'm going to give
18 you just minimal instructions just to make sure we're
19 all on the same page with respect to the deposition.
20 As you may know, what works best in a deposition
21 context, is for people to talk one at a time,
22 especially since we have a virtual setting that we
23 have for this particular deposition.

24 So I ask you to -- a question, knowing
25 that you're represented by counsel. So if the

1 counsel has an objection, then she'll have an
2 opportunity to make that objection. If not, you
3 should go ahead and feel free to answer the question.

4 Now, that said, if I ask a question and
5 you're not clear what I'm asking, you should, please,
6 feel free to tell me you don't understand or ask me
7 to be clearer. We want to make sure, at the end of
8 the day, that your answers are as clear and clean as
9 possible and, of course, that's going to be based, in
10 part, on me asking the best questions for you to be
11 able to respond to.

12 Is there anybody else there in the room
13 with you?

14 A. No.

15 Q. Okay. Our objective is, really, just to
16 understand and ascertain what you know. Unlike a
17 normal conversation, it's kind of problematic if
18 you're going to nod or do hand gestures, so we ask
19 that you give verbal responses to the questions.
20 This makes it, of course, easier for the court
21 reporter to record the record properly in terms of
22 your responses.

23 A. Okay.

24 Q. If she doesn't understand something or
25 thinks that she needs some right clarity, I'm sure

1 Sandra is going to ask you to clarify or respond
2 verbally, and she doesn't mean any disrespect from
3 that. She is just trying to make sure we have the
4 best record in terms of the actual transcript.

5 You should feel free to ask for a break
6 if you need a break. My only concern -- my only
7 point is that if you're asking for a break, please
8 wait for there to be an answer to the question. We
9 don't want to have a break in the middle of a
10 question unless there is a situation where you
11 believe that maybe attorney/client privilege type of
12 concern. Then you can raise that or your counsel may
13 raise that and we should have you talk offline about
14 that before you answer that question. Okay?

15 A. Okay.

16 Q. Do you understand these instructions?

17 A. I do.

18 Q. And you agree to follow them?

19 A. Yes.

20 Q. Okay. Thank you. So, a couple
21 housekeeping questions. Have you ever given a
22 deposition, been a witness in a deposition before?

23 A. I have.

24 Q. About how many times, would you say?

25 A. I've done a couple.

1 Q. Okay.

2 A. I can't count but I would say more than
3 one.

4 Q. More than one. Less than five, you
5 would say?

6 A. I would say less than five.

7 Q. Okay. And I'm just trying to make sure
8 to understand how familiar you are with the process
9 having gone through it before.

10 A. Okay.

11 Q. And you understand that you're
12 testifying under oath, just as if you were sitting in
13 an open court?

14 A. I do.

15 Q. Okay. And are you taking any
16 medications or any other thing that may be going on
17 with you that could possibly have an impact on how
18 you respond to the questions?

19 A. No medications.

20 Q. Okay. So we're going to start.

21 MR. STANBACK: I don't know, Counsel,
22 Jessica, if you received the exhibits that we have,
23 the five?

24 MS. EKHOFF: No. I don't think I did.

25 Q. Okay.

1 MR. STANBACK: Caron, could you share
2 those with her?

3 MS. EKHOFF: Hold on -- oh, I see. They
4 were sent.

5 MR. JOHNSON: I sent it.

6 MR. STANBACK: Okay. It may be helpful
7 if you can share. I don't know, Ms. Washington, if
8 you're at a computer where you can be receiving
9 email. I don't need to get your email address. I
10 don't know if you want to share that over so she can
11 have her own version of it, and also Ms. Simmons, and
12 look at it on her own screen if the font is too small
13 for the screen that is going to be depicted by the
14 video.

15 MS. EKHOFF: Okay. Yes. I will. Meka
16 and Fadia, I will send this to you and you can
17 circulate.

18 MR. STANBACK: So I think we can keep
19 going. The first document is not that small in its
20 font. And it's not that massive.

21 So my screen is doing something strange
22 now. Let's see. There we go. We're going to call
23 this STTP Document 1 and, Sandra, can we mark this as
24 Exhibit 1 for our records?

25 THE REPORTER: Sure.

1 (Notice of Deposition is marked Exhibit
2 No. 1.)

3 MR. STANBACK: Caron, can you scroll
4 down?

5 MR. JOHNSON: (Scrolling.)

6 MR. STANBACK: Actually, it's a little
7 smaller than I thought. Can you make it bigger?

8 Q. So, Ms. Washington, I'm going to --
9 first, have you seen this document before?

10 A. No.

11 Q. Okay. I'll represent to you that this
12 is the notice of deposition that we provided to the
13 Alpha Kappa Alpha Sorority with respect to this
14 testimony that you're providing. And we updated it
15 so it could match up with the fact that we're doing
16 this deposition today.

17 If you look up at the top, you see a
18 reference to the Trademark Trial and Appeal Board.

19 A. I do.

20 Q. Before getting involved in this matter,
21 have you had occasion to be involved with any
22 trademark or service mark types of matters that were
23 in front of the Trademark Trial and Appeal Board?

24 A. No.

25 Q. All right. Still looking at this

1 document, you see that the Alpha Kappa Alpha Sorority
2 is listed as the opposer in this matter. Do you have
3 an understanding what it means to be an opposer in a
4 matter like this?

5 A. Yes.

6 Q. Can you elaborate on that, to the best
7 of your knowledge?

8 A. Sure. If I am -- yes. So, my knowledge
9 of it is, they're opposing the ability for someone
10 else to get an -- to get the license or to patent
11 something. So they're challenging the validity of
12 the IP.

13 Q. Okay. So just as a point of reference,
14 I think in this case, we're talking about a
15 trademark.

16 A. Okay, trademark.

17 Q. I wanted to clarify that. That's your
18 understanding, it's a trademark matter that we're
19 discussing here?

20 A. Yes.

21 Q. Have you had any interaction with Alpha
22 Kappa Alpha regarding this particular mark, Stroll to
23 the Polls, prior to you providing your declaration,
24 which, I believe, was in 2022?

25 A. With Alpha Kappa Alpha or with the mark

1 itself or with the use of Stroll to the Polls?

2 Q. With Alpha Kappa Alpha as an
3 organization.

4 A. I would say yes, in their request for
5 information about how we use ours.

6 Q. Okay. And that request was done in
7 connection with this matter or was it done separately
8 with respect to --

9 A. I don't know.

10 Q. Okay. And would you say that was in the
11 2022 time frame or before that?

12 A. I don't know. I cannot remember the
13 time frame.

14 Q. Okay. And just so you know, it is
15 perfectly fine, if you don't remember something, just
16 say you don't remember. I'd rather you do that than
17 try to guess at it.

18 A. Okay.

19 Q. All right. So, also looking at this
20 document, you see in the upper left-hand corner,
21 Stroll to the Poll, Inc. and you see them listed as
22 the applicant?

23 A. Uh-huh.

24 Q. And I think you've already answered this
25 to some accord, but what's your understanding of them

1 being the applicant with respect to this matter?

2 A. Them, as in any organization that was
3 applying for a trademark, that's all I know. I don't
4 know anything about Stroll to the Poll, specifically.
5 Only that someone applied for a trademark.

6 Q. Okay. All right. Thank you.

7 Had you had any knowledge about
8 Stroll -- sorry, STTP, Stroll to the Poll, Inc. prior
9 to the conversation that you had with a
10 representative of AKA?

11 A. No.

12 Q. Okay. And that initial conversation, if
13 you can recall, was it with a representative that was
14 a part of the organization or was it with one of
15 their outside law firms?

16 A. Neither.

17 Q. Okay. So, can you tell me who that
18 initial rep -- that initial conversation was with?

19 A. Our -- my general counsel.

20 Q. Okay. Your general counsel. Okay.

21 As your recollection -- I'm sorry, you
22 said you didn't remember. Can you strike that?

23 THE REPORTER: Yes.

24 Q. And you understand that you're providing
25 testimony regarding this matter that is presently in

1 front of the Trademark Trial and Appeals Board,
2 specifically with respect to Stroll to the Polls and
3 the application that was filed by Stroll to the
4 Polls, Inc.?

5 A. Yes.

6 Q. Okay. One last thing before we get off
7 Exhibit 1. Up in the top corner, to the right, there
8 is some additional information. Can you zoom in on
9 that?

10 A. That's fine. I can see it.

11 Q. And do you see the date next to the
12 word, "Filed"?

13 A. Yes.

14 Q. Okay. And what is that date that you
15 see?

16 A. It says June 2020 -- June 20, 2020.

17 Q. All right. Thank you. All right.

18 MR. STANBACK: Mr. Johnson, we're going
19 to go and move from that document and we're going to
20 go now to STTP Document 002.

21 And before we get to that, Jessica, did
22 you have an opportunity to send that document -- set
23 of documents out? I want to make sure that people
24 have them that they can -- Ms. Washington can pull it
25 up.

1 MS. EKHOFF: Yes. I sent them out.

2 MR. STANBACK: Okay.

3 Q. So, Ms. Washington, when that comes in,
4 you should feel free to toggle from one screen to the
5 other, if it's easier for you to read on a separate
6 screen. I'm saying that specifically because,
7 normally, we don't like people going into their
8 emails while they're in the middle of a deposition.

9 A. That's fine. I'll see. If I'm not able
10 to see, then I will do that. We can go with the
11 shared screen for right now.

12 Q. Okay. Thank you. All right.

13 So we have on THE screen right now STTP,
14 Document No. Two.

15 MR. STANBACK: Sandra, can we enter that
16 as Exhibit 2?

17 THE REPORTER: Yes.

18 (Amended Pretrial Disclosures is marked
19 Exhibit No. 2.)

20 MR. STANBACK: Mr. Johnson, can you
21 scroll down?

22 MR. JOHNSON: (Scrolling.)

23 Q. We're going to take a little time and
24 let him scroll through so you can see all the
25 different pages so you can see three of them, max.

1 MR. STANBACK: Caron, is that the last
2 page?

3 MR. JOHNSON: Yes.

4 Q. Ms. Washington, I wasn't expecting you
5 to read all that as he was scrolling through it. I
6 wanted to make sure you had a reference, a sense of
7 what the document was. Now I'm going to drill down a
8 little more into the document.

9 A. Okay.

10 Q. So as you can see at the top, this is
11 also related to the matter of Alpha Kappa Alpha
12 Sorority versus Stroll to the Polls, Inc. You see
13 the opposition number that's on the side there on the
14 top. I'll represent to you that this document was
15 filed by counsel for AKA, the sorority, during the
16 time that we were earlier in time of this particular
17 matter.

18 I'd like for you to focus on the top of
19 the second page. Do you see a reference to yourself
20 there?

21 A. Yes.

22 Q. Is that address there still correct?

23 A. That is. That is the address of the
24 office.

25 Q. And from the address you gave before,

1 sounds like you're not in the office right now?

2 A. No. I'm at my residence.

3 Q. Okay. You also see a title -- looks
4 like a title for you?

5 A. Correct.

6 Q. And is that the correct title?

7 A. It is.

8 Q. All right. And then the third box.

9 MR. STANBACK: Caron, can you go back up
10 for a second?

11 Q. The column for the third box, can you
12 read that, Ms. Washington?

13 A. General Summary of Testimony Subjects.

14 Q. Okay. And do you see what is in the box
15 that is associated with your name?

16 A. Yes. Would you like for me to read it?

17 Q. That would be great. Thank you.

18 A. "Use of the phrase 'stroll to the polls'
19 by Delta Sigma Theta Sorority, Incorporated."

20 Q. Okay. All right. Are you a member of
21 Delta Sigma Theta Sorority, Incorporated?

22 A. Yes.

23 Q. And when did you pledge?

24 A. Initiated November 24, 1985.

25 Q. Okay. And which chapter?

1 A. Kappa Upsilon Auburn University.

2 Q. Okay. I'd like to -- so we're going to
3 go into some questions, a little later, regarding the
4 subject that is in this box that is associated with
5 your name which is the use of the phrase Stroll to
6 the Polls by Delta Sigma Theta, Incorporated, but
7 before we do that, I'd like to pull up another
8 document.

9 MR. STANBACK: Caron, can you pull up
10 STTP document No. 3?

11 Can we enter this as Exhibit 3?

12 THE REPORTER: Yes.

13 (Trademark/Service Mark Application is
14 marked Exhibit No. 3.)

15 MR. STANBACK: Coran, can you scroll
16 down a little bit? Scroll through some of the pages.

17 MR. JOHNSON: (Scrolling.)

18 Q. Ms. Washington, let us know if you need
19 us to slow down or if you can't see some of the
20 wording. Once again, I'm not asking you to read
21 these word for word. I want you to get a sense of
22 what the document is and I'll drill down a little bit
23 more.

24 MR. STANBACK: Caron, when we get past
25 these web pages, we can go back up to the top.

1 Q. Ms. Washington, have you seen this
2 document before?

3 A. I have not.

4 Q. Okay. I'll represent to you that this
5 document is a printed version of the original
6 application for the mark Stroll to the Polls which
7 was filed by STTP, the organization, on that date you
8 saw on that first document, on June 20, 2020. It's
9 something that is publically available from the
10 website of the trademark office.

11 And I'll also represent to you that this
12 application is the main focus of this matter. I'm
13 saying that, in part, because there was some other
14 applications that were filed for other -- what we
15 call classifications, but this is the focus of this
16 particular matter is just this particular
17 application, which is focused on clothing, so class
18 25.

19 A. Okay.

20 Q. Can you look to the bottom of the first
21 page and do you see the word where it says
22 Identification?

23 A. Yes.

24 Q. All right. Can you kindly read the
25 words in the adjacent column?

1 A. Sure. "Aprons; Bibs, not of paper;
2 Bodysuits; Dresses; Footwear; Hats; Jackets and
3 Socks; Pants; Shirts; Skirts; Swimwear."

4 Q. Okay. Thank you. If you look above
5 that -- I think it's above that. I think my screen
6 may be smaller than yours. Do you see --

7 MR. STANBACK: Caron, can you scroll
8 down to the next page?

9 MR. JOHNSON: (Scrolling.)

10 Q. Do you see where it says, First Use
11 Anywhere Date?

12 A. Yes, sir.

13 Q. Okay. And can you read what it says for
14 the first use anywhere date in the second column?

15 A. Yes. It says, "At least as early as
16 2018."

17 Q. And is it the same date for the First
18 Use in Commerce?

19 A. Yes.

20 Q. Okay. All right. So I'm going to step
21 away from the document for a second, or have us step
22 away. What I'd like to do now is get into
23 background.

24 A. Sure.

25 Q. So I'd like to know, for example, let's

1 start with college. So I think you already said it,
2 but can you give me an idea where you went to
3 college, about the time frame. I know I have to be
4 careful about that, and your major and things like
5 that?

6 A. Sure. I am a graduate of Auburn
7 University, Auburn, Alabama. I was there from the
8 fall 1984 until the spring of 1988. I graduated with
9 a degree in human resources management.

10 Q. Okay. And you said you crossed in '85
11 was it?

12 A. '85. November of '85. Fall of '85.

13 Q. Okay. And then after college, did you
14 go to grad school or no?

15 A. After college, first couple of years I
16 worked at a daycare center. Then I worked -- did a
17 variety of things. I moved to Wisconsin in 1992.
18 Began working in workforce development.

19 Do you want me to give you my whole
20 story?

21 Q. Yes.

22 A. I left Wisconsin 2002. I continued
23 working in workforce development. Moved to Central
24 Florida, Brevard County. Moved from Brevard County,
25 still with the same company, to Madison County in

1 Florida in 2005, I think it was, and then 2007 moved
2 to Tallahassee. Still worked for the same company.
3 This was -- started out Kaiser Group but they sold
4 the company sometime in maybe 2012 or '13 to another
5 company, but I was in Tallahassee 2007 to 2016.

6 I moved to New Jersey to work for Delta
7 Sigma Theta in October of 2016 and then I have been
8 here since. I served in the role of deputy executive
9 director at my first job at Delta and later served as
10 the executive director, where I'm currently serving.

11 Q. So deputy, started in October 2016?

12 A. Correct.

13 Q. Okay. And then your executive director
14 role started in 2020?

15 A. 2021 as acting. And then 2022 in the
16 permanent role.

17 Q. Okay. So before you got to
18 headquarters, is that the appropriate terminology?

19 A. Yes.

20 Q. Were you involved with chapter
21 activities?

22 A. Yes. I resigned as chapter president
23 when I moved to this position. So I was serving as
24 chapter president at Tallahassee alumnae chapter from
25 April of 20 -- either '12 or '13. So must have been

1 April of 2013, to October of 2020 -- 2016. I'm
2 sorry.

3 Q. Okay.

4 A. Prior to serving as chapter president, I
5 served as chapter second vice president which was
6 over programs. I served as social action chair,
7 which was over our social actives, including voting,
8 and our Stroll to the Polls activities that we did in
9 Tallahassee.

10 Q. Okay. My shorthand --

11 A. Do you want to know my other Delta
12 activities or that's enough?

13 Q. No. Yeah. Go on.

14 A. Okay. So that was a chapter. Then I
15 served in 2003 to 2007 as state coordinator for the
16 State of Florida. Then from 2011 to 2000 -- maybe
17 2016, I served as regional -- wasn't '16. I don't
18 remember the dates, I served as the regional person
19 who tracked training for the staff -- for the region.
20 So we have regional DIV training. I served in that
21 role.

22 I have to look at my resumé, but I
23 served that under Cheryl Turner as she was the
24 regional director.

25 Q. So, were you -- I'm assuming here, were

1 you pulling on some of your HR knowledge in terms of
2 that role?

3 A. Well, the Delta internal development
4 training, yes, it was training. I was also a
5 certified trainer during that time, actually since
6 2003 until, probably, 2020 when I didn't need to be
7 in front of people doing it anymore.

8 I also served as a member intake
9 trainer, a certified advisor and I advised the
10 chapter at Florida State 2014 as a primary advisor
11 and I stayed on their advisory council until I left
12 in 2016.

13 Q. Okay. So, when you were at Florida
14 State, did you have interaction with Dr. Philpot?

15 A. Not familiar with that name.

16 Q. Okay. She is someone that we know of as
17 part of this matter who was in the Florida area,
18 about the same time, I believe.

19 A. That's possible. There were a lot of
20 activities going on around going to the polls,
21 different churches, different folks. That's very
22 possible.

23 Q. Okay. Thank you for all that, I should
24 say.

25 A. You're welcome.

1 Q. For this particular matter, looking at
2 the document that was provided as the disclosure
3 document, you have knowledge about the use of Delta
4 Sigma Theta with respect to the term, Stroll to the
5 Polls. Is that correct?

6 A. Yes.

7 Q. And so you're speaking in your capacity
8 as the executive director of the organization as
9 opposed to in your individual capacity as a person?

10 A. Correct.

11 Q. Okay. Excluding your attorneys, have
12 you had any conversations with anybody else regarding
13 this matter or your pending testimony?

14 A. No.

15 Q. And --

16 A. I'm sorry. Did you say something else?

17 Q. No. No. That's my AC kicking in.

18 A. Oh, okay.

19 Q. And did you receive -- excluding
20 documents that were drafted by one of your counsel,
21 have you received any documents that you reviewed in
22 preparation for your testimony today?

23 A. No.

24 Q. So, I think I know the answer to this
25 but I'm going to ask the question anyway, were you

1 ever employed by Alpha Kappa Alpha Sorority,
2 Incorporated?

3 A. No.

4 Q. You have never been a member of Alpha
5 Kappa Alpha Sorority, Incorporated?

6 A. No.

7 Q. I would be very surprised if you said
8 anything different.

9 Have you served on any organizations
10 where representatives of Alpha Kappa Alpha may have
11 also been involved?

12 A. Yes. The NPHC council. I currently
13 work with the executive directors. So, yes.
14 National Pan-Hellenic Council.

15 Q. N as in national?

16 A. On a national level, but I also served
17 on the council in Tallahassee.

18 Q. Was that a state level?

19 A. So there are just, like, each of our
20 organizations has chapters, they have what they call
21 councils. It's a local council that is affiliated
22 with the national organization.

23 Q. So, can you remind me, again, I'm sorry,
24 because since we're talking kind of fast, what was
25 your time in Tallahassee in that area? From

1 when -- from what date to what date, approximately?

2 A. I moved to Tallahassee in 2007. I left
3 there in 2016.

4 Q. Okay. 2016.

5 A. I'm currently still a member of the
6 Tallahassee alumnae chapter.

7 Q. You're attending those meetings?

8 A. When they were online I did. But I
9 don't fly down to go to the meetings.

10 Q. Gotcha. That's somewhat understandable.
11 Going back to Exhibit 2, where it has some language
12 regarding your testimony, would you say there was
13 anyone else more knowledgeable in the organization
14 that could provide information regarding the subject
15 of the organization's use of Stroll to the Polls?

16 A. No.

17 Q. Okay. And referring back to Exhibit 3,
18 there was that identification of the goods and there
19 was that list of clothing that we had.

20 A. Uh-huh.

21 Q. Do you believe that there is anybody
22 else in your organization that would have better
23 knowledge than you regarding Delta Sigma Theta's use
24 of the terminology Stroll to the Polls in connection
25 with clothing?

1 A. I don't know.

2 Q. Okay.

3 MR. STANBACK: Coran, can we move onto
4 document No. 4?

5 Sandra, can we enter this as Exhibit 4?

6 THE REPORTER: Yes.

7 (Washington Declaration is marked
8 Exhibit No. 4.)

9 MR. STANBACK: Caron, can you scroll
10 down?

11 MR. JOHNSON: (Scrolling.)

12 MR. STANBACK: Let's go to the next
13 page.

14 MR. JOHNSON: (Scrolling.)

15 Q. Ms. Washington, can you see this one
16 pretty good?

17 A. I can, uh-huh.

18 Q. This one I'd like you to read.

19 A. Okay.

20 Q. I'm sorry. Read just to make sure
21 you're familiar with it. Not necessarily --

22 A. Read it out loud?

23 Q. You don't have to read it out loud. I
24 want to make sure you're familiar with all the
25 wording. The other ones you just scanned through. I

1 want to pause on this one and make sure, with respect
2 to all the information, you can at least eyeball it
3 and then we'll go back and drill down into some
4 things.

5 A. Okay.

6 Q. All right. So there is an electronic
7 signature -- I'm sorry. First, are you familiar with
8 this document?

9 A. I am.

10 Q. Okay. And when was it that you first
11 became familiar with this document?

12 A. This document was when I signed it in
13 August of 2022.

14 Q. Okay. And is this something that you
15 drafted?

16 A. No.

17 Q. Okay. Do you have a recollection of
18 where you may have provided individual input or was
19 this something that was drafted for you and all you
20 had to do was sign?

21 A. No. I provided individual input.

22 Q. Okay. Can you highlight for us where
23 you provided the individual input?

24 A. I would say, first off, my name.
25 Secondly, in conducting the regular business and the

1 activities, my personal recollection of using Stroll
2 to the Polls in Tallahassee, the records that we
3 have, based on our ability to go into our system and
4 find the use of it, when I say the use, our ability
5 from our program being submitted. And then from
6 information that I've seen as our use of it.

7 Q. Okay. To be complete --

8 MR. STANBACK: Caron, would you scroll
9 down to Exhibit A and B and then we'll come back up.

10 MR. JOHNSON: (Scrolling.)

11 MR. STANBACK: All right. Thank you.

12 Q. Ms. Washington, as I think you may have
13 said, this document was signed in August 2022?

14 A. Uh-huh.

15 Q. Okay. Is there anything that has
16 changed that would change your mind with respect to
17 any of these statements from the time you signed it
18 in August of 2022 up until today?

19 A. No.

20 Q. Okay. So there is no updates that we
21 need to deal with or anything?

22 A. I don't know. There is nothing that I
23 want to update.

24 Q. Okay. I'm only going with respect to
25 what you might know. There is not anything in here

1 that you think you need to change or add to?

2 A. No.

3 Q. Okay. We're going to come back to that
4 one.

5 MR. STANBACK: Mr. Johnson, can you pull
6 up document No. 5?

7 (Constitution and Bylaws 2023 Edition is
8 marked Exhibit No. 5.)

9 MR. STANBACK: Sandra, can you mark this
10 as Exhibit 5?

11 THE REPORTER: Yes.

12 Q. Ms. Washington, like before, I am not
13 going to ask you to read everything in this document.
14 Why don't you start moving --

15 MR. STANBACK: Move it down, Caron.

16 MR. JOHNSON: (Scrolling.)

17 MR. STANBACK: And I apologize for the
18 sizing. There is something kind of strange here.

19 And if Counsel is okay, I'm not going to
20 have Caron scroll through this document in its
21 entirety. I'm not going to go through every page and
22 have a question or anything about every page.

23 MS. EKHOFF: That's fine.

24 MR. JOHNSON: (Scrolling.)

25 MS. EKHOFF: Do you want to keep going

1 then or are you going to scroll through the whole
2 part?

3 MR. STANBACK: No. The first part is
4 separate from the part we just got to. I want to do
5 a couple pages here and we'll double back.

6 MS. EKHOFF: Okay.

7 MR. STANBACK: I think we have 90 pages.
8 We're not doing that.

9 MR. JOHNSON: (Scrolling.)

10 MR. STANBACK: So why don't we stop
11 there, Coran. Scroll back up to page six.

12 Q. So, Ms. Washington, does this document
13 look familiar to you?

14 A. It does.

15 Q. Okay. Based on the limited amount of
16 scrolling we did, can you tell me what it looks like
17 to you?

18 A. It's our constitution and bylaws, 2023
19 edition.

20 Q. Is there anything more up to date than
21 2023?

22 A. No. 2023 is the last update.

23 Q. All right. So Caron has stopped here
24 on, I think this is page three.

25 A. Six.

1 Q. Page six. Okay. Ms. Washington, can
2 you read the highlighted language?

3 A. Sure. "The International President
4 shall be the immediate supervisor of the Executive
5 Director."

6 Q. Okay. Was that true in August of 2022?

7 A. Yes.

8 Q. Okay. And that's still true day?

9 A. Well, let me just say the name change.
10 We did have a name change. It was not the
11 international president at that time. It was the
12 national president, but yes.

13 Q. But it was a person who had a similar
14 role and similar set of duties and responsibilities
15 and they just changed the title?

16 A. Yes. A person who is elected by the
17 body of the organization.

18 Q. Okay. Was it elected by somebody else
19 before or was it always elected by the body?

20 A. Always elected by the body.

21 Q. Okay. All right.

22 MR. STANBACK: So, Mr. Johnson, can we
23 go down to page 25 of the bylaws? I think that's the
24 next page that is highlighted.

25 MR. JOHNSON: (Scrolling.)

1 Okay. So Ms. Washington, what I'm
2 trying to make sure I understand is, as speaking on
3 behalf of the organization, how you interact with the
4 board and presidential leadership with respect to
5 your roles and their supervisory responsibilities.
6 Okay? So here we have duties of the national and
7 regional officers. Do you see that, as part of
8 Article V?

9 A. I do.

10 MS. EKHOFF: I just want to object to
11 this entire line of questioning on the grounds of
12 relevance.

13 Ms. Washington, if you know the answers,
14 you can answer.

15 MR. STANBACK: Okay. Objection noted.

16 Caron, can you scroll down to page --
17 what's the next page? Just scroll down to the next
18 highlighted area.

19 MR. JOHNSON: (Scrolling.)

20 Q. Can you read that paragraph 12 for us,
21 Ms. Washington?

22 A. Do you want me to read it out loud?

23 Q. That would be great.

24 A. "In concert with the executive
25 committee, provide organizational direction for the

1 national headquarters and serve as the immediate
2 supervisor of the Executive Director and ensure that
3 the established policies of the Grand Chapter and the
4 National Board of Directors are executed."

5 Q. Okay. So, with respect to the notion of
6 immediate supervision and with respect to what you do
7 on a day-to-day basis, would it be -- would it be a
8 normal practice, I would say, for the people who are
9 involved with your supervision to be involved with
10 your work with respect to this matter?

11 What I'm trying to get at is, is this
12 something with respect to the organization's
13 involvement with this opposition, is this something
14 that would have to be signed off on by your -- the
15 executive committee, or somebody at that level, or is
16 this something that is in your purview in terms of a
17 decision to be involved?

18 A. I want you to rephrase the question
19 because I'm not sure I understand what you're asking.
20 So if you could rephrase the question.

21 Q. Okay. So, when there was -- I think you
22 told me your general counsel was the person who
23 introduced you to this matter?

24 A. Correct.

25 Q. Is this something when this matter was

1 introduced to you, as the executive director, that
2 there was a need for you to get approval from your
3 immediate supervisors to get involved with the matter
4 and to do the declaration?

5 A. Approval? No.

6 Q. Okay.

7 A. Concurrence, I believe that was done
8 before it was brought to me.

9 Q. Okay. In terms of communication -- I
10 didn't get that first word you said.

11 A. Concurrence.

12 Q. Concurrence. So there was a discussion
13 and there was some knowledge at the -- your
14 supervisor level that you would be involved, in terms
15 of creating and signing the declaration?

16 A. Yes.

17 Q. Okay. All right.

18 MR. STANBACK: Coran, could you go down
19 to page 33? I may not get into a lot of details here
20 but why don't we move down to 33.

21 MR. JOHNSON: (Scrolling.)

22 MR. STANBACK: All right. Go to the
23 next highlighted area.

24 MR. JOHNSON: (Scrolling.)

25 MR. STANBACK: Okay. I'm good. Do we

1 have anything else highlighted? I don't believe we
2 do. Oh, yes we do. There is a big section at the
3 bottom, page 53, I believe.

4 MR. JOHNSON: (Scrolling.)

5 MR. STANBACK: No. Skip that.

6 MR. JOHNSON: (Scrolling.)

7 MR. STANBACK: Okay.

8 Q. So Ms. Washington, is it -- am I correct
9 in understanding that this whole section here,
10 basically, is kind of like what I'll call your
11 marching orders in terms of what you do at the
12 national office?

13 A. It's the framework for it.

14 Q. Okay. And why don't you scroll down a
15 little more, Caron, so counsel can see what we're
16 talking about here.

17 MR. JOHNSON: (Scrolling.)

18 Q. And is this framework the same in 2022
19 as it is today?

20 A. It was similar. It was not listed like
21 this in the constitution and bylaws.

22 Q. Okay. So I want to ask about your
23 day-to-day operations with respect to merchandising.
24 So, is it your office that would manage the sign off
25 in terms of approvals on the use of the

1 organization's insignia?

2 A. Yes.

3 Q. Okay. And my understanding is that the
4 organization does have a few trademarks that have
5 been registered over time?

6 A. Yes.

7 Q. Have you, based on your understanding
8 and your role, have you opposed anyone's trademark
9 applications in the -- in your history?

10 A. I don't know.

11 Q. Okay. From your recollection, have you
12 opposed anybody?

13 A. I don't know. I don't have a
14 recollection of that.

15 Q. Okay. Not a problem.

16 So what's the process for someone to get
17 approval to use the marks of the sorority or the
18 insignia?

19 A. We have a license that is available on
20 our website so the application is completed. There
21 is a fee. Then there is an approval process that
22 reviews products, the use of information and sent
23 back whether we license them or not.

24 Q. Okay. And is that fee structure also
25 applicable to chapter uses of products that have the

1 insignia on it or trademark?

2 A. If a chapter is using it, the chapter is
3 an affiliate of Delta Sigma Theta, so they don't
4 necessarily need to have a license. If they purchase
5 something, or curate something, that is using our
6 mark, then that vendor needs to be licensed. If a
7 chapter is using it for their own use, then they
8 would not need to.

9 We encourage them to use our licensed
10 vendor so they don't have to go through anything
11 extra.

12 Q. In your capacity working in this area
13 with the trademarks and merchandise, has there been
14 any occasion where the sorority has had to license
15 somebody else's trademarks or service marks?

16 A. That we've licensed someone else's? I'm
17 not aware of that. I don't know.

18 Q. Well, you think that you might have but
19 you're not sure or you don't think it's happened at
20 all?

21 A. I can't speak to that. I'm not that
22 closely -- I don't look that closely at it unless
23 it's brought to me.

24 Q. Okay. And would it be part of your
25 process that if the organization wanted to license

1 somebody else's trademarks or service marks, would it
2 be brought to you specifically?

3 A. Yes. As a final signer and
4 acknowledging that we were doing it.

5 Q. Okay. And do you have a process for
6 that as somewhat parallel to you licensing out? Do
7 you have a license in process?

8 Ms. Washington, are you there?

9 A. Hello.

10 Q. You froze for a second.

11 A. I'm not sure that I understand your
12 question.

13 Q. So, it sounded like you have a process
14 for if somebody, or a vendor or somebody, wants to
15 license the Delta marks, right, so they come to get
16 the application, fill it out and send to whoever gets
17 to approve it. You track, you know, whatever they're
18 going to pay in the fees. All those type of things.
19 Is that somewhat accurate?

20 A. Correct.

21 Q. So my question is, to the extent that
22 something would be licensed in to the sorority,
23 would -- is there a similar process that you already
24 have in place with respect to somebody licensing
25 trademarks or service marks that could be used by the

1 sorority?

2 A. So, we have our sponsors or any of our
3 partners, sure. We have a license that allows us to
4 use their IP on our website or in other spaces if
5 we're working together.

6 Q. Okay.

7 A. So yes, there is a process for that.

8 Q. So a similar, kind of, approval type of
9 thing with everybody who is associated --

10 A. Yes.

11 Q. Okay. Thank you for that.

12 Going back up to something we discussed
13 a little bit before. Am I correct in paraphrasing
14 that you first became aware of the matter between
15 Alpha Kappa Alpha and Stroll to the Polls, Inc. when
16 your counsel reached out to you, your in-house
17 counsel?

18 A. Yes.

19 Q. Okay. So without getting into what
20 could be considered attorney/client privilege, so I'm
21 teeing that up for your two counsel if they want to
22 think they might need to object. Was all the
23 communication, with respect to your declaration, to
24 you through your in-house counsel or was there other
25 conversations or communications with outside counsel

1 for AKA?

2 A. I've never spoken to outside
3 counsel -- oh, sorry, Jessica.

4 MS. EKHOF: I just want to instruct the
5 witness not to divulge the content of any
6 conversations that you may have had either with me,
7 as your outside counsel, or with your in-house
8 counsel.

9 THE WITNESS: Okay.

10 Q. And that's exactly what she was supposed
11 to say.

12 A. I'm not divulging anything. I have not
13 spoken to Jessica until today, so...

14 Q. Okay. I appreciate that.

15 MR. STANBACK: Mr. Johnson, let's go
16 back to Exhibit 4.

17 Q. And Ms. Washington, just so you know, we
18 only have five exhibits so we're not going to be that
19 much longer.

20 A. Okay.

21 Q. Let's go down to Exhibit A. From your
22 position as executive director, Ms. Washington, can
23 you give me some information about the origins of
24 this exhibit?

25 A. The origins, I need a little more

1 explanation.

2 Q. Can you tell me about the activity that
3 is presented in the exhibit, why was the exhibit
4 made, why was this flyer made, what was going on in
5 2012, those type of things.

6 A. Okay, so I was not in the position at
7 that point. I was actually in a chapter.

8 Q. Okay.

9 A. But what I can say is, from this flyer,
10 during that period of time, we were all working to
11 get out to vote. That is one of our major
12 initiatives is to get people to go to vote and it
13 appears, just based on what I'm looking at, is that
14 early bird voting was starting, or they were getting
15 people -- encouraging people to do early voting.

16 This was a chapter in Georgia, so it's
17 typical of the things that we do as a part of our
18 regular programming, our get out to vote activities.
19 So that's all I can see on here is that it's
20 something that is advertising one of our typical
21 pragmatic activities.

22 Q. Okay. So is it correct to say then that
23 with respect to this particular activity, you didn't
24 have any firsthand knowledge about the planning of it
25 or the execution of it, and the knowledge that you

1 have with respect to this particular activity in
2 July 21, 2012 is just based on this particular
3 document?

4 A. This document and the history of our
5 organization.

6 MR. STANBACK: Okay. So -- all right.
7 Can we go to Exhibit B, Caron?

8 MR. JOHNSON: (Scrolling.)

9 Q. So, likewise, can you tell me a little
10 bit about what was going in the creation of, I guess,
11 this is a button that was provided?

12 A. Uh-huh.

13 Q. Can you tell me when it was created and
14 what it's being used for or anything like that?

15 A. I don't know when it was created.
16 Generally, what a button is used for is to wear as a
17 part of your outfit when you're going out to stroll
18 to the polls or get out to vote activities. Beyond
19 that, I cannot tell you when it was created, where it
20 was created and how it was distributed.

21 Q. Okay. So, with respect to anything --
22 strike that.

23 I just want to make sure I understood
24 something correctly.

25 MR. STANBACK: Coran, can you go back up

1 to the declaration page?

2 MR. JOHNSON: (Scrolling.)

3 Q. So Ms. Washington, it looks like, from
4 your paragraph three, that the button may have been
5 used in the July 21, 2012 time frame. Is that an
6 accurate understanding that I should be gleaning from
7 the wording you have here?

8 A. I think what's accurate is that between
9 then and now, or then until the time that this was
10 presented, that the button was presented. Not any
11 specific date or time frame, but in the course of the
12 ten years, the button was created.

13 Q. All right. So I'll say, with respect to
14 Exhibit A, is that correct it has a particular date
15 on it?

16 A. Correct.

17 Q. And so I don't want to put words in your
18 mouth, but what it sounds like I'm hearing is that
19 with respect to the button, you're not exactly sure
20 what the time frame was but you think it was sometime
21 after July 21, 2012?

22 A. I think it was sometime before
23 August 20th, whatever, 2022. August 12, 2022.

24 Q. Okay.

25 A. That is what I can attest to, that it

1 was before then.

2 Q. Okay. So, you had suggested, I believe,
3 and like I said before, you can correct me if I'm not
4 paraphrasing what you said accurately, but you
5 suggested that there were other times when the
6 sorority was using Stroll to the Polls. Can you
7 elaborate on some of those instances from your
8 recollection?

9 A. So, in my chapter, we partnered with
10 different people in Tallahassee to do it, so I
11 cannot, specifically, find evidence, but my personal
12 recollection of stroll to the polls, being an
13 activity that my chapter engaged in, my chapter of
14 Delta Sigma Theta engaged in the Tallahassee, Florida
15 community was stroll to the polls, to move around
16 and, again, to get people to walk even from church to
17 the polling places to do different things, so that
18 terminology was used.

19 Q. What was that time frame? This is
20 Tallahassee is -- you told me dates. 2000 --

21 A. I was president -- yeah. I was -- I
22 can't tell you when exactly. I was president in '13
23 but I was social action chair prior to that, so I
24 can't give you any particular dates.

25 Q. Okay. Sometime between, and you correct

1 me if I am wrong, in Tallahassee, I have in my notes
2 2007 to 2016.

3 A. Uh-huh.

4 Q. Okay. So sometime in that timeframe is
5 what we're talking about?

6 A. Correct.

7 Q. Okay. And was this a phrase in the --
8 as used by the sorority, used in multiple instances
9 where there were elections?

10 A. I don't know.

11 Q. Okay. Do you have any knowledge or
12 recollection that when this phrase was used, in
13 connection with these activities, were there any --
14 was there any merchandise that was sold that had this
15 phrase on it during that time frame?

16 MR. STANBACK: Did we just lose
17 Ms. Washington?

18 A. Hi.

19 Q. You trying to skip out on us? What's
20 going on there?

21 A. I don't quit. I'm not a quitter.

22 Q. All right. I'll take that.

23 A. I'm not a quitter. I thought I was
24 losing you. I didn't know. The last question that
25 you asked me had to do with Tallahassee.

1 Q. Yeah. My question was, do you have a
2 recollection of any merchandise or clothing being a
3 subset of merchandise that was sold during that time
4 frame of your recollection of the use of the
5 terminology, Stroll to the Polls, was there any type
6 of sale of goods happening at the same time that had
7 that terminology on the goods?

8 A. I don't know.

9 Q. One of the other things, if I remember
10 correctly, you said that there were other people that
11 were involved with some of these campaigns. I'm not
12 going to characterize them one way or the other what
13 type of campaign it was. But can you give us an idea
14 who some of those organizations were?

15 A. Local churches, the National
16 Pan-Hellenic Conference -- Council, I'm sorry. So it
17 was an organized -- many of our activities were with
18 other people.

19 Q. Okay. And do you have a recollection
20 whether or not any of those organizations were using
21 terminology, Stroll to the Polls, independent of you
22 and your involvement?

23 A. I don't.

24 Q. Can we take a break for five minutes?

25 MR. STANBACK: Counsel, you okay with

1 that?

2 MS. EKHOFF: Yes. That's fine.

3 MR. STANBACK: Okay.

4 (Recess is taken.)

5 MR. STANBACK: Sandra, back on the
6 record.

7 Q. Ms. Washington, just a little bit more.
8 I want to make sure I understand, with respect to
9 your testimony with respect to the use of Delta Sigma
10 Theta, the terminology Stroll to the Polls, is it
11 correct to say that you were basing it on activities
12 that occurred primarily when you were not in the role
13 of executive director?

14 A. I'm not sure that I am. Well, yeah.
15 Actually, I am. I'm basing it on that but that
16 wasn't the -- my statement states that I am aware
17 that it was used since a particular time.

18 Q. Okay.

19 A. Not that I was aware it was being used
20 during that time or any time in between.

21 Q. Okay.

22 A. So I guess I'm not sure what you're
23 asking me, other than what the statement says.

24 Q. Okay. I'm sorry. So, I guess what I'm
25 trying to get a sense of is, in your role as

1 executive director -- during the time that you have
2 been the executive director, do you have any
3 knowledge that you can tell us about regarding the
4 use of Stroll to the Polls by the sorority itself and
5 while you've been in the role that you have been in?

6 A. Not on a national level.

7 Q. Okay. How about on a local level?

8 A. Not in my local chapter, that I'm
9 knowledgeable, so I can't speak to the others.

10 Q. Okay. I appreciate that.

11 Do you know of any part of the sorority,
12 be it national or local, that has ever sold
13 merchandise that had the terminology, Stroll to the
14 Polls, on the merchandise?

15 A. I don't know. Personally, I don't know.

16 Q. Okay. Do you know of any other
17 organizations that may have sold merchandise, be it
18 clothing or otherwise, that had the terminology,
19 Stroll to the Polls, on the merchandise?

20 A. I personally don't know.

21 Q. Okay. Do you know of any other
22 organizations that -- I think you said a couple. I
23 think the Pan-Hellenic and the churches in connection
24 with the campaigns and activities that you were
25 involved with in Tallahassee, do you know of any

1 other organizations that have used the terminology,
2 Stroll to the Polls, in addition to the ones that you
3 were personally involved with in Tallahassee?

4 A. No.

5 Q. Okay.

6 MR. STANBACK: Sandra, I think I'm done.
7 I imagine that counsel for AKA may have her own
8 questions. See, Jessica, this is how I remember.

9 MS. EKHOFF: Yes, I do have a few
10 questions.

11 EXAMINATION

12 BY MS. EKHOFF:

13 Q. Ms. Washington, I want to go back,
14 briefly, to your time in Tallahassee. You lived in
15 Tallahassee from 2007 to 2016. Is that right?

16 A. Yes.

17 Q. And somewhere between 2007 and 2016 the
18 Tallahassee chapter of Delta was using the phrase,
19 Stroll to the Polls, in connection with get-out-
20 to-vote activities. Is that right?

21 A. Yes.

22 Q. And were there local churches involved
23 with Delta's stroll to the polls activities in
24 Tallahassee between 2007 and 2016?

25 A. Yes.

1 Q. Was the National Pan-Hellenic Council
2 involved with Delta's stroll to the polls activities
3 in Tallahassee between 2007 and 2016?

4 A. Yes.

5 Q. Switching topics, you mentioned that
6 Delta has authorized vendors that sell merchandise
7 that bears Delta's trademark.

8 Is that right?

9 A. Yes.

10 Q. Are you aware of any of Delta's vendors
11 currently selling apparel with the phrase, Stroll to
12 the Polls, on it?

13 A. Yes.

14 Q. Okay. Can you tell me a bit about that
15 use?

16 A. So, we have licensed vendors
17 licensed -- licensees, partners in our use of our IP.
18 We recently had a regional conference and in the
19 exhibit hall there were vendors who had get-out-to-
20 vote-type rallying merchandise, and on that
21 merchandise there was at least one, maybe more, that
22 had that merchandise being sold.

23 Q. And approximately when was that
24 convention, did you say?

25 A. That conference ended earlier this

1 month. Not sure the date. The 15th maybe.

2 Q. Okay. So since August, Delta had a
3 conference, and at that conference, there was at
4 least one vendor, and maybe more, selling shirts with
5 the phrase, Stroll to the Polls, on it?

6 A. Yes.

7 Q. Thank you. No further questions.

8 MR. STANBACK: Jessica, can I go down
9 that road a little bit that you just opened?

10 MS. EKHOFF: You may.

11 EXAMINATION

12 MR. STANBACK:

13 Q. Ms. Washington, you said it could have
14 been one, maybe two, vendors. Do you have -- it
15 sounds like you don't, but do you have any idea who
16 those vendors were, by name?

17 A. I personally don't have those names.
18 Literally, you walk through a hall and you see and I
19 did not necessarily say, okay, oh. So no, I don't
20 have that information.

21 Q. And those vendors, did they register
22 with you in terms of their use of that terminology?

23 A. No.

24 Q. Okay. So do you have any information to
25 know that those vendors were not related to the

1 applicant?

2 A. What applicant?

3 Q. The applicant, Stroll to the Polls,
4 Inc.?

5 A. No. I don't have any information on
6 that.

7 Q. Okay. So you just know that there were
8 some vendors there and the first time that you've
9 had -- strike that.

10 You said this was the recent conference,
11 the recent convention?

12 A. The recent conference. We had seven
13 conferences over the course of the summer.

14 Q. Okay.

15 A. The latest was in -- ended in August.

16 Q. Okay. So, from your recollection, was
17 this the first time that you have seen any vendors
18 with clothing that had Stroll to the Polls on the
19 clothing or on the merchandise at one of your
20 conferences?

21 A. Well, I don't go to that -- to the
22 vending area often, so I can't say yes or no on that
23 that one.

24 Q. I'm talking about your personal
25 observation.

1 A. I can't say yes or no. They're all
2 running together, so I can't have a recollection of
3 whether I saw them earlier or not.

4 Q. Okay.

5 A. I don't know.

6 Q. Okay. Sorry. I didn't mean to cut you
7 off.

8 But you have a clear recollection with
9 respect to this year's sets of conferences but you
10 don't have --

11 A. Oh, you're talking about other years?

12 Q. Yes.

13 A. Oh, definitely I don't know that. I
14 thought you meant earlier this year.

15 Q. No.

16 A. I certainly don't have a recollection of
17 that.

18 Q. Okay. Okay. I appreciate that.

19 MR. STANBACK: Counsel, anything else
20 you want to ask?

21 MS. EKHOFF: Nothing more for me.

22 MR. STANBACK: Okay. Ms. Washington,
23 thank you again for being available. Like I said, I
24 understand what it means to be doing this on the eve
25 of Labor Day weekend, so I really appreciate your

1 time.

2 Ms. Simmons, I appreciate your time.
3 Always appreciate Jessica's time. I don't have to
4 say that.

5 MS. EKHOFF: Thank you. And we do
6 reserve read and sign.

7 THE REPORTER: Do you want a copy of
8 transcript?

9 MS. EKHOFF: Yes, please.

10 MR. STANBACK: Yes.

11 (Deposition concluded at 5:30 p.m.)
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REPORTER'S CERTIFICATE

I, SANDRA BERKELAND, CCR No. XIO1666, Certified Court Reporter, certify;

That the foregoing proceedings were taken by me REMOTELY at the time therein set forth, at which time the witness was put under oath by me;

That the testimony of the witness, the questions propounded, and all objections and statements made at the time of the examination were recorded stenographically by me and were thereafter transcribed;

That the foregoing is a true and correct transcript of my shorthand notes as taken. I further certify that I am not a relative or employee of any attorney or the parties, nor financially interested in the action.

I declare under penalty of perjury under the laws of New Jersey that the foregoing is true and correct.

Dated this 18th day of September, 2024

A handwritten signature in black ink that reads "Sandra Berkeland". The script is cursive and fluid.

SANDRA BERKELAND, CSR No. XIO1666

1 JESSICA A. EKHOFF, ESQ.

2 JAE@pattishall.com

3 September 18, 2024

4 RE: AKA v. STTP

5 8/29/2024, Dorcas E. Washington (#6889769)

6 The above-referenced transcript is available for
7 review.

8 Within the applicable timeframe, the witness should
9 read the testimony to verify its accuracy. If there are
10 any changes, the witness should note those with the
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of
13 Deponent and Errata and return to the deposing attorney.
14 Copies should be sent to all counsel, and to Veritext at
15 cs-ny@veritext.com

16 Return completed errata within 30 days from
17 receipt of testimony.

18 If the witness fails to do so within the time
19 allotted, the transcript may be used as if signed.

20
21
22 Yours,

23 Veritext Legal Solutions
24
25

AKA v. STTP

Dorcas E. Washington (#6889769)

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Dorcas E. Washington

Date

1 AKA v. STTP

2 Dorcas E. Washington (#6889769)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Dorcas E. Washington, do hereby declare that I
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.

10
11 _____
12 Dorcas E. Washington

_____ Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

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&	2005 22:1	28 3:14	9
& 2:5 3:15	2007 22:1,5 23:15 27:2	2900 2:7	90 32:7
0	47:2 51:15,17	29th 1:17	916267937 1:5
002 14:20	51:24 52:3	3	9225 57:23
08608 2:13	2011 23:16	3 3:13 18:10,11 18:14 27:17	a
1	2012 22:4 43:5 44:2 45:5,21	30 58:16	ability 11:9 30:3,4
1 3:11 9:23,24 10:2 14:7	2013 23:1	31 3:15	able 5:5 6:11 15:9
10 3:11	2014 24:10	312 2:8	above 1:15 20:4,5 58:6 60:7
103 2:12	2016 22:5,7,11 23:1,17 24:12	33 36:19,20	ac 25:17
12 22:25 34:20 45:23	27:3,4 47:2	36 2:12	accord 12:25
13 22:4,25 46:22	51:15,17,24 52:3	4	accuracy 58:9
15 3:12	2018 20:16	4 3:14 28:4,5,8 42:16	accurate 40:19 45:6,8
15th 53:1	2020 14:16,16 19:8 22:14	4,53 3:6	accurately 46:4
16 23:17	23:1 24:6	4:04 1:17	acknowledge 4:2,5
18 3:13 58:3	2021 22:15	5	acknowledge... 60:3
18th 57:21	2022 11:24 12:11 22:15	5 3:15 31:6,8 31:10	acknowledging 40:4
1984 21:8	29:13 30:13,18	51 3:7	acknowledg... 58:12
1985 17:24	33:6 37:18	53 37:3	acting 22:15
1988 21:8	45:23,23	554-7938 2:8	action 23:6 46:23 57:17
1992 21:17	2023 31:7 32:18,21,22	5:30 56:11	actives 23:7
2	2024 1:17 57:21 58:3	6	activities 22:21 23:8,12 24:20 30:1 43:18,21 44:18 47:13 48:17 49:11
2 3:12 15:16,19 27:11	20th 45:23	60606 2:7	
20 14:16 19:8 22:25 60:15	21 44:2 45:5,21	6889769 58:5 59:2 60:2	
200 2:6	24 17:24	8	
2000 23:16 46:20	25 19:18 33:23	8/29/2024 58:5	
2002 21:22	2649 1:16	85 21:10,12,12 21:12	
2003 23:15 24:6		856-614-1111 2:13	

50:24 51:20,23 52:2 activity 5:3 43:2,23 44:1 46:13 actual 7:4 actually 4:24 10:6 24:5 43:7 49:15 add 31:1 addition 51:2 additional 14:8 additions 60:6 address 9:9 16:22,23,25 adjacent 19:25 administer 4:6 administered 4:6 advertising 43:20 advised 24:9 advisor 24:9,10 advisory 24:11 affiliate 39:3 affiliated 26:21 afternoon 4:22 4:23,25 5:1 agree 7:18 agreed 4:13,14 4:16 agreement 4:10 4:11 ahead 6:3	aka 13:10 16:15 42:1 51:7 58:4 59:1 60:1 alabama 21:7 allotted 58:19 allows 41:3 alonzo 2:10,11 4:13 alpha 1:4,4 10:13,13 11:1 11:1,21,22,25 11:25 12:2,2 16:11,11 26:1 26:1,4,5,10,10 41:15,15 alumnae 22:24 27:6 amended 3:12 15:18 amount 32:15 answer 6:3 7:8 7:14 25:24 34:14 answered 12:24 answers 6:8 34:13 anybody 6:12 25:12 27:21 38:12 anymore 24:7 anyone's 38:8 anyway 25:25	apologize 31:17 apparel 52:11 appeal 1:2 10:18,23 appeals 14:1 appearances 2:1 appeared 2:2 appears 43:13 appended 60:7 applicable 38:25 58:8 applicant 1:9 2:9 12:22 13:1 54:1,2,3 application 14:3 18:13 19:6,12,17 38:20 40:16 applications 19:14 38:9 applied 13:5 applying 13:3 appreciate 5:7 42:14 50:10 55:18,25 56:2 56:3 appreciates 5:8 appropriate 5:15 22:18 approval 36:2 36:5 38:17,21 41:8 approvals 37:25	approve 40:17 approximately 27:1 52:23 april 22:25 23:1 aprons 20:1 area 24:17 26:25 34:18 36:23 39:12 54:22 arrangement 4:8 article 34:8 ascertain 6:16 asked 47:25 asking 6:5,10 7:7 18:20 35:19 49:23 associated 17:15 18:4 41:9 assuming 23:25 attached 3:17 58:11 attending 27:7 attest 45:25 attorney 7:11 41:20 57:16 58:13 attorneys 2:2 4:1 25:11 auburn 18:1 21:6,7 august 1:17 29:13 30:13,18
---	---	---	---

33:6 45:23,23 53:2 54:15 authorized 52:6 availability 5:8 available 5:3 19:9 38:19 55:23 58:6 aware 39:17 41:14 49:16,19 52:10	27:21 36:7 37:1,3 46:2 berkeland 1:15 1:19 57:3,24 best 5:20 6:10 7:4 11:6 better 27:22 beyond 44:18 bibs 20:1 big 37:2 bigger 10:7 bird 43:14 bit 18:16,22 41:13 44:10 49:7 52:14 53:9 board 1:2 10:18,23 14:1 34:4 35:4 body 33:17,19 33:20 bodysuits 20:2 bottom 19:20 37:3 box 17:8,11,14 18:4 break 7:5,6,7,9 48:24 brevard 21:24 21:24 briefly 51:14 brought 36:8 39:23 40:2 business 29:25	button 44:11 44:16 45:4,10 45:12,19 bylaws 3:15 31:7 32:18 33:23 37:21	certify 57:4,15 chair 23:6 46:23 challenges 5:4 challenging 11:11 change 30:16 31:1 33:9,10 59:4,7,10,13,16 59:19 changed 30:16 33:15 changes 58:10 60:6 chapter 17:25 22:20,22,24,24 23:4,5,14 24:10 27:6 35:3 38:25 39:2,2,7 43:7 43:16 46:9,13 46:13 50:8 51:18 chapters 26:20 characterize 48:12 cheryl 23:23 chicago 2:7 church 46:16 churches 24:21 48:15 50:23 51:22 circulate 9:17 clarify 7:1 11:17
b		c	
b 30:9 44:7 back 17:9 18:25 27:11,17 29:3 30:9 31:3 32:5,11 38:23 41:12 42:16 44:25 49:5 51:13 background 20:23 based 6:9 30:3 32:15 38:7 43:13 44:2 basically 37:10 basing 49:11 49:15 basis 35:7 bears 52:7 began 21:18 behalf 2:4,9 34:3 believe 7:11 11:24 24:18		c 1:14 call 5:5 9:22 19:15 26:20 37:10 campaign 48:13 campaigns 48:11 50:24 capacity 25:7,9 39:12 careful 21:4 caron 2:11 4:14 9:1 10:3 16:1 17:9 18:9,24 20:7 28:9 30:8 31:15,20 32:23 34:16 37:15 44:7 case 11:14 ccr 57:3 center 21:16 central 21:23 certainly 55:16 certificate 57:1 certified 1:15 1:19 24:5,9 57:3	

clarity 6:25 class 19:17 classifications 19:15 clean 6:8 clear 6:5,8 55:8 clearer 6:7 client 5:8 7:11 41:20 closely 39:22 39:22 clothing 19:17 27:19,25 48:2 50:18 54:18,19 coast 4:24 college 21:1,3 21:13,15 column 17:11 19:25 20:14 come 30:9 31:3 40:15 comes 15:3 commencing 1:17 commerce 20:18 committee 34:25 35:15 communication 36:9 41:23 communicati... 41:25 community 46:15	company 21:25 22:2,4,5 complete 30:7 60:8 completed 38:20 58:16 computer 9:8 concern 7:6,12 concert 34:24 concluded 56:11 concurrence 36:7,11,12 conducting 29:25 conference 1:12,16 48:16 52:18,25 53:3 53:3 54:10,12 conferences 54:13,20 55:9 connection 12:7 27:24 47:13 50:23 51:19 consent 4:7 considered 41:20 constitution 3:15 31:7 32:18 37:21 content 42:5 context 5:21 continued 21:22	convention 52:24 54:11 conversation 6:17 13:9,12 13:18 conversations 25:12 41:25 42:6 coordinator 23:15 copies 58:14 copy 56:7 coran 18:15 28:3 32:11 36:18 44:25 corner 12:20 14:7 correct 16:22 17:5,6 22:12 25:5,10 35:24 37:8 40:20 41:13 43:22 45:14,16 46:3 46:25 47:6 49:11 57:13,20 60:8 corrections 60:6 correctly 44:24 48:10 council 24:11 26:12,14,17,21 48:16 52:1 councils 26:21	counsel 2:1,16 4:7 5:25 6:1 7:12 8:21 13:19,20 16:15 25:20 31:19 35:22 37:15 41:16,17,21,24 41:25 42:3,7,8 48:25 51:7 55:19 58:14 count 8:2 county 21:24 21:24,25 couple 7:20,25 21:15 32:5 50:22 course 6:9,20 45:11 54:13 court 1:15,19 6:20 8:13 57:4 created 44:13 44:15,19,20 45:12 creating 36:15 creation 44:10 crossed 21:10 cs 58:15 csr 57:24 curate 39:5 currently 22:10 26:12 27:5 52:11 cut 55:6
---	---	---	--

d	49:9 51:18 52:6 53:2 delta's 51:23 52:2,7,10 depicted 9:13 deponent 58:13 60:3 deposing 58:13 deposition 1:12 3:11 4:2,3,4 5:5,19,20,23 7:22,22 10:1 10:12,16 15:8 56:11 deputy 22:8,11 description 3:10 details 36:19 development 21:18,23 24:3 different 15:25 24:21,21 26:8 46:10,17 direction 34:25 director 22:9 22:10,13 23:24 25:8 33:5 35:2 36:1 42:22 49:13 50:1,2 directors 26:13 35:4 disclosure 3:12 25:2 disclosures 15:18	discussed 41:12 discussing 11:19 discussion 36:12 disrespect 7:2 distributed 44:20 div 23:20 divulge 42:5 divulging 42:12 document 9:19 9:23 10:9 11:1 12:20 14:19,20 14:22 15:14 16:7,8,14 18:8 18:10,22 19:2 19:5,8 20:21 25:2,3 28:4 29:8,11,12 30:13 31:6,13 31:20 32:12 44:3,4 documents 14:23 25:20,21 doing 9:21 10:15 24:7 32:8 40:4 55:24 dorcass 1:13 3:3 4:16,17 58:5 59:2,24 60:2,4 60:12 double 32:5	dr 24:14 drafted 25:20 29:15,19 dresses 20:2 drill 16:7 18:22 29:3 drive 2:6 dst 3:15 5:14 duly 4:18 duties 33:14 34:6
d 2:11 3:1 d.c. 1:17 date 14:11,14 19:7 20:11,14 20:17 27:1,1 32:20 45:11,14 53:1 59:24 60:12 dated 57:21 dates 23:18 46:20,24 day 1:17 6:8 33:8 35:7,7 37:23,23 55:25 57:21 60:15 daycare 21:16 days 58:16 deal 30:21 decision 35:17 declaration 3:14 11:23 28:7 36:4,15 41:23 45:1 declare 57:18 60:4 deemed 60:6 definitely 55:13 degree 21:9 delta 5:14,16 17:19,21 18:6 22:6,9 23:11 24:3 25:3 27:23 39:3 40:15 46:14		e e 1:19 3:1 58:5 59:2,3,3,3,24 60:2,4,12 earlier 16:16 52:25 55:3,14 early 20:15 43:14,15 easier 6:20 15:5 edition 31:7 32:19 either 22:25 42:6 ekhoff 2:6 3:7 4:15,15 8:24 9:3,15 15:1 31:23,25 32:6 34:10 42:4 49:2 51:9,12 53:10 55:21 56:5,9 58:1 elaborate 11:6 46:7	

<p>elaine 1:13 3:3 4:17</p> <p>elected 33:16 33:18,19,20</p> <p>elections 47:9</p> <p>electronic 29:6</p> <p>else's 39:15,16 40:1</p> <p>email 9:9,9</p> <p>emails 15:8</p> <p>employed 26:1</p> <p>employee 57:15</p> <p>encourage 39:9</p> <p>encouraging 43:15</p> <p>ended 52:25 54:15</p> <p>engaged 46:13 46:14</p> <p>ensure 35:2</p> <p>enter 15:15 18:11 28:5</p> <p>entire 34:11</p> <p>entirety 31:21</p> <p>entitled 1:15</p> <p>errata 58:11,13 58:16</p> <p>especially 5:22</p> <p>esq 2:6,11,11 2:16 58:1</p> <p>established 35:3</p> <p>eve 55:24</p> <p>everybody 41:9</p>	<p>evidence 46:11</p> <p>exactly 42:10 45:19 46:22</p> <p>examination 3:4 4:20 51:11 53:11 57:10</p> <p>example 20:25</p> <p>excluding 25:11,19</p> <p>executed 35:4</p> <p>execution 43:25</p> <p>executive 22:8 22:10,13 25:8 26:13 33:4 34:24 35:2,15 36:1 42:22 49:13 50:1,2</p> <p>exhibit 3:11,12 3:13,14,15 9:24 10:1 14:7 15:16,19 18:11 18:14 27:11,17 28:5,8 30:9 31:8,10 42:16 42:21,24 43:3 43:3 44:7 45:14 52:19</p> <p>exhibits 3:9,17 8:22 42:18</p> <p>expecting 16:4</p> <p>explanation 43:1</p> <p>extent 40:21</p>	<p>extra 39:11</p> <p>eyeball 29:2</p> <p>f</p> <p>fact 10:15</p> <p>fadia 2:17 9:16</p> <p>fails 58:18</p> <p>fall 21:8,12</p> <p>familiar 8:8 24:15 28:21,24 29:7,11 32:13</p> <p>fast 26:24</p> <p>fee 38:21,24</p> <p>feel 6:3,6 7:5 15:4</p> <p>fees 40:18</p> <p>filed 14:3,12 16:15 19:7,14</p> <p>fill 40:16</p> <p>final 40:3</p> <p>financially 57:16</p> <p>find 30:4 46:11</p> <p>fine 5:16 12:15 14:10 15:9 31:23 49:2</p> <p>firms 13:15</p> <p>first 4:12 9:19 10:9 19:8,20 20:10,14,17 21:15 22:9 29:7,10,24 32:3 36:10 41:14 54:8,17</p> <p>firsthand 43:24</p>	<p>five 8:4,6,23 42:18 48:24</p> <p>florida 21:24 22:1 23:16 24:10,13,17 46:14</p> <p>fly 27:9</p> <p>flyer 43:4,9</p> <p>focus 16:18 19:12,15</p> <p>focused 19:17</p> <p>folks 24:21</p> <p>follow 7:18</p> <p>follows 4:19</p> <p>font 9:12,20</p> <p>footwear 20:2</p> <p>foregoing 57:5 57:13,19 60:5</p> <p>forth 57:6</p> <p>frame 12:11,13 21:3 45:5,11 45:20 46:19 47:15 48:4</p> <p>framework 37:13,18</p> <p>free 6:3,6 7:5 15:4</p> <p>front 10:23 14:1 24:7</p> <p>froze 40:10</p> <p>further 4:5 53:7 57:14</p>
---	--	---	--

g	24:20,20 25:25 27:11 30:24 31:3,13,19,21 31:25 32:1 40:18 41:12 42:18 43:4 44:10,17 47:20 48:12	headquarters 22:18 35:1 hearing 45:18 held 1:16 hellenic 26:14 48:16 50:23 52:1 hello 40:9 helpful 9:6 hereto 60:7 hi 47:18 highlight 29:22 highlighted 33:2,24 34:18 36:23 37:1 hilliard 2:5 history 38:9 44:4 hold 9:3 holiday 5:7 hour 1:17 house 2:16 41:16,24 42:7 housekeeping 7:21 hr 24:1 huh 12:23 27:20 28:17 30:14 44:12 47:3 human 21:9	identification 19:22 27:18 il 2:7 imagine 51:7 immediate 33:4 35:1,6 36:3 impact 8:17 including 23:7 incorporated 17:19,21 18:6 26:2,5 independent 48:21 indicate 4:10 individual 25:9 29:18,21,23 information 12:5 14:8 27:14 29:2 30:6 38:22 42:23 53:20,24 54:5 initial 13:12,18 13:18 initiated 17:24 initiatives 43:12 input 29:18,21 29:23 insignia 38:1 38:18 39:1 instances 46:7 47:8 instruct 42:4
galinda 2:17 general 13:19 13:20 17:13 35:22 generally 44:16 georgia 43:16 geraldson 2:5 gestures 6:18 getting 10:20 41:19 43:14 give 5:17 6:19 21:2,19 42:23 46:24 48:13 given 7:21 60:9 gleaning 45:6 go 4:12 6:3 9:22 14:19,20 15:10 17:9 18:3,25 21:14 23:13 27:9 28:12 29:3 30:3 31:21 33:23 36:18,22 39:10 42:15,21 43:12 44:7,25 51:13 53:8 54:21 going 5:10,17 6:9,18 7:1 8:16 8:20 9:13,19 9:22 10:8 14:18,19 15:7 15:23 16:7 18:2 20:20	good 4:22,23 28:16 36:25 goods 27:18 48:6,7 gotcha 27:10 grad 21:14 graduate 21:6 graduated 21:8 grand 35:3 great 5:4 17:17 34:23 grounds 34:11 group 22:3 guess 12:17 44:10 49:22,24	h h 59:3 hall 52:19 53:18 hand 6:18 12:20 happened 39:19 happening 48:6 harris 1:16 hats 20:2	i idea 21:2 48:13 53:15

instructions 5:18 7:16 intake 24:8 interact 34:3 interaction 11:21 24:14 interested 57:16 internal 24:3 international 33:3,11 introduced 35:23 36:1 involved 10:20 10:21 22:20 26:11 35:9,9 35:17 36:3,14 48:11 50:25 51:3,22 52:2 involvement 35:13 48:22 ip 11:12 41:4 52:17	johnson 2:11 4:14,14 9:5 10:5 14:18 15:20,22 16:3 18:17 20:9 28:11,14 30:10 31:5,16,24 32:9 33:22,25 34:19 36:21,24 37:4,6,17 42:15 44:8 45:2 july 44:2 45:5 45:21 june 14:16,16 19:8	21:3 23:11 24:16 25:24 28:1 30:22,25 34:13 38:10,13 39:17 40:17 42:17 44:15 47:10,24 48:8 50:11,15,15,16 50:20,21,25 53:25 54:7 55:5,13 knowing 5:6,24 knowledge 11:7,8 13:7 24:1 25:3 27:23 36:13 43:24,25 47:11 50:3 knowledgeable 27:13 50:9	license 11:10 38:19,23 39:4 39:14,25 40:7 40:15 41:3 licensed 39:6,9 39:16 40:22 52:16,17 licensees 52:17 licensing 40:6 40:24 lieu 4:5 likewise 44:9 limited 32:15 line 34:11 59:4 59:7,10,13,16 59:19 list 27:19 listed 11:2 12:21 37:20 literally 53:18 little 10:6 15:23 16:8 18:3,16 18:22 37:15 41:13 42:25 44:9 49:7 53:9 lived 51:14 llp 2:5 local 26:21 48:15 50:7,8 50:12 51:22 longer 42:19 look 9:12 10:17 19:20 20:4 23:22 32:13 39:22
j	k	labor 55:25 lafayette 2:12 language 27:11 33:2 latest 54:15 law 13:15 laws 57:19 leadership 34:4 left 12:20 21:22 24:11 27:2 legal 58:23 level 26:16,18 35:15 36:14 50:6,7	
jackets 20:2 jae 2:8 58:2 jersey 22:6 57:19 jessica 2:6 4:15 8:22 14:21 42:3,13 51:8 53:8 58:1 jessica's 56:3 job 22:9	kaiser 22:3 kappa 1:4 10:13 11:1,22 11:25 12:2 16:11 18:1 26:1,5,10 41:15 keep 9:18 31:25 kicking 25:17 kind 6:17 26:24 31:18 37:10 41:8 kindly 19:24 know 5:3,20 6:16 8:21 9:7 9:10 12:9,12 12:14 13:3,4 18:18 20:25		

looking 10:25 12:19 25:1 43:13 looks 17:3 32:16 45:3 lose 47:16 losing 47:24 lot 24:19 36:19 loud 28:22,23 34:22	marked 10:1 15:18 18:14 28:7 31:8 marks 38:17 39:15 40:1,15 40:25 massive 9:20 match 10:15 matter 1:15 10:20 11:2,4 11:18 12:7 13:1,25 16:11 16:17 19:12,16 24:17 25:1,13 35:10,23,25 36:3 41:14 matters 10:22 max 15:25 mcauliffe 2:5 mean 7:2 55:6 means 11:3 55:24 meant 55:14 medications 8:16,19 meetings 27:7,9 meka 2:16 9:15 member 17:20 24:8 26:4 27:5 mentioned 52:5 merchandise 39:13 47:14 48:2,3 50:13 50:14,17,19 52:6,20,21,22	54:19 merchandising 37:23 middle 7:9 15:8 mind 30:16 minimal 5:18 minutes 48:24 month 53:1 mouth 45:18 move 14:19 28:3 31:15 36:20 46:15 moved 21:17 21:23,24 22:1 22:6,23 27:2 moving 31:14 multiple 47:8	necessary 60:6 need 7:6 9:9 18:18 24:6 30:21 31:1 36:2 39:4,8 41:22 42:25 needs 6:25 39:6 neither 13:16 never 26:4 42:2 new 22:6 57:19 newbury 2:5 nj 2:13 nod 6:18 normal 6:17 35:8 normally 15:7 notary 1:16 60:13,19 note 58:10 noted 34:15 60:7 notes 1:14 47:1 57:14 notice 3:11 10:1,12 notion 35:5 november 17:24 21:12 nphc 26:12 number 3:10 16:13 ny 58:15
m			
made 43:4,4 57:10 60:5 madison 21:25 main 19:12 major 21:4 43:11 make 5:11,18 6:2,7 7:3 8:7 10:7 14:23 16:6 28:20,24 29:1 34:2 44:23 49:8 makes 6:20 making 5:2 manage 37:24 management 21:9 manner 4:9 marching 37:11 mark 9:23 10:22 11:22,25 18:13 19:6 31:9 39:6	marked 10:1 15:18 18:14 28:7 31:8 marks 38:17 39:15 40:1,15 40:25 massive 9:20 match 10:15 matter 1:15 10:20 11:2,4 11:18 12:7 13:1,25 16:11 16:17 19:12,16 24:17 25:1,13 35:10,23,25 36:3 41:14 matters 10:22 max 15:25 mcauliffe 2:5 mean 7:2 55:6 means 11:3 55:24 meant 55:14 medications 8:16,19 meetings 27:7,9 meka 2:16 9:15 member 17:20 24:8 26:4 27:5 mentioned 52:5 merchandise 39:13 47:14 48:2,3 50:13 50:14,17,19 52:6,20,21,22	54:19 merchandising 37:23 middle 7:9 15:8 mind 30:16 minimal 5:18 minutes 48:24 month 53:1 mouth 45:18 move 14:19 28:3 31:15 36:20 46:15 moved 21:17 21:23,24 22:1 22:6,23 27:2 moving 31:14 multiple 47:8	necessary 60:6 need 7:6 9:9 18:18 24:6 30:21 31:1 36:2 39:4,8 41:22 42:25 needs 6:25 39:6 neither 13:16 never 26:4 42:2 new 22:6 57:19 newbury 2:5 nj 2:13 nod 6:18 normal 6:17 35:8 normally 15:7 notary 1:16 60:13,19 note 58:10 noted 34:15 60:7 notes 1:14 47:1 57:14 notice 3:11 10:1,12 notion 35:5 november 17:24 21:12 nphc 26:12 number 3:10 16:13 ny 58:15
		n	
		n 1:14 3:1 26:15 name 4:11 17:15 18:5 24:15 29:24 33:9,10 53:16 names 53:17 national 26:14 26:15,16,22 33:12 34:6 35:1,4 37:12 48:15 50:6,12 52:1 ne 1:16 necessarily 28:21 39:4 53:19	necessary 60:6 need 7:6 9:9 18:18 24:6 30:21 31:1 36:2 39:4,8 41:22 42:25 needs 6:25 39:6 neither 13:16 never 26:4 42:2 new 22:6 57:19 newbury 2:5 nj 2:13 nod 6:18 normal 6:17 35:8 normally 15:7 notary 1:16 60:13,19 note 58:10 noted 34:15 60:7 notes 1:14 47:1 57:14 notice 3:11 10:1,12 notion 35:5 november 17:24 21:12 nphc 26:12 number 3:10 16:13 ny 58:15

<p>o</p> <p>oath 4:5,6 8:12 57:7</p> <p>object 34:10 41:22</p> <p>objection 6:1,2 34:15</p> <p>objections 4:8 57:9</p> <p>objective 6:15</p> <p>observation 54:25</p> <p>occasion 10:21 39:14</p> <p>occurred 49:12</p> <p>october 22:7,11 23:1</p> <p>office 1:1 3:13 16:24 17:1 19:10 37:12,24</p> <p>officers 34:7</p> <p>offline 7:13</p> <p>oh 9:3 25:18 37:2 42:3 53:19 55:11,13</p> <p>okay 5:2,17 6:15,23 7:14 7:15,20 8:1,7 8:10,15,20,25 9:6,15 10:11 11:13,16 12:6 12:10,14,18 13:6,12,17,20 13:20 14:6,14 15:2,12 16:9</p>	<p>17:3,14,20,25 18:2 19:4,19 20:4,13,20 21:10,13 22:13 22:17 23:3,10 23:14 24:13,16 24:23 25:11,18 27:4,17 28:2 28:19 29:5,10 29:14,17,22 30:7,15,20,24 31:3,19 32:6 32:15 33:1,6,8 33:18,21 34:1 34:6,15 35:5 35:21 36:6,9 36:17,25 37:7 37:14,22 38:3 38:11,15,24 39:24 40:5 41:6,11,19 42:9,14,20 43:6,8,22 44:6 44:21 45:24 46:2,25 47:4,7 47:11 48:19,25 49:3,18,21,24 50:7,10,16,21 51:5 52:14 53:2,19,24 54:7,14,16 55:4,6,18,18,22</p> <p>once 18:20</p> <p>ones 28:25 51:2</p>	<p>online 27:8</p> <p>open 8:13</p> <p>opened 53:9</p> <p>operations 37:23</p> <p>opportunity 6:2 14:22</p> <p>opposed 25:9 38:8,12</p> <p>opposer 1:6 2:4 11:2,3</p> <p>opposing 11:9</p> <p>opposition 1:5 16:13 35:13</p> <p>orders 37:11</p> <p>organization 5:12 12:3 13:2 13:14 19:7 25:8 26:22 27:13,22 33:17 34:3 38:4 39:25 44:5</p> <p>organization's 27:15 35:12 38:1</p> <p>organizational 34:25</p> <p>organizations 26:9,20 48:14 48:20 50:17,22 51:1</p> <p>organized 48:17</p> <p>original 19:5</p>	<p>origins 42:23 42:25</p> <p>outfit 44:17</p> <p>outside 13:15 41:25 42:2,7</p> <p>own 9:11,12 39:7 51:7</p> <p>p</p> <p>p 1:14</p> <p>p.m. 1:17 56:11</p> <p>page 3:4,10 5:19 16:2,19 19:21 20:8 28:13 31:21,22 32:11,24 33:1 33:23,24 34:16 34:17 36:19 37:3 45:1 59:4 59:7,10,13,16 59:19</p> <p>pages 15:25 18:16,25 32:5 32:7</p> <p>pan 26:14 48:16 50:23 52:1</p> <p>pants 20:3</p> <p>paper 20:1</p> <p>paragraph 34:20 45:4</p> <p>parallel 40:6</p> <p>paraphrasing 41:13 46:4</p> <p>part 6:10 13:14 19:13 24:17</p>
---	--	---	--

32:2,3,4 34:7 39:24 43:17 44:17 50:11 participating 4:2 particular 5:23 11:22 16:16 19:16,16 25:1 43:23 44:1,2 45:14 46:24 49:17 parties 4:7 57:16 partnered 46:9 partners 41:3 52:17 past 18:24 patent 1:1 11:10 patricia 1:16 pattishall 2:5 pattishall.com 2:8 58:2 pause 29:1 pay 40:18 pc 2:10 pc.com 2:14 penalty 57:18 pending 25:13 people 5:21 14:23 15:7 24:7 35:8 43:12,15,15 46:10,16 48:10 48:18	perfectly 12:15 period 43:10 perjury 57:18 permanent 22:16 person 4:6 23:18 25:9 33:13,16 35:22 personal 30:1 46:11 54:24 personally 50:15,20 51:3 53:17 philpot 24:14 phrase 17:18 18:5 47:7,12 47:15 51:18 52:11 53:5 physically 4:3 place 1:16 40:24 places 46:17 planning 43:24 please 4:10 6:5 7:7 56:9 pledge 17:23 point 5:15 7:7 11:13 43:7 policies 35:3 poll 12:21 13:4 13:8 polling 46:17 polls 1:8 11:23 12:1 14:2,4 16:12 17:18	18:6 19:6 23:8 24:20 25:5 27:15,24 30:2 41:15 44:18 46:6,12,15 48:5,21 49:10 50:4,14,19 51:2,19,23 52:2,12 53:5 54:3,18 position 22:23 42:22 43:6 possible 6:9 24:19,22 possibly 8:17 practice 35:8 pragmatic 43:21 preference 5:13 preparation 25:22 present 2:15 4:3 presented 43:3 45:10,10 presently 13:25 president 22:22 22:24 23:4,5 33:3,11,12 46:21,22 presidential 34:4 pretrial 3:12 15:18	pretty 28:16 primarily 49:12 primary 24:10 printed 19:5 prior 11:23 13:8 23:4 46:23 privilege 7:11 41:20 probably 24:6 problem 38:15 problematic 6:17 proceedings 1:15 57:5 process 8:8 38:16,21 39:25 40:5,7,13,23 41:7 products 38:22 38:25 program 30:5 programming 43:18 programs 23:6 properly 6:21 propounded 57:9 provide 27:14 34:25 provided 10:12 25:2 29:18,21 29:23 44:11
--	--	---	---

providing 10:14 11:23 13:24 public 1:16 60:19 publically 19:9 pull 14:24 18:7 18:9 31:5 pulling 24:1 purchase 39:4 purview 35:16 put 45:17 57:7	reached 41:16 read 15:5 16:5 17:12,16 18:20 19:24 20:13 28:18,20,22,23 31:13 33:2 34:20,22 56:6 58:9 60:5 really 5:7 6:15 55:25 reason 58:11 59:6,9,12,15,18 59:21 recall 13:13 receipt 58:17 receive 25:19 received 8:22 25:21 receiving 9:8 recent 54:10,11 54:12 recently 52:18 recess 49:4 recollection 13:21 29:17 30:1 38:11,14 46:8,12 47:12 48:2,4,19 54:16 55:2,8 55:16 record 3:13 4:11 6:21,21 7:4 49:6 recorded 57:11	records 9:24 30:2 refer 5:13 reference 10:18 11:13 16:6,19 referenced 58:6 referring 27:17 regarding 11:22 13:25 18:3 25:12 27:12,14,23 50:3 region 23:19 regional 23:17 23:18,20,24 34:7 52:18 register 53:21 registered 38:5 regular 29:25 43:18 related 16:11 53:25 relative 57:15 relevance 34:12 remember 12:12,15,16 13:22 23:18 48:9 51:8 remind 26:23 remotely 2:2 4:4,7 57:6 rep 13:18 rephrase 35:18 35:20	reporter 1:15 1:19 4:1 6:21 9:25 13:23 15:17 18:12 28:6 31:11 56:7 57:4 reporter's 57:1 reporting 4:4,9 represent 10:11 16:14 19:4,11 representative 13:10,13 representatives 26:10 represented 5:25 representing 4:16 request 12:4,6 required 60:13 reserve 56:6 residence 17:2 resigned 22:22 resources 21:9 respect 5:12,19 10:13 12:8 13:1 14:2 25:4 29:1 30:16,24 34:4 35:5,6,10 35:12 37:23 40:24 41:23 43:23 44:1,21 45:13,19 49:8 49:9 55:9
q			
question 5:10 5:24 6:3,4 7:8 7:10,14 25:25 31:22 35:18,20 40:12,21 47:24 48:1 questioning 34:11 questions 6:10 6:19 7:21 8:18 18:3 51:8,10 53:7 57:9 quit 47:21 quitter 47:21 47:23			
r			
r 1:14,14 59:3,3 raise 7:12,13 rallying 52:20 rather 12:16			

respond 6:11 7:1 8:18 responses 6:19 6:22 responsibilities 33:14 34:5 resumé 23:22 return 58:13,16 review 58:7 reviewed 25:21 reviews 38:22 right 6:25 10:25 12:19 13:6 14:7,17 14:17 15:11,12 15:13 17:1,8 17:20 19:24 20:20 29:6 30:11 32:23 33:21 36:17,22 40:15 44:6 45:13 47:22 51:15,20 52:8 road 53:9 roberts 1:16 role 22:8,14,16 23:21 24:2 33:14 38:8 49:12,25 50:5 roles 34:5 room 4:3 6:12 running 55:2	s s 1:14 59:3 sale 48:6 sandra 1:15,19 7:1 9:23 15:15 28:5 31:9 49:5 51:6 57:3,24 saw 19:8 55:3 saying 5:11 15:6 19:13 says 14:16 19:21 20:10,13 20:15 49:23 scanned 28:25 scheduling 5:4 school 21:14 screen 9:12,13 9:21 15:4,6,11 15:13 20:5 scroll 10:3 15:21,24 18:15 18:16 20:7 28:9 30:8 31:20 32:1,11 34:16,17 37:14 scrolling 10:5 15:22 16:5 18:17 20:9 28:11,14 30:10 31:16,24 32:9 32:16 33:25 34:19 36:21,24 37:4,6,17 44:8 45:2	second 16:19 17:10 20:14,21 23:5 40:10 secondly 29:25 section 37:2,9 see 9:3,22 10:17 11:1 12:20,21 14:10 14:11,15 15:9 15:10,24,25 16:10,12,19 17:3,14 18:19 19:21 20:6,10 28:15 34:7 37:15 43:19 51:8 53:18 seen 10:9 19:1 30:6 54:17 sell 52:6 selling 52:11 53:4 send 9:16 14:22 40:16 sense 16:6 18:21 49:25 sent 9:4,5 15:1 38:22 58:14 separate 15:5 32:4 separately 12:7 september 57:21 58:3 serve 35:1 served 22:8,9 23:5,6,15,17,18	23:20,23 24:8 26:9,16 service 10:22 18:13 39:15 40:1,25 serving 22:10 22:23 23:4 set 14:22 33:14 57:6 sets 55:9 setting 5:22 seven 54:12 share 9:1,7,10 shared 15:11 she'll 6:1 sheet 58:11 shirts 20:3 53:4 shorthand 23:10 57:14 side 16:13 sigma 17:19,21 18:6 22:7 25:4 27:23 39:3 46:14 49:9 sign 29:20 37:24 56:6 58:12 signature 29:7 57:23 signed 29:12 30:13,17 35:14 58:19 signer 40:3 signing 36:15
---	---	---	--

similar 33:13 33:14 37:20 40:23 41:8 simmons 2:16 9:11 56:2 sir 20:12 sitting 8:12 situation 7:10 six 32:11,25 33:1 sizing 31:18 skip 37:5 47:19 skirts 20:3 slow 18:19 small 9:12,19 smaller 10:7 20:6 social 23:6,7 46:23 socks 20:3 sold 22:3 47:14 48:3 50:12,17 52:22 solutions 58:23 somebody 33:18 35:15 39:15 40:1,14 40:14,24 somewhat 27:10 40:6,19 sorority 1:4 5:14 10:13 11:1 16:12,15 17:19,21 26:1 26:5 38:17	39:14 40:22 41:1 46:6 47:8 50:4,11 sorry 13:8,21 23:2 25:16 26:23 28:20 29:7 42:3 48:16 49:24 55:6 sounded 40:13 sounds 17:1 45:18 53:15 south 2:6 spaces 41:4 speak 39:21 50:9 speaking 25:7 34:2 specific 45:11 specifically 13:4 14:2 15:6 40:2 46:11 spoken 42:2,13 sponsors 41:2 spring 21:8 staff 23:19 stanback 2:10 2:11,14 3:6 4:12,13,21 8:21 9:1,6,18 10:3,6 14:18 15:2,15,20 16:1 17:9 18:9 18:15,24 20:7 28:3,9,12 30:8	30:11 31:5,9 31:15,17 32:3 32:7,10 33:22 34:15 36:18,22 36:25 37:5,7 42:15 44:6,25 47:16 48:25 49:3,5 51:6 53:8,12 55:19 55:22 56:10 start 8:20 21:1 31:14 started 22:3,11 22:14 starting 43:14 state 23:15,16 24:10,14 26:18 statement 49:16,23 statements 30:17 57:10 states 1:1 49:16 stating 4:11 stayed 24:11 stenographic 1:14 stenographic... 57:11 step 20:20,21 stop 32:10 stopped 32:23 story 21:20 strange 9:21 31:18	street 2:12 strike 13:22 44:22 54:9 stroll 1:8 11:22 12:1,21 13:4,8 13:8 14:2,3 16:12 17:18 18:5 19:6 23:8 25:4 27:15,24 30:1 41:15 44:17 46:6,12 46:15 48:5,21 49:10 50:4,13 50:19 51:2,19 51:23 52:2,11 53:5 54:3,18 structure 38:24 sttp 9:23 13:8 14:20 15:13 18:10 19:7 58:4 59:1 60:1 subject 18:4 27:14 subjects 17:13 submitted 30:5 subscribed 60:14 subset 48:3 suggested 46:2 46:5 suite 2:7,12 summary 17:13 summer 54:13 supervision 35:6,9
---	--	---	---

supervisor 33:4 35:2 36:14 supervisors 36:3 supervisory 34:5 supposed 42:10 sure 5:11,18 6:7,25 7:3 8:7 9:25 11:8 14:23 16:6 20:1,24 21:6 28:20,24 29:1 33:3 34:2 35:19 39:19 40:11 41:3 44:23 45:19 49:8,14,22 53:1 surprised 26:7 swimwear 20:3 switching 52:5 sworn 4:18 60:14 system 30:3	55:11 tallahassee 22:2,5,24 23:9 26:17,25 27:2 27:6 30:2 46:10,14,20 47:1,25 50:25 51:3,14,15,18 51:24 52:3 teeing 41:21 tell 6:6 13:17 32:16 43:2 44:9,13,19 46:22 50:3 52:14 ten 45:12 term 25:4 terminology 22:18 27:24 46:18 48:5,7 48:21 49:10 50:13,18 51:1 53:22 terms 5:13 6:21 7:4 24:1 35:16 36:9,14 37:11 37:25 53:22 testified 4:19 testifying 8:12 testimony 10:14 13:25 17:13 25:13,22 27:12 49:9 57:8 58:9,17 60:8	thank 5:2,17 7:20 13:6 14:17 15:12 17:17 20:4 24:23 30:11 41:11 53:7 55:23 56:5 theta 17:19,21 18:6 22:7 25:4 39:3 46:14 49:10 theta's 27:23 thing 8:16 14:6 41:9 things 5:11 21:4,17 29:4 40:18 43:5,17 46:17 48:9 think 8:24 9:18 11:14 12:24 20:5,5 21:1 22:1 25:24 30:12 31:1 32:7,24 33:23 35:21 39:18,19 41:22 45:8,20 45:22 50:22,23 51:6 thinks 6:25 third 17:8,11 thought 10:7 47:23 55:14 three 15:25 32:24 45:4	time 5:6,21 12:11,13 15:23 16:16,16 21:3 24:5,18 26:25 30:17 33:11 38:5 43:10 45:5,9,11,20 46:19 47:15 48:3,6 49:17 49:20,20 50:1 51:14 54:8,17 56:1,2,3 57:6,6 57:10 58:18 timeframe 47:4 58:8 times 7:24 46:5 title 17:3,4,6 33:15 today 10:16 25:22 30:18 37:19 42:13 together 41:5 55:2 toggle 15:4 told 35:22 46:20 top 10:17 14:7 16:10,14,18 18:25 topics 52:5 track 40:17 tracked 23:19 trademark 1: 1:2 3:13 10:18 10:22,23 11:15
t			
t 1:14,14 59:3,3 take 15:23 47:22 48:24 taken 1:15 49:4 57:5,14 talk 5:21 7:13 talking 11:14 26:24 37:16 47:5 54:24			

11:16,18 13:3 13:5 14:1 18:13 19:10 38:8 39:1 52:7 trademarks 38:4 39:13,15 40:1,25 trainer 24:5,9 training 23:19 23:20 24:4,4 transcribed 57:12 transcript 3:17 7:4 56:8 57:14 58:6,19 60:5,8 trenton 2:13 trial 1:2 10:18 10:23 14:1 true 33:6,8 57:13,19 60:8 try 12:17 trying 7:3 8:7 34:2 35:11 47:19 49:25 turner 23:23 two 15:14 41:21 53:14 type 7:11 40:18 41:8 43:5 48:5 48:13 52:20 types 10:22 typical 43:17 43:20	u uh 12:23 27:20 28:17 30:14 44:12 47:3 under 8:12 23:23 57:7,18 57:18 understand 6:6 6:16,24 7:16 8:8,11 13:24 34:2 35:19 40:11 49:8 55:24 understandable 27:10 understanding 11:3,18 12:25 37:9 38:3,7 45:6 understood 44:23 united 1:1 university 18:1 21:7 update 30:23 32:22 updated 10:14 updates 30:20 upper 12:20 upsilon 18:1 use 12:1,5 17:18 18:5 20:10,14,18 25:3 27:15,23 30:4,4,6 37:25	38:17,22 39:7 39:9 41:4 48:4 49:9 50:4 52:15,17 53:22 used 40:25 44:14,16 45:5 46:18 47:8,8 47:12 49:17,19 51:1 58:19 uses 38:25 using 30:1 39:2 39:5,7 46:6 48:20 51:18	version 9:11 19:5 versus 16:12 vice 23:5 video 1:12,16 9:14 virtual 5:22 vote 43:11,12 43:18 44:18 51:20 52:20 voting 23:7 43:14,15 vs 1:7
		v v 34:8 58:4 59:1 60:1 validity 11:11 vantage 5:15 variety 21:17 vending 54:22 vendor 39:6,10 40:14 53:4 vendors 52:6 52:10,16,19 53:14,16,21,25 54:8,17 verbal 6:19 verbally 7:2 verge 5:6 verify 58:9 veritext 58:14 58:23 veritext.com 58:15	w wacker 2:6 wait 7:8 waive 4:8 walk 46:16 53:18 want 5:11 6:7 7:9 9:10 14:23 18:21 21:19 23:11 28:24 29:1 30:23 31:25 32:4 34:10,22 35:18 37:22 41:21 42:4 44:23 45:17 49:8 51:13 55:20 56:7 wanted 11:17 16:6 39:25 wants 40:14

washington 1:13,16 3:3,14 4:16,17,22 9:7 10:8 14:24 15:3 16:4 17:12 18:18 19:1 28:7,15 30:12 31:12 32:12 33:1 34:1,13,21 37:8 40:8 42:17,22 45:3 47:17 49:7 51:13 53:13 55:22 58:5 59:2,24 60:2,4 60:12 way 5:12,15 48:12 we've 39:16 wear 44:16 web 18:25 website 19:10 38:20 41:4 weekend 5:7 55:25 welcome 24:25 went 21:2 west 2:12 4:24 willard 2:10 4:12 willardalonzo 2:14 williard 2:11	wisconsin 21:17,22 witness 3:3 4:16 7:22 42:5 42:9 57:7,8 58:8,10,12,18 word 14:12 18:21,21 19:21 36:10 wording 18:20 28:25 45:7 words 19:25 45:17 work 22:6 26:13 35:10 worked 21:16 21:16 22:2 workforce 21:18,23 working 21:18 21:23 39:12 41:5 43:10 works 5:20 wrong 5:11 47:1	year 55:14 year's 55:9 years 21:15 45:12 55:11
		z
		zoom 1:12,16 14:8
	x	
	x 3:1 xio1666 57:3 57:24	
	y	
	yeah 23:13 46:21 48:1 49:14	

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.

STTP DOCUMENT 001

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Alpha Kappa Alpha Sorority v. Stroll to the Polls, Inc.	Opposer, Applicant.	Opposition No. 91267937 Mark: STROLL TO THE POLLS Serial No. 90012428 Filed: June 20, 2020 Published: Nov. 03, 2020
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NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that, pursuant to 37 CFR § 2.123(c), TMBP 703.01, and the Federal Rules of Civil Procedure, Applicant Stroll to the Polls, Inc. will take the deposition upon oral cross-examination of **DORCAS E. WASHINGTON**, commencing at 4:00pm ET on Thursday, August 29, 2024, at 36 W Lafayette St., Suite 103, Trenton, NJ 08608, via Virtual Zoom or other videoconference technology before a notary public or other officer authorized to administer oaths.

The deposition will be recorded by stenographic and audiovisual means.

Dated: August 28, 2024

/ willard a stanback /

Willard A. Stanback
WILLARD ALONZO STANBACK, PC
36 West Lafayette Street, Suite 103
Trenton, New Jersey 08608
Telephone: 855-614-1111
Facsimile: 609-751-5121
willardalonzo@stanback-pc.com
Attorneys for Applicant Stroll to the Polls, Inc.

STTP DOCUMENT 002

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of **STROLL TO THE POLLS** Ser. No. 90/012,428

Alpha Kappa Alpha Sorority

Opposer,

v.

Stroll to the Polls, Inc.

Applicant.

Opposition No. 91,267,937

**OPPOSER ALPHA KAPPA ALPHA SORORITY'S FIRST AMENDED PRETRIAL
DISCLOSURES**

Pursuant to Rule 2.121(e) of the Trademark Rules of Practice, Opposer, Alpha Kappa Alpha Sorority ("AKA"), provides the following pretrial disclosures to Applicant, Stroll to the Polls, Inc. ("STTP"):

I. Witnesses

AKA discloses the following information regarding the witnesses from whom it intends to take testimony:

Name and Contact Information	Position	General Summary of Testimony Subjects
Dr. Nicole Barrett 5656 South Stony Island Ave. Chicago, IL 60637 (773) 684-1282 *Dr. Barrett should only be contacted through AKA's counsel.	Deputy Director of AKA	AKA's use of the phrase "stroll to the polls"; third- party uses of the phrase "stroll to the polls"

STTP 102

<p>Dr. Erin Sylvester Philpot</p> <p>Florida State University The Center for Leadership and Service 100 South Woodward Avenue Tallahassee, FL 32306 850-644-3342 esylvester@fsu.edu</p>	<p>Assistant Director for Leadership & Identity at Florida State University</p>	<p>Use of the phrase “stroll to the polls” by Florida State University, Florida A&M University, the League of Women Voters, Florida PIRG Students, Campus Election Engagement Project, and the Leon County Supervisor of Elections Office</p>
<p>Priestley Johnson</p> <p>Civic Nation P.O. Box 34673 1400 L Street NW Washington, D.C. 20005 202-908-5226 priestley@civcnation.org</p>	<p>Director of Strategic Community Partnerships at When We All Vote, a project of Civic Nation</p>	<p>Use of the phrase “stroll to the polls” by When We All Vote/Civic Nation, Zeta Phi Beta sorority, and Phi Beta Sigma fraternity</p>
<p>Dorcas E. Washington</p> <p>Delta Sigma Theta Sorority, Incorporated 1707 New Hampshire Ave. NW Washington, D.C. 20009 202-986-2400 DWashington@deltasigmatheta.org</p>	<p>Executive Director of Delta Sigma Theta Sorority, Incorporated</p>	<p>Use of the phrase “stroll to the polls” by Delta Sigma Theta Sorority, Incorporated</p>

II. Evidence

During its testimony period, AKA intends to introduce documents and evidence regarding AKA’s use of the phrase “stroll to the polls”; third-party uses of the phrase “stroll to the polls”; and STTP’s efforts to register “stroll to the polls” as a trademark.

Dated: February 27, 2024

Respectfully submitted,

PATTISHALL, McAULIFFE, NEWBURY,
HILLIARD & GERALDSON LLP

By: /Jessica A. Ekhoﬀ/

Jessica A. Ekhoﬀ
Felicia G. Traub
200 South Wacker Drive, Suite 2900
Chicago, Illinois 60606
(312) 554-8000
jae@pattishall.com
fgt@pattishall.com

*Attorneys for Opposer,
Alpha Kappa Alpha Sorority*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing OPPOSER ALPHA KAPPA ALPHA SORORITY'S FIRST AMENDED PRETRIAL DISCLOSURES was served upon the counsel for Stroll to the Polls, Inc. identified below by email on February 27, 2024:

Willard A. Stanback
Willard Alonzo Stanback PC
36 West Lafayette Street, Suite 103
Trenton, NJ 08608
willardalonzo@stanback-pc.com

/Jessica A. Ekhoﬀ/

STTP DOCUMENT 003

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 90012428

Filing Date: 06/20/2020

NOTE: Data fields with the * are mandatory under TEAS Plus. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.

The table below presents the data as entered.

Input Field	Entered
TEAS Plus	YES
MARK INFORMATION	
*MARK	STROLL TO THE POLLS
*STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
LITERAL ELEMENT	STROLL TO THE POLLS
*MARK STATEMENT	The mark consists of standard characters, without claim to any particular font style, size, or color.
REGISTER	Principal
APPLICANT INFORMATION	
*OWNER OF MARK	Ramona Prioleau
*MAILING ADDRESS	2266 Fifth Ave., #728
*CITY	New York
*STATE (Required for U.S. applicants)	New York
*COUNTRY/REGION/JURISDICTION/U.S. TERRITORY	United States
*ZIP/POSTAL CODE (Required for U.S. and certain international addresses)	10037
*EMAIL ADDRESS	XXXX
WEBSITE ADDRESS	https://strolltothepolls.org
LEGAL ENTITY INFORMATION	
*TYPE	INDIVIDUAL
*COUNTRY/REGION/JURISDICTION/U.S. TERRITORY OF CITIZENSHIP	United States
GOODS AND/OR SERVICES AND BASIS INFORMATION	
*INTERNATIONAL CLASS	025
*IDENTIFICATION	Aprons; Bibs, not of paper; Bodysuits; Dresses; Footwear; Hats; Jackets and socks; Pants; Shirts; Skirts; Swimwear

STTP 003

* FILING BASIS	SECTION 1(a)
FIRST USE ANYWHERE DATE	At least as early as 00/00/2018
FIRST USE IN COMMERCE DATE	At least as early as 00/00/2018
SPECIMEN FILE NAME(S)	
ORIGINAL PDF FILE	SPE0-1-6812923780-2020062 0230741446166 . Stroll to the Polls TM Attachement - Class 25.pdf
CONVERTED PDF FILE(S) (7 pages)	\\TICRS\EXPORT18\IMAGEOUT 18\900\124\90012428\xml1\ FTK0003.JPG
	\\TICRS\EXPORT18\IMAGEOUT 18\900\124\90012428\xml1\ FTK0004.JPG
	\\TICRS\EXPORT18\IMAGEOUT 18\900\124\90012428\xml1\ FTK0005.JPG
	\\TICRS\EXPORT18\IMAGEOUT 18\900\124\90012428\xml1\ FTK0006.JPG
	\\TICRS\EXPORT18\IMAGEOUT 18\900\124\90012428\xml1\ FTK0007.JPG
	\\TICRS\EXPORT18\IMAGEOUT 18\900\124\90012428\xml1\ FTK0008.JPG
	\\TICRS\EXPORT18\IMAGEOUT 18\900\124\90012428\xml1\ FTK0009.JPG
SPECIMEN DESCRIPTION	Screenshots and Photo
ADDITIONAL STATEMENTS INFORMATION	
*TRANSLATION (if applicable)	
*TRANSLITERATION (if applicable)	
*CLAIMED PRIOR REGISTRATION (if applicable)	
*CONSENT (NAME/LIKENESS) (if applicable)	
*CONCURRENT USE CLAIM (if applicable)	
CORRESPONDENCE INFORMATION	
NAME	Ramona Priolcau
PRIMARY EMAIL ADDRESS FOR CORRESPONDENCE	gotv@strolltothepolls.org
SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES)	NOT PROVIDED
FEE INFORMATION	
APPLICATION FILING OPTION	TEAS Plus
NUMBER OF CLASSES	1
APPLICATION FOR REGISTRATION PER CLASS	225
*TOTAL FEES DUE	225
*TOTAL FEES PAID	225
SIGNATURE INFORMATION	

* SIGNATURE	/Ramona Prioleau/
* SIGNATORY'S NAME	Ramona Prioleau
* SIGNATORY'S POSITION	Founder
* DATE SIGNED	06/20/2020

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 90012428

Filing Date: 06/20/2020

To the Commissioner for Trademarks:

MARK: STROLL TO THE POLLS (Standard Characters, see [mark](#))

The literal element of the mark consists of STROLL TO THE POLLS. The mark consists of standard characters, without claim to any particular font style, size, or color.

The applicant, Ramona Prioleau, a citizen of United States, having an address of

2266 Fifth Ave., #728
New York, New York 10037
United States
XXXX

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

For specific filing basis information for each item, you must view the display within the Input Table.

International Class 025: Aprons; Bibs, not of paper; Bodysuits; Dresses; Footwear; Hats; Jackets and socks; Pants; Shirts; Skirts; Swimwear

Use in Commerce: The applicant is using the mark in commerce on or in connection with the identified goods/services. The applicant attaches, or will later submit, one specimen as a JPG/PDF image file showing the mark as used in commerce on or in connection with any item in the class of listed goods/services, regardless of whether the mark itself is in the standard character format or is a stylized or design mark. The specimen image file may be in color, and the image must be in color if color is being claimed as a feature of the mark.

In International Class 025, the mark was first used by the applicant or the applicant's related company or licensee predecessor in interest at least as early as 00/00/2018, and first used in commerce at least as early as 00/00/2018, and is now in use in such commerce. The applicant is submitting one(or more) specimen(s) showing the mark as used in commerce on or in connection with any item in the class of listed goods/services, consisting of a(n) Screenshots and Photo.

Original PDF file:

[SPE0-1-6812923780-2020062 0230741446166 . Stroll to the Polls TM Attachement - Class 25.pdf](#)

Converted PDF file(s) (7 pages)

[Specimen File1](#)

[Specimen File2](#)

[Specimen File3](#)

[Specimen File4](#)

[Specimen File5](#)

[Specimen File6](#)

[Specimen File7](#)

For informational purposes only, applicant's website address is: <https://strolltothepolls.org>

The applicant's current Correspondence Information:

Ramona Prioleau

PRIMARY EMAIL FOR CORRESPONDENCE: gotv@strolltothepolls.org

SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES): NOT PROVIDED

Requirement for Email and Electronic Filing: I understand that a valid email address must be maintained by the applicant owner/holder and the applicant owner's/holder's attorney, if appointed, and that all official trademark correspondence must be submitted via the Trademark

Electronic Application System (TEAS).

A fee payment in the amount of \$225 has been submitted with the application, representing payment for 1 class(es).

Declaration

☐ **Basis:**

If the applicant is filing the application based on use in commerce under 15 U.S.C. § 1051(a):

- ☒ The signatory believes that the applicant is the owner of the trademark/service mark sought to be registered;
- ☒ The mark is in use in commerce and was in use in commerce as of the filing date of the application on or in connection with the goods/services in the application;
- ☒ The specimen(s) shows the mark as used on or in connection with the goods/services in the application and was used on or in connection with the goods/services in the application as of the application filing date; and
- ☒ To the best of the signatory's knowledge and belief, the facts recited in the application are accurate.

And/Or

If the applicant is filing the application based on an intent to use the mark in commerce under 15 U.S.C. § 1051(b), § 1126(d), and/or § 1126(e):

- ☒ The signatory believes that the applicant is entitled to use the mark in commerce;
 - ☒ The applicant has a bona fide intention to use the mark in commerce and had a bona fide intention to use the mark in commerce as of the application filing date on or in connection with the goods/services in the application; and
 - ☒ To the best of the signatory's knowledge and belief, the facts recited in the application are accurate.
- ☐ To the best of the signatory's knowledge and belief, no other persons, except, if applicable, concurrent users, have the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other persons, to cause confusion or mistake, or to deceive.
- ☐ To the best of the signatory's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, the allegations and other factual contentions made above have evidentiary support.
- ☐ The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that all statements made of his/her own knowledge are true and all statements made on information and belief are believed to be true.

Declaration Signature

Signature: /Ramona Prioleau/ Date: 06/20/2020

Signatory's Name: Ramona Prioleau

Signatory's Position: Founder

Payment Sale Number: 90012428

Payment Accounting Date: 06/22/2020

Serial Number: 90012428

Internet Transmission Date: Sat Jun 20 23:38:02 ET 2020

TEAS Stamp: USPTO/FTK-XX.XXX.XXX.XX-2020062023380271

2868-90012428-71056d48dd79c18b7b9821822c

85ef51a69ca7c2ea3ae6acfb56b81be64276ac-C

C-38009577-20200620230741446166

STROLL TO THE POLLS



**STROLL
TO THE POLLS**

XL	Nicaragua	
90% cotton / 10% polyester		
		

SHOP



Unisex Jersey Short Sleeve Tee
\$25.00

Color
White

Size
L



Unisex Jersey Long Sleeve Tee
\$30.00

Color
Black

Size
L



Infant Fine Jersey Bodysuit
\$17.93

Color
White

Size
12M





Embroidered Baby Bib (Pink)

\$16.99

Add to cart



Embroidered Baby Bib (Blue)

\$16.99

Add to cart



Embroidered Baby Bib (Gray)

\$16.99

Add to cart





Flip-Flops
\$19.99

Add to cart



Women's Sneakers
\$80.00

Size
US 6
Color
Black

Add to cart



Men's Sneakers
\$80.00

Color
Black
Size
US 9

Add to cart





Women's Varsity Jacket

\$80.00

Color

Black/White

Size

L

Add to cart



Men's Varsity Jacket

\$80.00

Size

L

Color

Black/Vintage Heather

Add to cart



Women's Leggings

\$40.00

Color

White Seams

Size

M

Add to cart





Women's Skater Skirt

\$40.00

Size

M

Weight

4 oz.

Add to cart



Women's Racerback Dress

\$40.00

Size

M

Add to cart



Women's One-piece Swimsuit

\$30.00

Color

Black

Size

M

Add to cart





Unisex Twill Hat
\$25.00

Add to cart



Embroidered Apron
\$30.00

Black

Out of stock



Socks
\$18.00

Add to cart

STTP DOCUMENT 004

ESTTA Tracking number: **ESTTA1352436**
Filing date: **04/15/2024**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding no.	91267937
Party	Plaintiff Alpha Kappa Alpha Sorority
Correspondence address	JESSICA A EKHOFF PATTISHALL MCAULIFF NEWBURY HILLIARD & GERALDSON LLP 200 SOUTH WACKER DRIVE SUITE 2900 CHICAGO, IL 60606 UNITED STATES Primary email: jae@pattishall.com Secondary email(s): fgt@pattishall.com, pam@pattishall.com 312-554-8000
Submission	Testimony For Plaintiff
Filer's name	Jessica A. Ekhoﬀ
Filer's email	jae@pattishall.com, jgv@pattishall.com
Signature	/Jessica A. Ekhoﬀ/
Date	04/15/2024
Attachments	Declaration of Dorcas Washington.pdf(654099 bytes)

DECLARATION OF DORCAS E. WASHINGTON

1. I am the Executive Director at Delta Sigma Theta Sorority, Incorporated (“Delta”). I have held my position for at least one year. The contents of this declaration are within my personal knowledge.

2. In the course of conducting its regular business activities, Delta maintains records of past programs and events. These records are made at or near the time the programs and events were conducted. It is a regular practice of Delta’s business activities to make and keep these records. As the Executive Director at Delta, I am familiar with these records.

3. Since at least as early as July 21, 2012, Delta has used the phrase “stroll to the polls.” Specifically, Delta has used the phrase in promotion of voter turnout initiatives or events. Proof of such use is attached as Exhibits A and B to this declaration.

4. I believe the phrase “stroll to the polls” is a commonplace political slogan and not an indicator that goods or services come from a single person or entity.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 12th day of August 2022 in Fort Worth, TX, Dorcas E. Washington

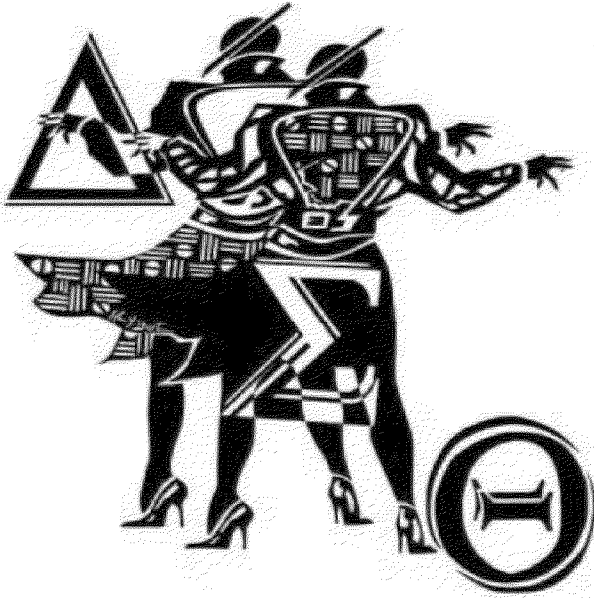
Digitally signed by Dorcas E.
Washington
Date: 2022.08.12 11:37:27 -04'00'

Exhibit A

Delta "Stroll to the Polls" Flyer
[See Flyer Attached Below.]

STROLL TO THE POLLS

Saturday Early Voting



Calling All Deltas, Community Organizations, Churches, and other Greek Organizations In DeKalb County to Join SMALC, As We Stroll to the Polls!

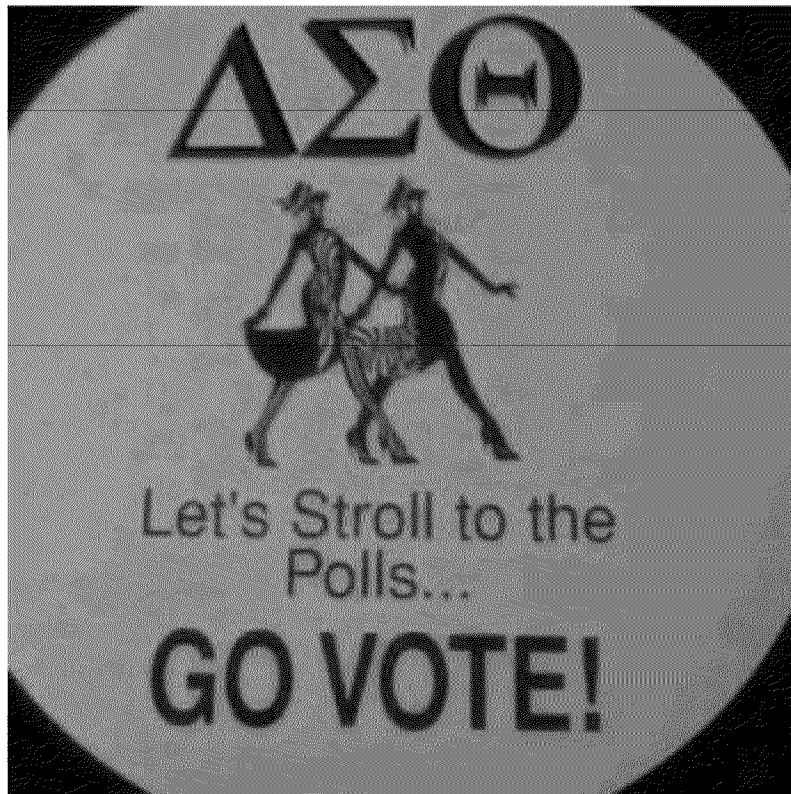
Saturday, July 21, 2012

8:30 a.m.

Kensington MARTA Station (parking lot)
3350 Kensington Road
Decatur, GA 30032

Bring your ID to vote.... Wear your paraphernalia...and Bring Friends!

Exhibit B
Delta "Stroll to the Polls" Button



STTP DOCUMENT 005



DELTA SIGMA THETA SORORITY, INC.

GRAND CHAPTER
CONSTITUTION AND BYLAWS

2023 Edition

This Constitution and Bylaws is published by and for Delta Sigma Theta Sorority, Inc., Grand Chapter, as authorized and adopted at the 56th National Convention.

This 33rd printing includes amendments adopted at the 56th National Convention, July 2023.

**DELTA SIGMA THETA SORORITY, INC.
1707 NEW HAMPSHIRE AVENUE, N.W.
WASHINGTON, DC 20009**

CONSTITUTION

TABLE OF CONTENTS

PREAMBLE	1
ARTICLE I – NAME	1
1 ARTICLE II – SORORITY CORPORATE SEAL	1
ARTICLE III – OBJECT	2
ARTICLE IV – MEMBERSHIP	2
ARTICLE V – OFFICERS, NATIONAL BOARD OF DIRECTORS, NATIONAL COMMITTEES AND NATIONAL COMMISSIONS	3
ARTICLE VI – DUES, FEES, AND FINANCE	4
ARTICLE VII – MEETINGS	4
ARTICLE VIII – INCORPORATION	5
ARTICLE IX – PARLIAMENTARY AUTHORITY	6
ARTICLE X – LIABILITY	6
ARTICLE XI – AMENDMENTS	7

BYLAWS

TABLE OF CONTENTS

ARTICLE I – DEFINITIONS	8
ARTICLE II – MEMBERSHIP	10
ARTICLE III – CHAPTERS	16
ARTICLE IV – REGIONS	24
ARTICLE V – DUTIES OF NATIONAL AND REGIONAL OFFICERS	25
ARTICLE VI – NATIONAL BOARD OF DIRECTORS	33
ARTICLE VII – NATIONAL STANDING COMMITTEES, COMMISSIONS, AND REGIONAL COMMITTEES	36
ARTICLE VIII – NATIONAL HEADQUARTERS AND NATIONAL HEADQUARTERS STAFF	52
ARTICLE IX – ELECTIONS AND VOTING	54
ARTICLE X – DUES AND FEES	63
ARTICLE XI – FINANCIAL AID	69
ARTICLE XII – VIRTUAL MEETINGS AND ELECTRONIC COMMUNICATIONS	70
ARTICLE XIII – DISCIPLINE	71
ARTICLE XIV – BINDING ARBITRATION	78
ARTICLE XV – INDEMNIFICATION	79
ARTICLE XVI – PUBLICATIONS	80
ARTICLE XVII – QUORUM	80
ARTICLE XVIII – AUTHORIZATION	80
ARTICLE XIX – PARLIAMENTARY AUTHORITY	81
ARTICLE XX – AMENDMENTS	81
ARTICLE XXI – BYLAWS	82
INDEX	83

**CONSTITUTION OF
DELTA SIGMA THETA
SORORITY, INCORPORATED**

PREAMBLE

We, the duly constituted Grand Chapter of the Delta Sigma Theta Sorority, Inc., in order to form a closer union among college-educated women for the fostering of high ideals in moral, social, and intellectual life, and the assisting of our members in every possible way, do hereby establish this *Constitution* for the government of the extra and intra-fraternal relations of this Sorority. Chapters and sorors now existent, chapters organized, and sorors inducted hereafter, shall be bound by the government established in this *Constitution* and its *Bylaws* as may be amended from time to time. This is the official operating document of the Sorority, as voted upon by the Grand Chapter. Therefore, any provision in any other document that conflicts with this document is null and void.

ARTICLE I – NAME

The name of this organization shall be the Grand Chapter of the Delta Sigma Theta Sorority, Inc., commonly known as Delta Sigma Theta Sorority, Inc. and hereinafter referred to as “the Sorority.”

**ARTICLE II – SORORITY
CORPORATE SEAL**

The Sorority shall have a corporate seal that shall be in the form of a circle and shall have inscribed thereon the name of the Sorority and “1913.” The National Secretary shall be the custodian of the Sorority seal.

ARTICLE III – OBJECT

The principal purposes and aims of this Sorority shall be to engage in cultural, educational, advocacy and service activities; to establish, maintain, and encourage high cultural, intellectual and moral standards; and to direct and guide the chapters of the Sorority established under the authority and sanction of this organization.

ARTICLE IV – MEMBERSHIP

Section 1. INDIVIDUAL MEMBERS

- A. The Grand Chapter shall consist of all sorors duly initiated by any chapter who are financial, both with the Grand Chapter and a chapter, or are members-at-large, and those exempted from payment as stated in the *Bylaws*.
- B. The categories of membership shall include collegiate, collegiate member at large, alumnae, alumnae member at large and honorary.

Section 2. CHAPTERS

There shall be collegiate and alumnae chapters, also known as, unincorporated associations pursuant to the Internal Revenue Code and Grand Chapter status as a 501(c)(7) organization.

Section 3. REGIONS

There shall be geographic sub-divisions known as Regions. Each chapter shall be assigned to a Region based on its geographic location.

**ARTICLE V – OFFICERS,
NATIONAL BOARD OF DIRECTORS,
NATIONAL COMMITTEES AND NATIONAL COMMISSIONS**

Section 1. OFFICERS

The officers of the Sorority shall be the following and such other officers as from time to time may be necessary:

Elected National Officers

International President and Chair of the
National Board of Directors
National First Vice President
National Second Vice President (who shall be a collegiate
at the junior or senior level)
National Secretary
National Treasurer

Elected Regional Officers

Regional Directors
Regional Representatives

Appointed National Officers

National Chaplain
Legal Advisor
National Parliamentarian (*For Convention Only*)
National Sergeant-at-Arms (*For Convention Only*)

Appointed Regional Officers

Regional Chaplain
Regional Parliamentarian (*For Regional Conference Only*)
Regional Sergeant-at-Arms (*For Regional Conference Only*)

Section 2. NATIONAL BOARD OF DIRECTORS

The members of the National Board of Directors shall be the following: Elected Officers as reflected under ARTICLE V – and ARTICLE VII Section 1 and 2 of the *Bylaws*, National Elected Committee Chairs and Board-Elected National Committee and Commission Chairs recommended by the International President, and the Immediate Past National President, or designee.

Section 3. NATIONAL COMMITTEES AND NATIONAL COMMISSIONS

National Committees and National Commissions shall be elected as provided in the *Bylaws*.

ARTICLE VI – DUES, FEES, AND FINANCE

The Grand Chapter shall be financed by the dues and fees from its membership, sponsorships, and other appropriate revenue sources including contributions.

ARTICLE VII – MEETINGS

Section 1. NATIONAL CONVENTIONS

The Grand Chapter shall assemble in National Convention at regular intervals. A meeting of the Grand Chapter may occur remotely in the event an in-person meeting is not feasible. Such meeting must be recommended by the International President and approved by a majority of the National Board of Directors.

Section 2. REGIONAL CONFERENCES

Regional Conferences shall be held in alternate years of National Conventions.

Section 3. CHAPTER MEETINGS

Each chapter shall meet monthly as determined by its Rules of Order.

ARTICLE VIII – INCORPORATION

Section 1.

In order that it may avail itself of, and have the advantages emanating from corporate existence, the Sorority shall exist as an incorporated body under the laws of the Congress and under Chapter 4 of Title 29 of the District of Columbia Nonprofit Corporation Act, as amended from time to time, said corporation having the power to carry on its business and activities within the District of Columbia, throughout the United States and its territories, and elsewhere.

Section 2.

The Corporation is operated exclusively as an organization within the meaning of Section 501(c)(7) of the Internal Revenue Code of 1986, as amended, as now in effect or as it may hereafter be amended.

The principal purposes and aims of the Corporation shall be: cultural, educational, advocacy and service; to establish, maintain, promote, and encourage high cultural, intellectual, and moral standards among its members and the members of its subordinate chapters, and to promote and encourage achievement in education, by granting scholarships, and other assistance, in accordance with its *Constitution and Bylaws*, to worthy and deserving members of its grand and subordinate chapters, and to other individuals at its discretion; to govern, supervise, control, and regulate sorors and the numerous chapters now existing and operating under the authority and sanction of the Corporation, which subordinate chapters are now reporting to the Corporation; to institute and charter undergraduate and mixed chapters at the seat of colleges and universities of recognized standing, and alumnae chapters in localities where there are sufficient graduate members to warrant same; to govern, supervise, control, and

regulate these chapters so established in accordance with its *Constitution and Bylaws*; to have full and sole authority over the ritualism of the Corporation, promulgated for the guidance of the subordinate chapters, and to revise, compile, promulgate, and issue the same whenever the Corporation deems it necessary; to have complete and final authority to hear and determine all questions or controversies that may arise with sorors and in such said subordinate chapters, whether referred to the Corporation by them or otherwise; and to have full and complete and final authority to do and perform every lawful act and thing necessary and expedient for the efficient exercise of the powers herein conferred for the benefit and use of the Corporation and its subordinate chapters under applicable law.

Section 3.

For corporate purposes, the control and management of the corporation shall be vested in the National Board of Directors. The Executive Committee, which is comprised of the International President, National First Vice President, National Second Vice President, National Secretary and National Treasurer; shall act on behalf of the Board between meetings and in emergency situations and provide organizational direction on behalf of the Board for the Executive Director and headquarters operations. The International President shall be the immediate supervisor of the Executive Director.

ARTICLE IX – PARLIAMENTARY AUTHORITY

All matters not covered by the *Constitution and Bylaws* of the Sorority shall be governed by the current edition of *Robert's Rules of Order, Newly Revised*.

ARTICLE X – LIABILITY

The National Officers and the National Board of Directors of the Grand Chapter of the Sorority expressly disclaim responsibility for the actions of chapters or individual members who are in violation of either the letter or the spirit of this *Constitution and Bylaws* and any governing documents.

ARTICLE XI – AMENDMENTS

This *Constitution* may be amended by a two-thirds (2/3) vote of the voting delegates assembled in the National Convention, provided at least 60% of the chapters in good standing are present and represented.

Proposed amendments shall be published to the Grand Chapter by January 31 before the convening of the National Convention.

Upon the declaration of extenuating circumstances and to protect the best interests of the Sorority, as determined by the National Board of Directors; upon the recommendation of the International President the *Constitution* may also be amended by a two-thirds (2/3) vote of a virtual assembly of the voting delegates of Grand Chapter provided that at least 60 % of all chapters in good standing are represented.

In the instance of a declaration of extenuating circumstances by the National Board of Directors and upon the recommendation of the International President, proposed amendments shall be published to the Grand Chapter at least 60 days before the commencing of the virtual assembly.

Permission is herein granted to correct amendments for article and section designations, punctuation, grammar, cross-references and to make other technical and conforming changes as may be necessary.

THE BYLAWS OF DELTA SIGMA THETA SORORITY, INCORPORATED

ARTICLE I – DEFINITIONS

The following terms are defined in this article:

- A. A **soror** is a woman who has been duly initiated into the Sorority.
- B. A **member** is any soror who pays dues to a chapter and to Grand Chapter, or who pays a member-at-large fee, or who is exempt from payment of Grand Chapter dues and fees as stated in ARTICLE X - DUES AND FEES, Section 14. EXEMPTION FROM PAYMENT OF GRAND CHAPTER DUES AND FEES.
- C. **Membership Categories**
 - 1. An **alumnae member** is a soror who has paid dues to an alumnae chapter and is not matriculating at a college or university in a program leading to an initial baccalaureate degree or its equivalent. If the soror has not completed her initial baccalaureate degree or its equivalent and has returned to an educational institution to complete requirements for said degree, she has the option of joining the collegiate chapter, provided she has not paid dues to an alumnae chapter.
 - 2. A **collegiate member** is a soror who is matriculating at a college or university pursuing work leading to an initial baccalaureate degree or its equivalent.
 - 3. An **alumnae member at large** is an alumnae soror who elects to affiliate only with Grand Chapter.
 - 4. A **collegiate member at large** is a soror who may elect to affiliate only with Grand Chapter. To be eligible for collegiate member-at-large membership, a soror must maintain a cumulative grade point average of 2.75 on a 4.0

scale or a 1.75 on a 3.0 scale **and** be enrolled at a college or university where the **chapter** has been retired or suspended; or the college or university has terminated its support/contract with the Sorority; or the soror has transferred to an institution where there is not a chapter.

5. An **honorary member** is a soror who has distinguished herself by making an extraordinary contribution in her field. Her accomplishments have resulted in a significant impact on the national or global community.

D. Life Memberships

1. A **Life Member** is a soror who has paid in full a Life Membership fee prior to 1963.
2. A **Golden Life Member** is a soror who has paid in full one of two specified Golden Life Membership fees.
3. A **Diamond Life Member** is a soror who has paid in full the specified Diamond Life Membership fee.

- E. A **chapter** is the local branch of the Sorority designated by geographic location or college or university campus that consists of members who have paid dues to Grand Chapter and the chapter.

F. Delegates

1. **Voting Delegate** - the member who has been designated by her chapter to represent it at a National Convention or Regional Conference.
2. **Alternate Delegate** - the member who has been designated by her chapter to take the seat of the voting delegate and act in her absence.
3. **Non-voting Delegate** - any member who registers for and attends a National Convention or Regional Conference who is neither a voting nor an alternate delegate.

- G. A **quorum** is the minimum number of members who must be present at the meeting for business to be validly transacted.
- H. A **majority vote** is more than half of the votes cast by members entitled to vote, excluding blanks, or abstentions at a properly called meeting. (Example: $19 \times \frac{1}{2} = 9 \frac{1}{2}$. 10 votes needed for majority.)
- I. A **legacy** is a daughter or granddaughter of a soror.

ARTICLE II – MEMBERSHIP

Section 1. REQUIREMENTS FOR COLLEGIATE MEMBERSHIP INTAKE

- A. Any woman of good character is eligible for collegiate membership in the Sorority provided that she:
 - 1. must demonstrate involvement in public service activities;
 - 2. is matriculating at a college or university, approved by the National Scholarship and Standards Committee, in day, evening or extension classes as a student pursuing work leading to an initial baccalaureate degree or its equivalent;
 - 3. has completed at least 24 semester hours or 36 quarter hours at a college or university recognized by the US Department of Education, the Council of Higher Education or the equivalent international accreditation agency and is currently enrolled as a part-time or full-time student as defined by the college or university;
 - 4. has submitted a completed Application for Membership packet which includes an official transcript showing a minimum cumulative grade point average of 2.75 on a 4.0 scale or 1.75 on a 3.0 scale, which transcript must be emailed directly to the chapter from the appropriate college or university;
 - 5. has been approved for membership by majority vote of the members of the chapter through which she is to be

- initiated. The chapter vote is final. Absent a violation of the Sorority's Membership Intake Program, a chapter vote shall be upheld;
6. has been approved for membership by the Regional Director of which the initiating chapter is a part;
 7. has never been a member of, nor has been expelled from, any society holding membership in the National Pan-Hellenic Council, Inc., the Panhellenic Conference, Inc., the National Multicultural Greek Council, Inc., or the Interfraternity Council;
 8. meets all financial requirements of the Grand Chapter and the initiating chapter; and
 9. meets all requirements for membership as outlined in the Administrative Procedures for Membership Intake and procedural manuals approved by the Board of Directors.
- B. Any woman who has received or completed the requirements for a baccalaureate degree or its equivalent is ineligible for membership in a collegiate chapter, even if she remains at that institution to pursue another baccalaureate degree or its equivalent.

Section 2. REQUIREMENTS FOR ALUMNAE MEMBERSHIP INTAKE

- A. Any woman of good character is eligible for alumnae membership in the Sorority provided that she:
1. must demonstrate involvement in public service activities;
 2. lives in a primary residence which must:
 - (a) Be in the chapter service area as identified by the chapter charter or source documentation provided from National Headquarters or Regional Director;
 - (b) Not be in the service area of any other chapter, and the residence is within the same region, and 50 miles of the chapter's service area.
 3. holds a baccalaureate or its equivalent or higher degree from

an accredited college, university or professional school that is recognized by the US Department of Education, the Council of Higher Education or the equivalent international accreditation agency;

4. has submitted a completed Application for Membership packet which includes an official transcript showing a minimum cumulative grade point average of 2.75 on a 4.0 scale or 1.75 on a 3.0 scale, which transcript must be emailed directly to the chapter from the appropriate college or university. The grade point average requirement is not applicable where the applicant demonstrates that:
 - it has been 10 years or more since she has received her baccalaureate degree or its equivalent; or
 - she has received a professional designation equivalent to a master's degree or above; or
 - she has received a post graduate degree or a professional designation equivalent (International Chapters only).
5. has never been, nor has been expelled from, any society holding membership in the National Pan-Hellenic Council, Inc., the Panhellenic Conference, Inc., National Multicultural Greek Council Inc, or the Interfraternity Council;
6. has been approved for membership by majority vote of the members of the chapter through which she is to be initiated. The chapter vote is final. Absent a violation of the Sorority's Membership Intake Program, a chapter vote shall be upheld;
7. has been approved for membership by the Regional Director of which the initiating chapter is a part;
8. meets all financial requirements of the Grand Chapter and the initiating chapter; and
9. meets all the requirements as outlined in the Sorority's Membership Intake Program and in the procedural manuals approved by the National Board of Directors.

Section 3. REQUIREMENTS FOR HONORARY MEMBERSHIP

- A. Honorary Members shall be women who have made extraordinary contributions in their field and have made significant impact on the national or global community consistent with the Sorority's programmatic thrust. An Honorary Member **must** exemplify the Cardinal Principles of the Sorority. An individual may be considered for honorary membership into the Sorority provide she is:
1. recommended by a member or chapter(s) to a Special Committee for Honorary Member Selection appointed by the International President. The Committee should have experience in vetting and identifying prodigious talent;
 2. recommended by the Honorary Member Selection Committee to the National Board of Directors;
 3. approved by a 2/3 vote of the National Board of Directors; and
 4. initiated during the National Convention closest to the candidate's acceptance of the Sorority's invitation to become an Honorary Member. The invitation shall be completed within one of two sequential National Convention cycles. Initiation may also occur at a time and place as recommended by the International President and approved by the National Board of Directors.
- B. An Honorary Member shall have all privileges of membership except those of voting and holding elective office.

Section 4. CHAPTER RESPONSIBILITY FOR MEMBERSHIP INTAKE

- A. All chapters shall adhere to the Sorority's Membership Intake Program as outlined in the Administrative Procedures for Membership Intake and procedural manuals in extending membership to applicants receiving the majority vote of the chapter and approval of the Regional Director.

- B. All requests for membership intake must be submitted to the Regional Director for processing between September 1 and March 1 of each fiscal year. All related activities must be completed by April 30.
- C. No chapter shall plan or implement any membership intake activities, procedures, or practices that deviate from the Sorority's Membership Intake Program, except as provided in Section 4-D of this Article.
- D. A chapter may implement membership intake activities, procedures, or practices that deviate from the Sorority's Membership Intake Program only in those instances where a college or university rules and regulations require such deviation. There shall, however, be no deviation from the academic requirement; in all instances an applicant for membership must meet the academic requirements as stated in ARTICLE II - MEMBERSHIP, Section 1. REQUIREMENTS FOR COLLEGIATE MEMBERSHIP INTAKE.
- E. Individuals may be denied acceptance to membership in the Sorority upon written decision of the Regional Director for reasons outlined in the Membership Intake Program of the Sorority.
- F. All applicants that apply for membership will be charged a nonrefundable application processing fee in the amount of \$15 for collegiate and \$30 for alumnae. This is an administrative fee that will be used to defray the chapter expenses associated with the selection process.

Section 5. REQUIREMENTS FOR MEMBERSHIP IN CHAPTERS

A. Collegiate Chapters

1. Any soror who is matriculating at a college or university

while pursuing an initial baccalaureate degree or its equivalent shall be accepted to membership in the chapter that serves that campus provided that she:

- a) satisfies all financial requirements of Grand Chapter;
 - b) pays dues to that collegiate chapter;
 - c) carries a minimum load equivalent to what is required of a half-time student; and
 - d) maintain a minimum cumulative grade point average of 2.75 on a 4.0 scale or a 1.75 on a 3.0 scale.
2. Any member returning to a college or university to complete requirements for her initial baccalaureate degree or its equivalent may elect to continue membership in an alumnae chapter or become active with the chapter that serves that institution.

B. Alumnae Chapters

1. Any soror who has completed, or temporarily suspended pursuit of, her baccalaureate degree or its equivalent is eligible to become a member of an alumnae chapter provided that she:
 - a) satisfies all financial requirements of Grand Chapter; and
 - b) pays dues to that chapter.
2. Any alumnae soror may select the chapter of her membership in those communities in which there are two or more alumnae chapters.
3. Receipt of a baccalaureate degree or its equivalent is not required of a soror for alumnae chapter membership.

C. Transferring membership from one chapter to another is complete upon:

1. verification of membership in the Sorority;

2. payment of the new chapter's dues; and
 3. payment of Grand Chapter dues, or verification of payment through the previous chapter.
- D. A soror shall not hold membership in more than one chapter at a time.

ARTICLE III – CHAPTERS

Section 1. ESTABLISHMENT AND MAINTENANCE

A chapter of the Sorority shall be established upon the recommendation of the Regional Director with the approval of the International President and National First Vice President.

A. Collegiate Chapters

A collegiate chapter may be established as a campus-based chapter, a city-wide chapter or a core chapter and shall be composed of collegiate members as defined in ARTICLE II - MEMBERSHIP, Section 5. REQUIREMENTS FOR MEMBERSHIP IN CHAPTERS. Once established, a collegiate chapter with fewer than seven members, must request and receive special dispensation to function in any given sorority year. The Regional Director shall inform the National Scholarship and Standards Committee.

1. A campus-based chapter may be established at an accredited four-year college or university approved by the National Scholarship and Standards Committee. Said chapter shall consist of a minimum of seven women meeting the requirements of collegiate membership as set forth in ARTICLE II - MEMBERSHIP, Section 5. REQUIREMENTS FOR MEMBERSHIP IN CHAPTERS.
2. A city-wide collegiate chapter may be established in a given location. Said chapter shall consist of a minimum of seven women who are matriculating at accredited four- year

colleges and universities recognized by the US Department of Education, the Council of Higher Education or the equivalent international accreditation agency and approved by the National Scholarship and Standards Committee. Biennial Letters of Recognition and/or Memorandum of Understanding (MOU) shall be submitted from each institution where city-wide collegiate chapters are established in order for the institution to remain a part of the city-wide collegiate chapter's charter. The members shall meet the requirements of collegiate membership as set forth in ARTICLE II - MEMBERSHIP, Section 5. REQUIREMENTS FOR MEMBERSHIP IN CHAPTERS.

3. A core collegiate chapter may be established as a campus-based chapter that initiates its members from students at nearby accredited four-year colleges and universities that have been recognized by the US Department of Education, the Council of Higher Education or the equivalent international accreditation agency and approved by the National Scholarship and Standards Committee. Biennial Letters of Recognition and/or Memorandums of Understanding (MOU) shall be submitted from each institution where core chapters are established in order for the institution to remain a part of the core collegiate chapter's charter. A college or university official from each institution that has agreed to host a chapter must provide written consent to the Sorority. Said chapter shall consist of a minimum of seven women who meet the requirements for collegiate membership as set forth in ARTICLE II - MEMBERSHIP, Section 5. REQUIREMENTS FOR MEMBERSHIP IN CHAPTERS.

B. Collegiate Chapter Advisors

1. Each collegiate chapter shall have a minimum of two chapter advisors (primary and secondary). Any chapter that does not

have two certified advisors in accordance with the *Chapter Management Handbook* shall be made inactive by the Regional Director until a primary and secondary advisor has been selected and approved by the Regional Director. Where two advisors are not sustainable, the collegiate chapter must receive approval from the Regional Director.

2. The advisor(s) shall be selected by a committee of the campus-based chapter, the city-wide chapter or the core chapter and recommended to the chapter for a vote. The committee shall include the president, the vice president and one to three chapter members with the approval of the Regional Director.
3. The advisor shall:
 - a) be an alumnae member who resides in the community, and is a member of the alumnae chapter in that community; and
 - b) be a member in an alumnae chapter during the last two years; or
 - c) be a member at large during the last two years who resides in the community; and
 - d) have attended one of the last two National Conventions or Regional Conferences; and
 - e) have attended an advisor's workshop within the last two years; and
 - f) be knowledgeable about policies, procedures and programs of the Sorority.
4. Where the collegiate chapter does not have an alumnae chapter within 40 miles of the city or county line of the collegiate chapter, they shall consult the Regional Director to assist in the selection and approval of the closest qualified member(s) to serve as chapter advisor(s).
5. Where a college or university requires that one of its faculty or staff serve as an advisor to a chapter operating on its campus, the chapter shall comply with the institution's regulations in selecting the advisor. If an alumnae member

- serves on the faculty or staff of such an institution, the chapter shall seek permission from the institution to select the alumnae member as its advisor, with the consent of the alumnae member. Advisors shall also be appointed as provided in this section, unless such selection is contrary to rules of the institution.
6. The Regional Director shall approve all special considerations in selecting the advisor(s) and shall inform the National Scholarship and Standards Committee.
 7. The advisor shall:
 - a) guide collegiate chapters in developing and implementing programs and activities that comply with the Sorority's standards and policies;
 - b) act as a liaison between the collegiate chapter and the alumnae chapter(s); and
 - c) report to the Regional Director on the collegiate chapter's activities.
 8. Any advisor(s) who fails to adhere to duties as defined in these *Bylaws*, ARTICLE III - CHAPTERS, Section 1. ESTABLISHMENT AND MAINTENANCE, the *Chapter Management Handbook* and any specific directives given by the appropriate officers shall be discharged from her responsibilities as an advisor.

C. Alumnae Chapters

1. Initial chapter in a geographic area:
 - a) shall be composed of a minimum of 12 alumnae members;
 - b) each soror shall be a member of the Grand Chapter at the time of application;
 - c) each member shall reside in the area where the chapter is to be seated; and
 - d) the applicants must submit evidence that;
 - (1) the proposed chapter is capable of meeting continuing requirements of Grand Chapter;

- (2) the community can support a chapter; and
 - (3) the proposed chapter is capable of meeting community needs.
- 2. Once established, a chapter with fewer than 12 members must request and receive special dispensation to function in any given sorority year. The Regional Director shall inform the National Scholarship and Standards Committee.
- 3. Additional chapters in the same geographic area.
 - a) Any chapter established within 40 miles of the city or county line (herein referred to as the same geographic area) of an existing alumnae chapter is considered an additional chapter.
 - b) The application for chartering must consist of 24 members. Each additional chapter established in the city or locale shall be comprised of 12 additional members beyond the number required for the last chapter established - the third chapter ($24 + 12 = 36$ members); the fourth chapter ($36 + 12 = 48$ members).
 - c) All members submitting an application for the additional chapter must live in the area where the chapter is designated to serve.
 - (1) The geographic area of the additional chapter shall be the area assessed.
 - (2) Any new member initiated must reside in the area being served.
 - d) The group of members submitting an application for an additional alumnae chapter must submit evidence that:
 - (1) the community can support an additional chapter;
 - (2) the proposed chapter shall be capable of meeting continuing requirements of Grand Chapter; and
 - (3) the assessment of community needs clearly defines the social, educational and economic issues of the area.
 - e) A notice of filing of the application for an additional chapter shall be submitted to the existing chapter(s) in

the area following the submission of the application to National Headquarters.

- f) Each soror shall be a member of the Grand Chapter at the time the application is made.
- 4. A coordinating council, to include the presidents of the various chapters, must be established in geographic areas where there are more chapters of the Sorority to ensure coordination of programming, scheduling of events, eliminating duplication of functions and establishing boundaries within which each chapter is to operate. This activity will be monitored by the Regional Director.
- 5. Upon recommendation of the Regional Director, and the approval of the National First Vice President and the International President, the National Secretary shall issue a charter for the new chapter, which shall be established by the Regional Director.
- 6. All applications for Chapter Establishment must be submitted for processing between September 1 and March 1 of each year, and all related activities must be completed by April 30.

D. Incorporation by Chapters Prohibited

Chapters shall not incorporate but rather shall operate under the umbrella of the Grand Chapter, Delta Sigma Theta Sorority, Incorporated. Non-United States military-based international chapters shall be incorporated separately by Grand Chapter, Delta Sigma Theta Sorority Incorporated upon the recommendation of the International President and approval by the National Board of Directors.

Section 2. NOMENCLATURE

- A. Collegiate chapters shall be designated by the letters of the Greek alphabet, beginning with Alpha and rotating in regular order to

Omega. After the alphabet is exhausted, the letter “Alpha” is assigned as a constant component for the names of the chapters in these groups, placed first. When the alphabet is next exhausted, it will begin with “Beta” as the first constant component, and so on. The given name (the second component of the chapter name) shall rotate successively through the Greek alphabet in like manner. For example, Alpha Alpha, Alpha Beta, Alpha Gamma, etc. When the double alphabet is exhausted, chapter names will be assigned using three Greek letters. For example, Alpha Alpha Alpha, Alpha Alpha Beta, etc. A chapter shall not be assigned the name of any existing member group of the National Pan-Hellenic Council, Inc., the Panhellenic Conference, Inc. or the National Multicultural Greek Council, Inc.

- B. The initial alumnae chapter in a geographic area shall be identified by the name of the city and state in which it is located. Each additional alumnae chapter in the same geographic area shall submit a name along with the application, which meets the following criteria:
 - 1. incorporates official name of municipality or locale where the chapter is to be seated or chartered; for example, Detroit Motor City Alumnae, Boston Harbor City Alumnae; and
 - 2. this name shall be submitted to the Regional Director, the Chair of the National Scholarship and Standards Committee, and the International President.
- C. The final determination of the name of an alumnae chapter in an area shall be made jointly by the officers approving the chapter charter.

Section 3. CHAPTER RULES OF ORDER AND POLICIES AND PROCEDURES

All chapters shall be governed by Grand Chapter *Constitution and Bylaws* and shall execute an operating agreement as prescribed by the

Sorority from time to time to include chapter promulgated Rules of Order and Policies and Procedures. The Rules of Order and Policies and Procedures shall be submitted to the National Scholarship and Standards Committee for review, approval and compliance, and thereafter when amended by two-thirds vote of the chapter members present and voting.

Section 4. CHAPTER RESPONSIBILITY

- A. Each chapter shall:
 - 1. remit dues to National Headquarters as provided in ARTICLE X - DUES AND FEES for all members of the chapter;
 - 2. keep a record of all income and disbursements in a form prescribed by the Grand Chapter or according to generally accepted accounting principles;
 - 3. file all records and reports as required by the Grand Chapter, and be represented at each National Convention;
 - 4. be represented at every Regional Conference of its region;
 - 5. give evidence of a local program consistent with the national program of the Sorority;
 - 6. meet the corporate requirements of Grand Chapter by submitting annually the required fees, reports and forms listed on the Corporate Accountability Form;
 - 7. be required to carry general liability insurance in an amount as designated by the Sorority and approved by the National" Board of Directors;
 - 8. be covered by general bonding insurance which shall be provided through Grand Chapter; and
 - 9. be required to pay corporate fees as set out in ARTICLE X - DUES AND FEES, Section 4. CORPORATE FEES.
- B. In the event that the Grand Chapter is caused to incur legal expenses, including but not limited to, attorneys' fees, settlement amounts, judgment awards, interest and costs, as the result of claims or lawsuits arising out of the contracts, acts or conduct of

a particular chapter, its officers or members, the chapter from which such claim or lawsuit arose shall be liable to reimburse the Grand Chapter for all such expenses upon terms satisfactory to the National Board of Directors. Failure of a chapter to make such reimbursement shall result in the imposition of such disciplinary action against the chapter, as the National Board of Directors deems appropriate.

- C. Any chapter failing to remit the required fees, reports and forms shall be declared inactive immediately, and shall not proceed with the chapter program or membership intake until all corporate requirements are met and the Regional Director declares that the chapter is in compliance.
- D. Active status for failure to remit fees shall be resumed only upon payment of said fees to National Headquarters.
- E. Chapter Audit Requirement – The financial records of a chapter shall be audited by the internal audit committee, and by an external certified public accountant (if applicable), within 60 days of the close of each fiscal year. A copy shall be submitted to National Headquarters by February 28th.

ARTICLE IV – REGIONS

Section 1. OFFICERS

The officers of the region shall be:

Regional Director

Regional Representative

Section 2. MEMBERS

Chapters in the region as designated by the Grand Chapter shall be the members of the region.

Section 3. BUSINESS

- A. The business of the Regional Conference shall consist of:
 - 1. such matters as are referred to the Conference by the National Convention;
 - 2. such matters as are referred to the Conference by the National Board of Directors;
 - 3. recommendations to the National Board of Directors for Grand Chapter programs;
 - 4. interpretation of the Grand Chapter policies and programs to chapters of the Sorority;
 - 5. internal development workshops and training leading to more effective participation of members in the chapters of the Sorority; and
 - 6. election of Regional Directors, Regional Representatives, and other officers as may be authorized by these Bylaws.

ARTICLE V – DUTIES OF NATIONAL AND REGIONAL OFFICERS

Section 1. INTERNATIONAL PRESIDENT and CHAIR OF THE NATIONAL BOARD OF DIRECTORS

- A. It shall be the duty of the International President to provide leadership, administrative guidance and direction to the structure and programming of the Sorority and the National Board of Directors. She shall:
 - 1. serve as Chair of the National Board of Directors;
 - 2. serve as Chair of the National Convention Committee;
 - 3. preside over the National Convention;
 - 4. enforce the *Constitution and Bylaws*; Code of Conduct, policies and procedures, and other governing documents of the Sorority;
 - 5. annually establish a recommended pool comprised of members of the National Board of Directors to serve on

- appellate panels as assigned and adjudicate second level appeals pursuant to the disciplinary processes as outlined in the *Chapter Management Handbook*;
6. recommend to the National Board of Directors, for election, Chairs of National Standing Committees and Commissions for membership on the National Board of Directors.
 7. appoint members of National Committees, National Commissions, and National Convention Officers;
 8. recommend to the National Board of Directors:
 - a. the removal of any elected national officers or elected regional officer who fails to perform the duties of her office;
 - b. the removal of any Board Member that has been found to have violated the Code of Conduct;
 9. perform such ceremonies of the Grand Chapter as may be necessary and appropriate;
 10. strengthen public relations and maintain cooperative relations with other organizations;
 11. serve as an ex officio member of all national committees and commissions except the National Nominating Committee, with whom she may meet at its request, and as an ex officio member of the National Scholarship and Standards Committee, provided that, she shall recuse herself from all disciplinary matters;
 12. in concert with the Executive Committee, provide organizational direction for the National Headquarters and serve as the immediate supervisor of the Executive Director and ensure that the established policies of the Grand Chapter and the National Board of Directors are executed;
 13. stimulate growth and development of the organization;
 14. exercise all powers and duties generally pertaining to the office of International President and Chair of the National Board of Directors;

15. work with the Regional Directors in coordinating their efforts and maintaining alignment and unity in the Sorority's objectives and program;
16. serve as an ex officio member of the Board of Directors of any related organization of the Sorority; and
17. be responsible for a corporate report to the National Convention which would include program status, financial status and program projection.

Section 2. NATIONAL FIRST VICE PRESIDENT

- A. It shall be the duty of the National First Vice President to:
 1. serve as Chair of the National Scholarship and Standards Committee;
 2. perform all the duties of the office of the International President in the absence, incapacitation, or at the request of the International President;
 3. oversee the establishment of chapters
 4. coordinate the leadership transition meetings for both Grand Chapter and Regional Leadership
 5. orient and provide ongoing training for Regional Directors and Regional Representatives
 6. assist with development and implementation of reclamation

Section 3. NATIONAL SECOND VICE PRESIDENT

- A. It shall be the duty of the National Second Vice President to:
 1. work with officers and chapters in stimulating and strengthening collegiate participation in the life of the Sorority;
 2. serve as liaison between collegiate and alumnae chapters to strengthen relationships and understanding;
 3. serve as a member of the National Scholarship and Standards Committee; and
 4. perform all the duties of the office of the International President in the absence, or at the request, of the International President.

Section 4. NATIONAL SECRETARY

- A. The National Secretary is the Corporate Secretary of Delta Sigma Theta Sorority, Incorporated and shall be responsible for the execution of duties typically associated with a corporate secretary. The National Secretary shall have charge of all Board records, the Sorority's official documents, and the seal of the Sorority.

All minutes and other records of the Board and of its Committees and Commissions, shall remain the property of the Sorority. The National Secretary shall be responsible for maintaining the confidentiality and security of such minutes and records and for reporting any breaches thereof to the Chair of the Board and the General Counsel-Chief Compliance Officer.

The National Secretary shall authenticate the actions of the Board before and with third parties, and deliver, as appropriate attestations of such actions of the Board as may be necessary to carry on the business of the Sorority or to give effect to the actions of the Board and Grand Chapter.

The National Secretary shall oversee and ensure the implementation, maintenance, accuracy and updating of the Sorority's policy management system.

- B. The National Secretary shall:
1. prepare the agenda of all Board meetings at the direction of the International President and Chair of the National Board of Directors;
 2. prepare the minutes of the National Board of Directors and Executive Committee meetings;
 3. ensure a copy of the minutes of each meeting of the Board is forwarded to its members and certify the same as a true copy when necessary;

4. send notices of the National Board and Committee meetings to the members of the Board;
5. maintain a central calendar for meetings, major events and other activities;
6. perform related duties assigned to the National Secretary by the Chair of the Board;
7. certify actions of the National Board of Directors and Grand Chapter;
8. affix the seal of the Sorority;
9. authenticate the records of the sessions of the National Convention not later than 180 days from the receipt of said Convention transcript; and
10. provide a finalized report of the proceedings and actions from the National Board of Directors meetings to each member within 30 days of ratification by the National Board of Directors

Section 5. NATIONAL TREASURER

- A. The National Treasurer shall possess one or more of the following credentials: Certified Public Accountant (CPA), Certified Internal Auditor (CIA), Certified Management Accountant (CMA), Certified Financial Planner (CFP), Chartered Financial Analysts (CFA) OR she has earned one of the following degrees: Master of Business Administration (MBA), Graduate degree or an undergraduate degree in finance, accounting or economics; OR five years current experience in the following industries: finance, budgeting, accounting, auditing, internal controls, and or asset management. The National Treasurer shall also have demonstrated experience having served as a Chief Financial Officer (CFO) or as a member of a board finance committee for a comparable for-profit or non-profit organization.
- B. The National Treasurer shall:
 1. serve as a voting member of the National Finance Committee which reviews and recommends financial policy;

2. receive and review the report of the CFO on monthly financial records and reconciliation reports of Grand Chapter monies;
3. present a quarterly financial report to the National Board of Directors and the chapters;
4. present a semi-annual financial report of all Grand Chapter monies to the National Board of Directors and advise the Board of the financial status of the Sorority;
5. ensure that the internal controls are adhered to and the financial policies are implemented;
6. present annually an audited financial report to the Grand Chapter;
7. advise and counsel the National Board of Directors;
8. advise the Board on strategies to stimulate economic growth and financial stability of the Grand Chapter and chapters in consultation with the International President and relevant committees and headquarters staff;
9. ensure all fiscal information on Grand Chapter is compiled and disseminated to chapters to include such information as bonding, insurance and investment; and
10. ensure fines levied on chapters and individuals as a result of disciplinary measures are collected.

Section 6. OTHER NATIONAL OFFICERS

- A. The International President shall appoint a Legal Advisor who shall possess the requisite experience and credentials. The Legal Advisor shall exercise such duties as associated with these positions.
- B. The International President shall appoint a National Chaplain who shall possess the requisite experience and credentials. The National Chaplain shall exercise such duties as associated with these positions.

Such other national officers as may be authorized by the Grand Chapter *Constitution and Bylaws* shall exercise such duties as customarily pertain to such offices unless otherwise specified.

Section 7. REGIONAL DIRECTORS

- A. Regional Directors must attend annual training sessions to become knowledgeable on policies, procedures, and programs of the Sorority.
- B. It shall be the duty of the Regional Director to:
 - 1. enforce the *Constitution and Bylaws*, the Operating Agreement, the Code of Conduct, policies and procedures, and other governing documents of the Sorority within her Region;
 - 2. stimulate growth and development in the region, encourage the chapters in the achievement of national program goals, and provide regional correspondence and communications with chapters in the region through e-mail, letters, newsletters or other appropriate means;
 - 3. assist and advise the chapters in the region;
 - 4. approve, assist, monitor or remove chapter advisor(s) as warranted and prescribed in ARTICLE III - CHAPTERS, Section 1. ESTABLISHMENT AND MAINTENANCE, B. Collegiate Chapter Advisors;
 - 5. investigate applications for the establishment of new chapters and such pre-initiation of collegiate groups as may be necessary prior to the establishment of chapters, make recommendations regarding the same to the National Scholarship and Standards Committee, and perform the ceremonies related to the establishment of new chapters. International Charter requests will be directed to the National First Vice President and the Regional designation determined by the International President;

6. review all required documentation, investigate any alleged violations, and approve the chapter's compliance with the Membership Intake Program of the Sorority;
7. report to the National Board of Directors and the Regional Conference, in conjunction with the Regional Representative, on the activities of the office;
8. serve as presiding officer at meetings of the Regional Conference;
9. appoint a Regional Secretary, Regional Journalist, and Regional Program Coordinator. In addition, the Regional Director, in consultation with the Regional Representative, shall appoint State or Country Coordinator(s) for each state, including the District of Columbia and international country in the region within 60 days following her election, to serve for the biennium;
10. appoint a Sergeant(s)-at-Arms, Parliamentarian(s), Chaplain(s), Timekeeper(s), committees, and others in accordance with the Regional Conference Planning Guide, to serve at the time of the Regional Conference;
11. submit reports to the National Scholarship and Standards Committee as requested.

Section 8. REGIONAL REPRESENTATIVES

A. It shall be the duty of the Regional Representative to:

1. assist the Regional Director with duties as assigned;
2. appoint a State Facilitator(s) or Country Facilitator(s), in consultation with the Regional Director, for each state, including the District of Columbia and each international country in the region within 60 days following her election, to serve for the biennium;
3. participate in the decision making on all disciplinary actions;
4. stimulate growth and development in the region, encourage the chapters in the achievement of national program goals, and carry on regional correspondence and communications

- with chapters in the region through letters, newsletters or other appropriate means;
5. assist and confer with the National Second Vice President in strengthening the life of the Sorority;
 6. submit reports to the National Scholarship and Standards Committee as requested; and
 7. serve as the Regional Social Action Co-Coordinator.

ARTICLE VI – NATIONAL BOARD OF DIRECTORS

Section 1. MEMBERS

The National Board of Directors shall consist of the elected National Officers of the Grand Chapter, the elected Regional Officers, Chairs of elected Standing Committees and International President recommended and Board elected Standing Committees and Commissions as delineated in ARTICLE VII, Sections 1 and 2, and the Immediate Past National President.

Section 2. MEETINGS

The National Board of Directors shall meet semi-annually and at the call of the International President.

Section 3. DUTIES

- A. It shall be the duty of the National Board of Directors to:
 1. act on the mandates of the Grand Chapter presented at the National Convention;
 2. act for the Grand Chapter in the interim between National Conventions;
 3. develop, implement and report to Grand Chapter a five-year, long-range plan and recommend the priorities for the Sorority's biennium;

4. approve all policies of the Sorority upon recommendation of the respective committee, commission, Executive Director, and upon concurrence of the International President;
5. appoint and terminate the Executive Director, upon the recommendation of the Executive Committee;
6. ensure the establishment of goals for Headquarters operations and oversee the execution of performance management by the Executive Committee;
7. serve as the second level appellate body subsequent to action by the National Scholarship and Standards committee appeals from chapters and individual members.

Section 4. VOTING

- A. Each National Officer, Regional Officer, and the Immediate Past President shall be allotted one vote;
- B. Each National Standing Committee and Commission established pursuant to an act of Grand Chapter, as delineated in ARTICLE VII, Section 1 and Section 2, shall be allotted one vote per committee and commission.

Section 5. NATIONAL EXECUTIVE COMMITTEE

- A. The National Executive Committee of the National Board of Directors shall consist of the:

International President
National First Vice President
National Second Vice President
National Secretary
National Treasurer

- B. The National Executive Committee shall meet quarterly and at the call of the International President. The Committee acts on

behalf of the Board to facilitate decision-making between Board meetings or in urgent or crisis circumstances. The Executive Committee may not incur indebtedness; acquire, pledge, or dispose of Sorority assets; elect or remove Board members; approve or amend the budget; or direct headquarters reorganization.

The Committee also acts as the Board's link to the Executive Director, performs the Executive Director's performance evaluation, and provides administrative direction to headquarters' operations. The Committee, under the leadership of the International President also facilitates action on the Grand Chapter's programs, policies, and administrative matters in the interim of the National Board of Directors meetings.

- C. The National Executive Committee does not supersede the National Board of Directors and the Committee decisions of a material nature shall be subject to ratification by the National Board of Directors not later than its next scheduled meeting.

Section 6. REMOVAL OF BOARD MEMBER

Pursuant to the recommendation of the International President, as a fiduciary of Grand Chapter, any Director may be removed by a majority vote of the Board, a quorum being present, at any meeting of the Board, upon certification by the Executive Committee that:

The Director proposed to be removed has acted in a way that: is either an actual or apparent violation of the Statement of Responsibilities of the Board; is inconsistent with the fiduciary role of a director; failed to timely submit required filings or has otherwise acted in a way to bring discredit to the Sorority or Board; or has been determined by the National Scholarship and Standards Committee to have violated the Code of Conduct.

Section 7. RECORDS MANAGEMENT

Confidential Records – Unless approved by the Board, minutes and other records of the Board, and of the Committees and Commissions are confidential. The General Counsel-Chief Compliance Officer, Chief Financial Officer, and independent auditors may have access to such minutes and records to the extent needed to conduct audits or reviews, or to otherwise comply with generally accepted accounting principles, legal imperatives, or such government requirements as may be applicable.

ARTICLE VII – NATIONAL STANDING COMMITTEES, COMMISSIONS, AND REGIONAL COMMITTEES

NATIONAL STANDING COMMITTEES

Elected Committees

Finance

Scholarship and Standards

Nominating

Audit and Corporate Compliance

Board Elected Chair and Appointed Committee Members

Communications and Public Relations

Constitution and Bylaws

Distinguished Professor Endowed Chair

Documents Review and Management

Heritage and Archives

Housing and Properties

Human Resources

Institutional Research

Leadership Academy

Membership Services

Program Planning and Development

Protocol and Traditions

Strategic Partnership
Strategic Planning
Technology

Board Elected Chair and Appointed Commission Members

Arts and Letters
Ritual and Ceremonies
Social Action

Other such committees approved by the voting delegates at the National Convention, shall be the standing committees of the Grand Chapter.

Section 1. Elected Committees

A. Finance Committee

1. In fulfillment of the Board's fiduciary responsibilities, the Finance Committee is responsible for broad financial and investment oversight. The Board has the ultimate authority and accountability for financial oversight of the Sorority. In concert with advisors, the Committee shall assist the Board in discharging fiduciary responsibilities relative to the oversight of all corporate financial, investment and retirement financing matters. In fulfillment of these responsibilities the Committee shall take into account the operating conditions outlook for the Sorority, the need to liquidate, safety of principal and reasonable current income. The Committee shall recommend for approval of the Board and assess the implementation of policies associated with finance.
2. The Finance Committee shall consist of ten members: the National Treasurer; a Chair; one member from each of the seven regions; and one collegiate member in accordance with ARTICLE IX – ELECTIONS AND VOTING, Section

- 1, NATIONAL CONVENTIONS. The members of the Finance Committee must meet the following criteria: Alumnae Members must have earned one of the following designations: Certified Public Accountant (CPA), Certified Internal Auditor (CIA), Certified Management Accountant (CMA), Certified Financial Planner (CFP), Chartered Financial Analyst (CFA) OR earned one of the following degrees: Master of Business Administration (MBA), graduate degree or an undergraduate degree in finance, accounting or economics; OR five years of current experience in the following industries: finance, budgeting, accounting, auditing, internal controls, and or asset management and has served as a fiscal officer of a local chapter or member of the National Finance Committee. The collegiate member must hold a major in accounting, finance, business administration, or any other related subject area in the list of majors.
3. The chair of the Finance Committee shall have demonstrated experience having served as Chief Financial Officer (CFO) or as a member of a board finance committee for a comparable for-profit or nonprofit organization.

B. Scholarship and Standards Committee

1. In fulfillment of the Board's fiduciary responsibilities, the Scholarship and Standards Committee shall administer and enforce policies and procedures, which includes the Sorority's scholarships program; the Code of Conduct; and the membership intake and chapter charter process. The Committee shall also oversee and manage the transition, onboarding, and training of Regional Officers. With regard to the Code of Conduct, the Committee shall utilize trained investigators to investigate alleged misconduct and improprieties, and adjudicate disputes by and among Chapter committees, officers, and individual members. The Committee shall administer and oversee policies and

procedures that prescribe compliance by Chapters and members. The Committee also serves as an appellate body to review disciplinary actions by Regional Directors. The Committee shall recommend for approval of the Board and assess the implementation of policies associated with scholarship and standards.

2. The Scholarship and Standards Committee shall consist of ten members: the National First Vice President, who shall serve as the Chair; the National Second Vice President; and eight other members in accordance with ARTICLE IX - ELECTIONS AND VOTING, Section 1. NATIONAL CONVENTIONS and Section 2. REGIONAL CONFERENCES. One member shall be elected in each of the seven regions to serve for four years, and one collegiate member shall be elected by the National Convention to serve for two years.

C. Nominating Committee

1. In fulfillment of the Board's fiduciary responsibilities, the Nominating Committee shall plan, administer, and assess the process to facilitate the election of the Sorority's national and regional officers and elected committees. The Committee shall develop and implement a process of announcing, identifying, recruiting, screening, defining qualifications in consultation with the National Board of Directors, and selecting candidates, and recommend all associated nomination and election policy, rules and procedures for the approval of the Board. The Committee shall assess the implementation of policies associated with the nominations process. The committee routinely reports to the Board and presents the slate of candidates to Grand Chapter.
2. The Nominating Committee shall consist of nine members: one elected member from each region; one elected collegiate member; and an elected Chair. All members shall be elected in accordance with ARTICLE VI - NATIONAL BOARD OF

DIRECTORS, Section 3. DUTIES and ARTICLE IX – ELECTIONS AND VOTING of these Bylaws.

D. Audit and Corporate Compliance Committee

1. In fulfillment of the Board's fiduciary responsibilities, the Audit and Corporate Compliance Committee shall assist the Board in discharging oversight responsibilities relating to: independence of members of the Committee; the adequacy and integrity of the accounting, reporting, auditing and financial practices and controls of the Sorority; the Sorority's compliance with legal and regulatory requirements; the independent accountants qualifications and independence, appointment and retention; the performance of the Sorority's independent accountants and internal auditors; and the oversight of the Sorority's corporate compliance and ethics program. The Committee shall report to the Board. The Committee shall recommend for approval of the Board, oversee and assess the implementation of policies associated with audit and corporate compliance enterprise risk. The committee shall report to the Board.
2. The Audit and Corporate Compliance Committee shall consist of eight elected members: the Chair; five alumnae members and two collegiate members, in accordance with ARTICLE IX – ELECTIONS AND VOTING, Section 1, NATIONAL CONVENTIONS. The members of the Audit and Corporate Compliance Committee must meet the following criteria: Alumnae Members who have earned one of the following designations: Certified Public Accountant (CPA), Certified Internal Auditor (CIA), Certified Management Accountant (CMA), Chartered Financial Analyst (CFA), Certified Information Systems Auditor (CISA), Certified Compliance and Ethics Professional (CCEP), Certified Regulatory Compliance Manager (CRCM), Chartered Global Management Accountant

(CGMA) OR Doctorate, Masters, or Bachelors in one of the following areas: accounting, finance, business administration or any other related major, OR possess five years of current experience in auditing, internal controls or finance. The collegiate member must hold a major in accounting, finance, business administration, or any other related subject area in the list of majors.

3. The Audit and Compliance Committee chair shall have demonstrated experience of having served as an audit committee member of a comparable for-profit or nonprofit organization. Members of the Committee shall include Sorors with demonstrated experience in corporate compliance, legal and regulatory requirements and enterprise risk management; the adequacy and integrity of accounting, reporting, and auditing; and financial practices and controls of a comparable for-profit or nonprofit organization.

Section 2. BOARD ELECTED COMMITTEE CHAIR AND APPOINTED COMMITTEE MEMBERS

A. Communications and Public Relations Committee

1. In fulfillment of the Board's fiduciary responsibility, the Communications and Public Relations Committee shall promote the Sorority's mission, vision, values and activities including: programs, membership, volunteerism, events, and public policy and social change advocacy agenda. The Committee shall also oversee the development, assessment and implementation of the Sorority's strategic communication and marketing plans. The plans shall expand the Sorority's presence and influence, as well as enhance its image and credibility internally and externally. The Committee shall recommend for approval of the Board, oversee and assess policies associated with communications and public relations. The committee shall report to the Board.

2. The Communications and Public Relations Committee shall consist of members appointed by the International President. The Chair shall be elected by the Board upon the recommendation of the International President.
- B. Constitution and Bylaws Committee
1. In fulfillment of the Board's fiduciary responsibility, the *Constitution and Bylaws* Committee shall steward the Sorority's *Constitution and Bylaws*, which includes educating members on the Constitution and Bylaws, interpreting and reviewing proposed amendments and presenting such amendments to the Grand Chapter. The Committee shall periodically review and assess the *Constitution and Bylaws* pursuant to a best practice standard and recommend revisions as appropriate for consideration by Grand Chapter. The Committee shall report to the Board and recommend for the consideration of the Board policies associated with the *Constitution and Bylaws*.
 2. The Constitution and Bylaws Committee shall consist of members appointed by the International President. The Chair shall be elected by the Board upon the recommendation of the International President.
- C. Distinguished Professor Endowed Chair (DPEC) Committee
1. In fulfillment of the Board's fiduciary responsibilities the Distinguished Professor Endowed Chair Committee shall oversee the implementation of the Sorority's initiative to provide financial resources for faculty-led research of distinction at Historically Black Colleges and Universities (HBCU). The Committee shall also recommend for approval of the Board, oversee and assess the implementation of policies associated with the Distinguished Professor Endowed Chair. The committee shall report to the Board.
 2. The Distinguished Professor Endowed Chair Committee shall consist of members appointed by the International

President. The Chair shall be elected by the Board upon the recommendation of the International President.

D. Documents Review and Management Committee

1. In fulfillment of the Board's fiduciary responsibilities, the Documents Review and Management Committee shall oversee, review, and maintain the Sorority's document management system. The Committee shall also recommend for approval of the Board, the establishment of standards and protocols for the approved use of all Delta documents primarily used by the membership. The Committee shall also recommend for approval of the Board, oversee and assess the implementation of policies associated with document management. The committee shall report to the Board.
2. The Documents Review and Management Committee shall consist of members appointed by the International President. The Chair shall be elected by the Board upon the recommendation of the International President.

E. Heritage and Archives Committee

1. In fulfillment of the Board's fiduciary responsibilities the Heritage and Archives Committee shall ensure that the Sorority's history is documented, collected, maintained and shared in alignment with professional archival standards as promulgated by the Society of American Archivists. The Committee shall also recommend for approval of the Board, oversee and assess the implementation of policies associated with heritage and archives. The committee shall report to the Board.
2. The Heritage and Archives Committee shall consist of members appointed by the International President. The Chair shall be elected by the Board upon the recommendation of the International President.

F. Housing and Properties Committee

1. In fulfillment of the Board's fiduciary responsibilities the Housing and Properties Committee shall serve as an expert advisor and provide professional guidance to the Sorority. The Committee shall seek to inform the Sorority's real estate strategy and plans, mitigate risk, increase value and maintain safety in the Sorority's properties and that of its affiliates. The Committee shall also oversee and document chapter-foundation relationships relative to real estate ownership. The Committee shall recommend for approval of the Board, oversee and assess the implementation of policies associated with housing and properties and chapter-foundation relations. The committee shall report to the Board.
2. The Housing and Properties Committee shall consist of members appointed by the International President. The Chair shall be elected by the Board upon the recommendation of the International President.

G. Human Resources Committee

1. In fulfillment of the Board's fiduciary responsibilities, the Human Resources Committee shall promote, monitor, review, and make recommendations to the Board concerning the Sorority's effort to be a "best place to work" employer. The Committee assists the Board to fulfill its obligations as an employer overseeing the Sorority's compensation, human resources, and organizational development policies and practices as well as advise on major aspects of workforce planning, strategy, and investment to ensure workforce configuration and culture are optimally suited to the strategic needs of the Sorority, and reflect the Sorority's values of equity, diversity, and inclusion. The Committee shall recommend, oversee and assess the implementation of policies associated with Human Resources. The committee shall report to the Board.

2. The Human Resources Committee shall consist of members appointed by the International President. The Chair shall be elected by the Board upon the recommendation of the International President.
- H. Institutional Research Committee
1. In fulfillment of the Board's fiduciary responsibility, the Institutional Research Committee shall oversee the collection, analysis, interpretation, reporting and dissemination of data and information to advise and inform the Sorority's strategy, planning, program and policy formula and plans, evaluation processes, educational needs of information producers, users and consumers and steward the Sorority's data and information. The Committee shall recommend for approval of the Board, oversee and assess the implementation of policies associated with institutional research. The committee shall report to the Board
 2. The Institutional Research Committee shall consist of members appointed by the International President. The Chair shall be elected by the Board upon the recommendation of the International President.
- I. Leadership Academy
1. In fulfillment of the Board's fiduciary responsibilities, the Leadership Academy Committee shall oversee the implementation and assess the effectiveness of the Sorority's initiative to establish and maintain a leadership talent pipeline. The Committee shall set a best-in-class standard in the development of programs, initiatives and trainings that promote enhanced decision-making, team building, increase retention and heighten engagement for the ongoing, voluntary, and self-motivated pursuit of knowledge and leadership skills for Sorors. The Committee shall also recommend for approval of the Board, oversee and assess

the implementation of policies associated with the Leadership Academy. The committee shall report to the Board.

2. The Leadership Academy Committee shall consist of members appointed by the International President. The Chair shall be elected by the Board upon the recommendation of the International President.

J. Membership Services Committee

1. In fulfillment of the Board's fiduciary responsibilities, the Membership Services Committee shall oversee the design and implementation of best-in-class member organizations service programs. In fulfillment of these responsibilities, the Committee shall deploy every possible resource and data to inform member service strategies designed to increase and enhance member engagement, retention and satisfaction. The Committee shall also recommend for approval of the Board, oversee and assess the implementation of policies associated with membership services. The committee shall report to the Board.
2. The Membership Services Committee shall consist of members appointed by the International President. The Chair shall be elected by the Board upon the recommendation of the International President.

K. Program Planning and Development Committee

1. In fulfillment of the Board's fiduciary responsibilities, the Program Planning and Development Committee shall oversee the development, evaluation and implementation of best-in-class Sorority domestic and international program initiatives which are measurably impactful. The Committee shall utilize the Sorority's Five Point Programmatic Thrust as the framework for the Committee's strategic goals and objectives. The Committee shall also recommend for approval of the Board, oversee and assess the implementation

- of policies associated with program, planning and development. The committee shall report to the Board.
2. The Program, Planning and Development Committee shall consist of members appointed by the International President. The Chair shall be elected by the Board upon the recommendation of the International President.

L. Protocol and Traditions Committee

1. In fulfillment of the Board's fiduciary responsibilities, the Protocol and Traditions Committee shall designate and promulgate rules, customs, structure and standards that codify the behaviors and arrangements which ensure the perpetuation of reverence and decorum in all Sorority ceremonies. The Committee shall also recommend for approval of the Board, oversee and assess the implementation of policies associated with protocol and traditions. The committee shall report to the Board.
2. The Protocol and Traditions Committee shall consist of members appointed by the International President. The Chair shall be elected by the Board upon the recommendation of the International President.

M. Strategic Partnership Committee

1. In fulfillment of the Board's fiduciary responsibilities, the Strategic Partnership Committee shall oversee the engagement with the Sorority's charitable and corporate partners and sponsors by creating and maintaining relationships to continue the legacy of global service that empowers our communities. The Committee shall utilize the Sorority's Five Point Programmatic Thrust to advance the Sorority's comprehensive initiatives, advocacy, and programs on the local, state, and national level with the support of strategic public and private partnerships. The committee shall report to the Board.

2. The Strategic Partnership Committee shall consist of members appointed by the International President. The Chair shall be elected by the Board upon the recommendation of the International President.

N. Strategic Planning Committee

1. In fulfillment of the Board's fiduciary responsibilities, the Strategic Planning Committee shall propose and oversee the preparation, review, and update of the Sorority's Five-Year Strategic Plan (the "Strategic Plan"). In concert with the National Executive Committee, the Committee shall submit the Strategic Plan for approval of the Board. The National Strategic Planning Committee shall monitor and annually assess and report on progress toward implementation of the Strategic Plan. The Committee shall recommend for approval of the Board, oversee and assess the implementation of policies associated with strategic planning. The committee shall report to the Board.
2. The Strategic Planning Committee shall consist of members appointed by the International President. The Chair shall be elected by the Board upon the recommendation of the International President.

O. Technology Committee

1. In fulfillment of the Board's fiduciary responsibilities, the Technology Committee shall provide expert advice to support the Sorority's objective to deploy best-in-class technology solutions in the efficient, effective and strategic implementation of Grand Chapter programs and initiatives. The Committee shall oversee the development of a five-year comprehensive technology plan (the "Plan"), collaborate with the National Finance Committee in development of a corresponding five-year capital budget and in concert with the National Executive Committee, recommend for approval by the Board. The National Technology Committee shall

- monitor and annually assess and report on progress toward implementation of the Plan. The Committee shall also recommend for approval of the Board, oversee and assess the implementation of policies associated with technology. The committee shall report to the Board.
2. The Technology Committee shall consist of members appointed by the International President. The Chair shall be elected by the Board upon the recommendation of the International President.

Section 3. BOARD ELECTED COMMISSION CHAIR and APPOINTED COMMISSION MEMBERS

A. Arts and Letters Commission

1. In fulfillment of the Board's fiduciary responsibilities, the Arts and Letters Commission shall stimulate interest and educate chapters in the areas of arts and letters. The Commission shall recommend and oversee the development and coordination of arts and letters programs and projects. The Commission shall also recommend for approval of the Board, oversee and assess the implementation of policies associated with arts and letters. The commission shall report to the Board.
2. The Arts and Letters Commission shall consist of members appointed by the International President. The Co-Chairs shall be elected by the Board upon the recommendation of the International President.

B. Ritual and Ceremonies Commission

1. In fulfillment of the Board's fiduciary responsibilities, the Ritual and Ceremonies Commission shall review the Sorority's ceremonies and ritual activities and recommend revisions as appropriate for consideration by the Board. The Commission shall present such Board-approved revisions to the membership. The Commission shall stimulate interest and

educate local chapter members regarding Ritual and Ceremonies procedures. The Commission shall recommend for Board approval, oversee and assess the implementation of policies associated with ritual and ceremonies. The commission shall report to the Board.

2. The Ritual and Ceremonies Commission shall consist of Past National President(s), alumnae, and collegiate members appointed by the International President. The Co-Chairs shall be elected by the Board upon the recommendation of the International President.

C. Social Action Commission

1. In fulfillment of the Board's fiduciary responsibilities, the Social Action Commission shall promote, monitor, review, and recommend the Sorority's domestic and international agenda on public policy, legislation, resolutions, advocacy, and demonstrative representation. The Commission shall support the Sorority in the formulation, publication and communication of positions, strategies and activities to actualize the vision of the Founders of the Sorority, honor civic engagement and participate in social change in perpetuity. The Commission shall facilitate the resolutions process by receiving, reviewing and recommending to the Board and the Grand Chapter those resolutions which holistically represent Delta's public stance on domestic and international issues. The commission shall report to the Board.
2. The Commission shall recommend for the consideration of the Board policies associated with social action. The Social Action Commission shall consist of members appointed by the International President. The Co-Chairs shall be elected by the Board upon the recommendation of the International President.

Section 4. NATIONAL CONVENTION COMMITTEES

A. Credentials Committee

1. The Credentials Committee shall consist of members and a chair appointed by the International President.
2. It shall be the duty of the Credentials Committee to:
 - a) report to the Grand Chapter during the National Convention the number of voting, alternate and non-voting delegates and other categories of persons attending the National Convention; and
 - b) adjudicate, with the International President and the National Secretary, any discrepancies concerning the credentials of delegates.

B. National Convention Planning Committee

1. The National Convention Planning Committee shall consist of members and a coordinator appointed by the International President
2. It shall be the duty of the National Convention Planning Committee to recommend to the National Board of Directors the broad outlines and objectives, and general program considerations for the National Convention. The coordination of the National Convention is then the responsibility of the International President, the National Board of Directors, the National Finance Committee, and the National Headquarters staff.

Section 5. REGIONAL NOMINATING COMMITTEE

- A. The Regional Nominating Committee shall consist of four members and a chair elected in each region.
- B. It shall be the duty of the Regional Nominating Committee to:
 1. solicit and receive nominations from chapters and members of persons to serve in elected regional offices and on committees;

2. select, for consideration of the Regional Conference, candidates for election to regional elected offices and committees;
3. distribute to the chapters, by April 1 prior to the Regional Conference, the names of candidates to be presented to the Regional Conference;
4. report the names of candidates to the Regional Conference at a session prior to the final session; and
5. consult with the National Nominating Committee Chair.

Section 6. APPOINTMENT OF NATIONAL COMMITTEES AND NATIONAL COMMISSIONS

- A. The International President shall appoint all national committees and national commissions not otherwise provided by the *Constitution and Bylaws*, and such other national committees and national commissions as may be deemed necessary, from members who are financial with a chapter and the Grand Chapter or financial only with the Grand Chapter through the member-at-large status.
- B. The continuity of each appointed national committee and national commission shall be provided by retention of no more than one-fourth of the membership every six years.
- C. The board-elected national chair must have attended at least two of the last three National Conventions and two of the last three Regional Conferences, except where the board-elected chair is a collegiate member.

ARTICLE VIII – NATIONAL HEADQUARTERS AND NATIONAL HEADQUARTERS STAFF

Section 1. NATIONAL HEADQUARTERS

The Sorority shall operate a National Headquarters for the purpose of facilitating its day-to-day business activities; implementation of programs

and initiatives; and strategic and operational support to the National Board of Directors and the National Committees and Commissions.

Section 2. NATIONAL HEADQUARTERS STAFF

The day-to-day operations of the National Headquarters shall be under the direction of a National Headquarters Staff headed by an Executive Director.

- A. The Executive Director is accountable to the National Board of Directors, reports to the International President, and is subject to the general direction of the Executive Committee and provides leadership and manages the operation of headquarters staff to ensure appropriate support to all Sorority programs, services, and initiatives as authorized by the Board of Directors or Grand Chapter.
- B. The Executive Director is responsible for managing the headquarters staff and overseeing the administration of the Sorority's business operations, support to the Sorority's programs, initiatives and work of the Board and national committees / commissions and taskforces. It shall be her duty to:
 - 1. advance the mission of the Sorority;
 - 2. implement the National Board of Directors policy and strategic directions and support corporate governance;
 - 3. supervise and collaborate with headquarters staff;
 - 4. support implementation of the Strategic Plan;
 - 5. oversee, coordinate and facilitate the finance department's support of the development and execution of the annual operating and capital budgets;
 - 6. establish and maintain relationships with various organizations, at the direction of the International President, and utilize those relationships to strategically enhance the Sorority's Mission;
 - 7. support fundraising and development initiatives;

8. support the work of the Board and committee meetings;
9. implement employment, operational, strategic and administrative policies and procedures for all functions and the day-to-day operation of Headquarters;
10. execute Sorority documents and instruments consistent with Board granted authority; and
11. execute other duties as directed by the Executive Committee and assigned by the International President.

ARTICLE IX – ELECTIONS AND VOTING

Section 1. NATIONAL CONVENTIONS

The following shall be elected by a majority of the voting delegates seated and voting in National Convention.

- A. National Officers
 1. International President and Chair of the National Board of Directors
 2. National First Vice President
 3. National Second Vice President
 4. National Secretary
 5. National Treasurer
- B. National Committee Chairs
 1. Nominating Committee
 2. Finance Committee
 3. Audit and Corporate Compliance Committee
- C. Finance Committee
 1. During alternate National Conventions, a chair shall be elected and shall serve for four years.
 2. One alumnae member shall be elected in each region and shall serve four years.

3. One collegiate member shall be elected at each National Convention and shall serve for two years.
 4. The chair and members shall not be eligible for re-election to the same position on the committee.
- D. Scholarship and Standards Committee
1. One alumnae member shall be elected in each region and shall serve four years.
 2. One collegiate member shall be elected at each National Convention and shall serve for two years.
- E. Nominating Committee
1. The chair shall be elected at the National Convention preceding the National Convention at which she will serve and shall serve for two years.
 2. One alumnae member shall be elected in each region and shall serve for two years.
 3. One collegiate member shall be elected at each National Convention and shall serve for two years.
 4. The chair and members of the committee shall serve one term.
- F. Audit and Corporate Compliance Committee
1. During alternate National Conventions, the chair of the committee shall be elected and shall serve for four years.
 2. During the National Convention, alternating with the convention referenced in C. 1 above, two alumnae members shall be elected and serve for four years. The chair and members shall not be eligible for re-election to the same position on the committee.
 3. Two collegiate members shall be elected at each National Convention and shall serve for two years.

Section 2. REGIONAL CONFERENCES

The following shall be elected by a majority of the voting delegates seated and voting in Regional Conference.

A. Regional Officers

1. A Regional Director and a Regional Representative shall be elected in each region.
2. The Regional Officers shall assume duties immediately following their installation.
3. Notice of the election results shall be given to the National Secretary.

B. National Committee Members

1. One member of the National Nominating Committee shall be elected in each region and shall serve two years.
2. One member of the National Scholarship and Standards Committee shall be elected in each region to serve a term of four years and shall not be eligible for re-election to the same position on the committee.
3. One member of the National Finance Committee shall be elected in each region to serve a term of four years and shall not be eligible for re-election to the same position on the committee.

C. Regional Nominating Committee

1. A chair shall be elected in each region and shall serve two years.
2. Four members shall be elected in each region and shall serve two years. One of the committee members shall be a collegiate.
3. The chair and members of the Regional Nominating Committee shall serve one term.

D. Residency Requirement

All members elected by regional ballot shall reside in the region

by which they were elected during the tenure of their position. Cessation of such residence shall automatically create a vacancy in the position, except when the elected member is a collegiate who fulfilled the requirements upon election.

Section 3. CHAPTER ELECTIONS

A. Chapter Officers/Positions

In accordance with chapter policies and procedures, each chapter shall elect the officers/positions below, as well as other officers/positions deemed necessary:

Officers

President

Vice President

Secretary

Treasurer

Positions

Chair, Nominating Committee

Nominating Committee Members

Chair, Internal Audit Committee

- B. A candidate for chapter office or position shall be financial with the chapter and Grand Chapter for the fiscal year in which the election takes place. If elected, the officer, chair or committee member shall maintain financial status during her term(s) of office.
- C. Time of Elections
1. Each chapter shall hold election of officers in April or May annually or biennially; said officers assume office on July 1st. Collegiate officers assume office immediately upon installation and alumnae officers on July 1st.
 2. The Regional Director may, upon request and where circumstances warrant, authorize the holding of an election at another time.

3. The chair and members of the Nominating Committee shall be elected annually or biennially and serve one term.
- D. Each chapter shall submit to National Headquarters the names, offices held and addresses of the officers elected by June 30 on an annual basis.

Section 4. METHODS OF VOTING

- A. Voting for officers, elected committee chairs and committee members at National Conventions and Regional Conferences shall be by ballot, machine or electronic voting.
- B. Voting for Chapter Officers
Voting for Chapter Officers, elected committee chairs, and committee members and acceptance to membership shall be by ballot, machine or electronic voting.

Section 5. VOTING

- A. Voting at National Convention and Regional Conference shall be on the basis of one vote for each chapter seated.
- B. When there are two or more candidates (and the office remains unfilled after the first ballot), the two candidates who receive the highest number of votes will remain eligible for election. All other candidates will be dropped and are ineligible for election. All subsequent votes cast for ineligible candidates shall be treated as an illegal vote.
- C. Write-in candidates are prohibited, and provisions for write-in candidates shall not be included on the ballot.
- D. Chapter Voting
 1. Only members of the chapter shall vote or hold office.
 2. Each chapter shall give prior written notice of at least ten (10) days for the election of officers, elected committee

chairs and members; voting whether to proceed or not to proceed with the membership intake process, and voting on the acceptance of candidates for membership into the Sorority. Written notice to include email, USPS, or other appropriate forms of communication deemed acceptable by the Regional Director.

3. Voting on whether to proceed or not to proceed with the membership intake process shall be by a two-thirds (2/3) vote.
4. The acceptance to membership and the election of chapter officers, elected committee chairs and members shall be by a majority vote of the chapter members present and voting.
5. Write-in candidates are prohibited and provisions for write-in candidates shall not be included on the ballot.

Section 6. INSTALLATIONS

A. National Convention

National officers, committee chairs and committee members shall be installed by the designee of the incoming International President or by the National Parliamentarian at the last session of the National Convention.

B. Regional Conference

The Regional Director, Regional Representative, member of the National Nominating Committee, member of the National Scholarship and Standards Committee, and the chair and members of the Regional Nominating Committee shall be installed by the International President or her designee at the last session of the Regional Conference.

Section 7. TERM OF OFFICE

- A. Officers elected at a National Convention shall serve until the newly elected officers are installed at the next National Convention, unless the term of office is otherwise specified.
- B. Regional Directors, Regional Representatives, National Nominating Committee members, and the chairs and members of the Regional Nominating Committees elected at a Regional Conference shall serve until the newly elected officers are installed at the next Regional Conference.
- C. Members of the National Scholarship and Standards Committee elected at Regional Conference shall serve a term of four years.
- D. The chair of the National Finance Committee elected at a National Convention shall serve a term of four years.
- E. The chairs and members of the National, Regional and Chapter Nominating Committees shall serve one term.

Section 8. LIMITATION OF OFFICE

A member shall hold only one position, either elected or appointed on any level -- Regional or National -- at the same time, except in cases where one's position has additional duties or in extenuating circumstances. For example, on the National level, the National First Vice President also serves as the chair of the National Scholarship and Standards Committee. Where feasible, chapters may follow the same procedure.

Section 9. LIMITATION OF TENURE

- A. Elected national, regional and chapter officers shall not serve more than two consecutive terms in the same office.

- B. The chairs and members of the National, Regional and Chapter Nominating committees shall not be a candidate for any elective office on the respective level while serving on either of the Nominating Committees.
- C. The chair and members of the National Finance Committee shall be ineligible for re-election to the same position on the committee.
- D. The chairs and members of the National and Regional Nominating Committees must resign prior to the call for nominations to be eligible to run for an office or position on either the National or Regional level.
- E. The chair and members of the Chapter Nominating Committee must resign prior to the call for nominations to be eligible to run for a chapter office or position, including running from the floor.
- F. Members of the National Scholarship and Standards Committee shall be ineligible for re-election to the same position on the Committee.

Section 10. ELIGIBILITY REQUIREMENTS

- A. To be eligible for National or Regional Office, elected National or Regional Committee chairs or members, a member must:
 - 1. be financial with a chapter and the Grand Chapter for the period beginning with the first day of the National Convention preceding the one at which the national election will occur and continuing through her term of office;
 - 2. be financial with a chapter and Grand Chapter for the period beginning with the first day of the Regional Conference preceding the one at which the regional election will occur and continuing through the term of office;
 - 3. be present at the National Convention or Regional Conference at which she is to be elected;

4. have attended at least two of the last three National Conventions and two of the last three Regional Conferences held previous to her nomination, except that this provision does not apply to candidates for the positions reserved for collegiate members by these *Bylaws*;
 5. be available to travel to regional and national meetings and perform duties of the office;
 6. not have been sanctioned resulting in probation or suspension and rehabilitation within two years prior to her nomination for a national or regional office.
- B. National Second Vice President, Regional Representatives, and other collegiate positions on all levels:
1. Only collegiate members are eligible for the office of National Second Vice President and other positions so reserved by these *Bylaws*.
 2. A candidate for any of these positions shall:
 - a) have been continuously financial from the date of her initiation; and
 - b) have at least one full academic year left in school at the time of election.
- C. Local chapter's eligibility requirements cannot exceed those eligibility requirements of Grand Chapter.

Section 11. SUCCESSION

When a vacancy occurs in the office of International President, the National First Vice President shall become International President to complete the unexpired term.

Section 12. VACANCIES

- A. When vacancies occur in other national or regional offices, a replacement shall be recommended by the International President

as soon as practicable, but no more than 45 days after such vacancy occurs, for election by the National Board of Directors.

- B. When vacancies occur at the regional level, the Regional Director shall fill the vacancy as soon as practicable, but no more than 45 days after such vacancy occurs, with the approval of the International President.
- C. When a vacancy occurs in the Immediate Past President position, its consultative and voting role on the National Board of Directors will be designated for a Past National President, and will be recommended by the International President within 45 days after such vacancy occurs.

Section 13. IMPEACHMENT

- A. An officer may be impeached by the International President upon approval of the Board of Directors.
- B. Any officer who has been impeached shall be ineligible for election to any national, regional or chapter office.
- C. The impeachment process shall be carried out in accordance with the Impeachment Procedures as outlined in the *Chapter Management Handbook*.

ARTICLE X – DUES AND FEES

Section 1. ANNUAL DUES AND FEES

- A. The annual chapter and Grand Chapter dues and fees for all members shall be due September 30 and payable July 1 – September 30 of each year.
 - 1. All collegiate and alumnae members shall pay chapter and national dues annually.

2. All categories of life paid-in-full members shall pay chapter dues annually.
- B. A member who fails to pay Grand Chapter and chapter dues for the ensuing fiscal year by September 30 shall pay a late fee. The late fee shall be payable from October 1 to December 31.
- C. A soror who is not financial for the current year shall pay a reinstatement fee to National Headquarters.
- D. Chapters shall not require sorors to pay a chapter reinstatement fee nor a chapter late fee.
- E. All dues and fees shall be paid through the chapter except member-at-large dues.
- F. Chapters shall not assess members any fees or fines other than chapter dues.

Section 2. MEMBER-AT-LARGE DUES AND FEES

- A. All dues and fees of a member at large shall be paid directly to National Headquarters.
- B. A member at large shall have all privileges of Grand Chapter membership except those of voting and holding elective office.

Section 3. APPLICATION, GRAND CHAPTER AND CHAPTER INITIATION FEES

Each applicant shall pay a non-refundable application fee for submission of an application for membership into the Sorority to defray chapter expenses.

Each candidate for membership in the Sorority shall pay Grand Chapter and chapter initiation fees.

Section 4. CORPORATE FEES

A. Grand Chapter Corporate Fees

Each chapter shall remit a Grand Chapter corporate fee to National Headquarters to support national services to chapters.

B. Regional Corporate Fees

Each chapter shall remit a regional corporate fee to National Headquarters to support regional operations.

Section 5. ANNUAL FINANCIAL REPORT AND FEDERAL INCOME TAX GROUP RETURN AUTHORIZATION

- A. Each chapter shall submit an Annual Financial Report and Federal Income Tax Group Return Authorization form by February 28.

Section 6. LIABILITY INSURANCE

- A. Each chapter shall be covered by general liability insurance, which is solely available through Grand Chapter.

Section 7. BONDING

- A. Each chapter shall be covered by general bonding insurance, which shall be provided through Grand Chapter.

Section 8. REMITTANCES TO NATIONAL HEADQUARTERS

Remittances to National Headquarters shall be in accordance with Grand Chapter fiscal policy and procedures.

- A. Form - All funds remitted to National Headquarters shall follow the procedures outline in the Fiscal Officers Manual.

- B. Time - All funds shall be remitted to National Headquarters within 30 days of receipt.

Section 9. DUES AND FEES SCHEDULE

Any recommended increase in dues and fees shall be submitted for approval by the convened voting delegates of Grand Chapter. Members of the Sorority shall remit dues and fees according to the established schedule.

A. Annual Grand Chapter Dues and Fees

1. Chapter Members

- a) Collegiate or Alumnae Member Dues - \$190.00
- b) Paid-in-Full Life Members shall not pay annual Grand Chapter dues.

2. Member at large

- a) Alumnae Member-at-Large Dues - \$390.00 (\$190.00 national dues; \$200.00 member-at-large fee)
- b) Collegiate Member-at-Large Dues - \$240.00 (\$190.00 national dues; \$50.00 member-at-large fee)
- c) Paid-in-Full Life Members-at-Large Fee - \$200.00
- d) If an Alumnae member changes status from regular member to member-at-large, there will be a \$25.00 processing fee.
- e) If an Alumnae member changes status from member-at-large to regular member, there will be a \$25.00 processing fee.

B. Annual Chapter Dues

- 1. Each chapter shall determine its dues.
- 2. Chapter dues are due and payable at the same time as Grand Chapter dues.

C. Grand Chapter Dues Late Fee

A \$10.00 Grand Chapter dues late fee shall be assessed to any

member paying dues from October 1 to December 31.

D. Grand Chapter Reinstatement Fee

1. Grand Chapter Reinstatement Fee - \$15.00
2. If a soror has not paid all dues and fees for two or more years, she shall pay a reinstatement fee of \$30.00.
3. Chapters shall not impose a reinstatement fee.

E. Initiation Fees

1. Grand Chapter Initiation Fees
 - a) Collegiate Member - \$750.00
 - b) Alumnae Member - \$975.00

The fees listed above include National dues for the current and next fiscal year, the Capital Fund, DREF Support Fund and the National Initiation fee.

2. Chapter Initiation Fee

- a) Chapter initiation fee not to exceed \$400
- b) Initiation fee does not include chapter dues.

F. Corporate Fees

1. National Corporate Fee
 - a) Collegiate Chapter - \$25.00
 - b) Alumnae Chapter - \$50.00
2. Regional Corporate Fee
 - a) Collegiate Chapter - \$25.00
 - b) Alumnae Chapter - \$50.00

G. Insurance

1. Annual Chapter Liability Insurance
Each chapter shall pay the Chapter Liability Insurance at the current market rate for each member.
2. Annual Chapter Bonding Insurance
Each chapter shall pay the Chapter Bonding Insurance at the current market rate

H. Per Capita Fee

Each member shall pay an annual per capita fee of \$10.00 payable when dues are paid.

Section 10. FISCAL YEAR

The fiscal year of the Sorority shall begin January 1 and end December 31.

Section 11. ACCOUNTING FOR FUNDS

A. Accounting for Grand Chapter Funds

Persons authorized to expend the funds of the Grand Chapter shall account for such upon request and at the end of each fiscal year according to procedures established by the Grand Chapter.

B. Accounting for Chapter Funds

Persons authorized to expend the funds of a chapter shall account for such upon request and at the end of the fiscal year according to procedures established by the chapter and the Grand Chapter.

Section 12. BONDING OF OFFICERS

A. Bonding of National Officers

The International President, the National Treasurer, the Executive Director, Chief Financial Officer and any officers or employees who have fiduciary responsibilities for Grand Chapter funds shall be covered by general bonding insurance.

B. Bonding of Chapter Officers

The chapter president, the chapter treasurer, the chapter financial secretary and any officers who have fiduciary responsibilities for chapter funds shall be covered by general bonding insurance.

Section 13. EXPENSES PAID

A. Expenses Paid by Grand Chapter

Approved transportation and expenses of a national or regional officer shall be paid by the Grand Chapter according to procedures established by the National Board of Directors.

B. Expenses Paid by Chapter

When a national or regional officer is invited to visit a chapter, the chapter is responsible for transportation, housing and related costs and courtesies.

Section 14. EXEMPTION FROM PAYMENT OF GRAND CHAPTER DUES AND FEES

The Past National Presidents, Grand National Officers Emeritae and Honorary Members shall be exempt from the payment of Grand Chapter dues and fees and enjoy the privileges of life membership.

ARTICLE XI – FINANCIAL AID

Section 1. SCHOLARSHIPS, GRANTS AND AWARDS

- A. The Grand Chapter shall grant financial aid each year to individuals pursuing higher education as follows:
 - 1. awards for members pursuing baccalaureate degrees or its equivalent, or advanced degrees; and
 - 2. special grants and awards as recommended by the National Scholarship and Standards Committee.

Section 2. SPECIAL SCHOLARSHIPS

The Sorority has established the following special scholarships, which are awarded only to members of the organization on the basis of meritorious achievement:

Communications - Julia Bumry Jones Scholarship in Memory of Soror Jones;

Social Group Work - Juliette Derricotte Scholarship in Memory of Soror Derricotte;

Law - Sadie T. M. Alexander Scholarship in Memory of Soror Alexander;

Arts - Performing or Creative - Myra Davis Hemmings Scholarship in Memory of Founder Hemmings;

Education - Bertha Pitts Campbell Scholarship in Memory of Founder Campbell; and

Ministry/Religion - Vashti Turley Murphy Scholarship in Memory of Founder Murphy.

ARTICLE XII – VIRTUAL MEETINGS AND ELECTRONIC COMMUNICATIONS

The Grand Chapter voting delegates, National Board of Directors, the National Executive Committee, National Committees, National Commissions and Ad Hoc committees and all regional meetings, chapter meetings and chapter committees and subcommittees shall be authorized to conduct virtual meetings provided all members can simultaneously hear others and participate during the meeting.

All communication may be sent electronically in accordance with Delta's Technology Guidelines.

ARTICLE XIII – DISCIPLINE

Section 1. CODE OF CONDUCT

The Sorority, a national, cultural, educational and service organization, requires that its members exemplify the highest qualities of finer womanhood and that their actions reflect the ideals and principles of the Sorority. The types of conduct by members, sorors, applicants, candidates, pyramids, and chapters that are unacceptable, and the related disciplinary action(s) are set forth in the Code of Conduct, established by the National Scholarship and Standards Committee and approved by the National Board of Directors.

Section 2. INDIVIDUAL CODE OF CONDUCT

- A. A soror may be placed on probation, suspended, expelled from the Sorority, fined or required to repay expenses incurred, as appropriate for:
 - 1. violation of the *Constitution and Bylaws*, the Code of Conduct, and any other policies and procedures of the Sorority; or
 - 2. infractions of the rules and regulations of the college or university hosting the chapter.
- B. Any soror/member who participates in underground, unauthorized, or illegal membership intake activities shall be subject to sanctions as stated in the Code of Conduct.
- C. The Regional Director, with the approval of the International President, may discipline an individual as stated in the Code of Conduct.
- D. The International President or the National Scholarship and Standards Committee may discipline an individual as stated in the Code of Conduct.

- E. The International President has the authority to suspend an individual upon the recommendation of the Regional Director or National Scholarship and Standards Committee.
- F. Membership in the Sorority may be suspended by the National Scholarship and Standards Committee or Regional Director for an extended period when the circumstances warrant such actions.
- G. The International President has the authority to expel an individual upon the recommendation of the Regional Director or National Scholarship and Standards Committee.
- H. A soror/member on probation or under suspension shall not participate in any activity of the Sorority, unless otherwise prescribed by the Regional Director, National Scholarship and Standards Committee or the International President.
- I. A soror/member against whom a fine or other financial obligation has been imposed shall not participate in any Sorority activity until she has satisfied fully the financial obligation.
- J. If a soror/member has not satisfied her fine or financial obligation and rehabilitation plan within a five-year period from the date of expiration of the sanction, she shall be expelled by the International President.
- K. A soror who renounces Delta Sigma Theta Sorority, Incorporated and fails to inform and comply with the Sorority's renouncement process shall be summarily expelled from membership for violation of the Code of Conduct, and shall be subject to civil legal action by the Sorority for violation of the Sorority's intellectual property.

Section 3. CHAPTER CODE OF CONDUCT

- A. A chapter may be placed on probation by the Regional Director, the National Scholarship and Standards Committee or the International President as stated in the Code of Conduct. Probation may be for one or more of the following reasons:
 - 1. failure to submit a copy of the chapter Rules of Order Form and Policies and Procedures to the National Scholarship and Standards Committee for approval;
 - 2. failure to submit the proper forms and/or reports to National Headquarters;
 - 3. beginning the Membership Intake Program without authorization from National Headquarters;
 - 4. failure to observe the rules and regulations of the Grand Chapter;
 - 5. failure to give the Regional Director evidence of a chapter program consistent with the national program of the Sorority;
 - 6. failure to pay dues and fees as required by the Grand Chapter; and
 - 7. failure to adhere to the approved national Membership Intake Program.

- B. A chapter which is on probation shall not participate in any activity of the Sorority, except those specified, monitored activities as approved by the Regional Director.

- C. The International President has the authority to suspend a chapter upon the recommendation of the Regional Director or National Scholarship and Standards Committee, as stated in the Code of Conduct for:
 - 1. unexcused absence from two consecutive National Conventions;
 - 2. unexcused absence from two consecutive Regional Conferences;
 - 3. failure to comply with the rulings of the Regional Director, the National Scholarship and Standards Committee, the International President or the Grand Chapter;

4. holding a membership intake not in conformity with the rules and regulations of the Grand Chapter; or
 5. holding any activity during membership intake which involves hazing.
- D. A chapter that fails to remedy the condition leading to suspension may be required to appear before the National Board of Directors for a hearing, at the expense of the suspended chapter.
- E. As a condition of reinstatement, a suspended chapter shall be subject to sanctions as detailed in the Code of Conduct, and must undergo a program of rehabilitation over a period of time as prescribed by the National Scholarship and Standards Committee.

During the period of suspension, neither the chapter nor any of its members shall participate in any activity of the Sorority, except those rehabilitative activities outlined by the National Scholarship and Standards Committee.

- F. The National Scholarship and Standards Committee or Regional Director may recommend to Grand Chapter, the recall of the charter of a chapter for:
1. proceeding contrary to the *Constitution and Bylaws*;
 2. persistent negligence in payment of dues;
 3. failure to meet program goals; or
 4. any other reason which makes such a recommendation necessary.
- G. Names of chapters shall be recalled or retired by the National Board of Directors, upon the recommendation of the National Scholarship and Standards Committee, for one of the following reasons:
- a. A chapter (alumnae or collegiate) has been inactive for five or more years and shows no indication of revival within a reasonable period;
 - b. College/university mergers have caused the dissolution of a campus-based chapter; or

- c. The college/university (where a campus-based chapter was chartered) ceases to exist.
- H. A chapter may be disciplined and fined by the National Scholarship and Standards Committee or the International President for failure to submit the Annual Financial Report and Federal Income Tax Group Return Authorization form.
- I. The International President has the authority to revoke a chapter's charter if the chapter's fine or financial obligations have not been satisfied within a ten-year period, from the inception of the sanction.

Section 4. HAZING

- A. The Sorority has a zero tolerance hazing policy. This policy prohibits all acts and forms of hazing or harassment, both physical and mental, before, during or after the Membership Intake Process.
- B. The Sorority does not consent to, condone, acquiesce in or tolerate any act of hazing, harassment or humiliation in the Membership Intake Program. The Sorority has approved no practices that are inconsistent with its zero tolerance hazing policy, which is embodied in numerous Sorority documents that are disseminated to members, including the *Constitution and Bylaws*; the Code of Conduct; the Administrative Procedures Manual for Membership Intake; and the "no hazing" contract members are required to sign. The Sorority disclaims responsibility or liability for any injury, damages, or claims, that are related to or results from the conduct of any individual(s), groups, or associations purporting to perform any unapproved acts in the name of the Sorority.

- C. No woman, otherwise qualified for membership, will be denied membership into the Sorority solely by reason of being related to a member of the Sorority.
- D. Penalties
 - 1. Any chapter violating any of the above-delineated paragraphs will be penalized by:
 - a) denial of membership intake by the Regional Director with approval of the International President and the National Board of Directors, or by the International President with approval of the National Board of Directors; or
 - b) suspension by the Regional Director with approval of the International President and the National Board of Directors, or by the International President with approval of the National Board of Directors.
 - 2. Any individual violating any of the above-delineated paragraphs will be penalized by:
 - a) suspension by the Regional Director with approval of the International President; or
 - b) summary expulsion by the International President with the approval of the National Board of Directors.
 - 3. Suspensions and expulsions shall be reported to the National Board of Directors and the Grand Chapter.
 - 4. Each violation is subject to fines, as detailed in the Code of Conduct, in addition to suspension with concurrence of the International President and the Regional Director.

Section 5. APPEALS

- A. Upon suspension, probation, imposition of fine or any other sanction, individuals or chapters shall be given written notice of charges, the Sorority's action and the reason therefore. Within 30 days of receipt of the notice, the individual or chapter may appeal at her or its own expense to the following, in accordance with the appeals procedures:

1. the National Scholarship and Standards Committee;
 2. the National Board of Directors; or
 3. the Executive Session of the National Convention.
- B. The appeals procedure is set forth in the *Chapter Management Handbook* (as approved by the Grand Chapter or the National Board of Directors).

Section 6. EMPLOYEE, DIRECTOR, OFFICER AND VENDOR CODE OF CONDUCT AND CONFLICT OF INTEREST

The National Board of Directors shall adopt and revise, as appropriate, a Code of Ethics and Conduct applicable to all directors, officers, employees, and vendors. The Executive Director and General Counsel-Compliance Officer in consultation with the International President, shall be authorized to issue such interpretations and directives under the Code relative to employees and vendors.

Any duality of interest, conflict of interest, or potential conflict of interest on the part of any Member of the Board or Soror shall be disclosed and made a matter of record at such time and in such manner as may be prescribed in the Code of Ethics and Conduct and in any subsequent action of the Board. Any Director having such a duality of interest, conflict of interest, or potential conflict of interest on any matter shall not vote or use his or her personal influence on the matter, and such Director shall not be included in determining a quorum for any meeting of the Board, or a Committee, thereof, at which an action related to such matter is proposed to be taken. The minutes of any such meeting shall reflect the disclosure by such director, her abstention from voting and the presence or absence of a quorum without including such director.

Each Director, Officer, and Senior Headquarters staff shall complete a personal disclosure statement on at least an annual basis. Disclosure statements shall take such form and contain such information as may be required under the Code of Ethics and Conduct and shall be filed with the

General Counsel-Chief Compliance Officer. The General Counsel-Chief Compliance Officer shall submit a compliance report to the Audit and Compliance Committee or Executive Committee.

ARTICLE XIV – BINDING ARBITRATION

- A. Any dispute, conflict, claim and/or cause of action of any kind whatsoever (collectively “dispute”), including but not limited to, contract claims; personal injury claims; bodily injury claims; injury to character claims; property damage claims; and physical mental, or emotional claims, arising out of, or relating to, any Sorority activity or any transaction the Sorority has with any member, soror, or any chapter, shall be subject to and resolved by binding and compulsory arbitration, which shall be conducted by a panel of arbitrators under the terms of the Federal Arbitration Act, 9 U.S.C. § 1, et seq., and the then-existing Commercial Arbitration Rules of the American Arbitration Association. Arbitration shall be conducted in the District of Columbia. The decision of the trial arbitrator(s) may be appealed to an appellate arbitration panel within thirty-five (35) days of the date of the arbitration decision. If the decision is not appealed within the stated time, it shall become final and binding upon all parties. The appellate arbitration panel may review an arbitration decision for legal sufficiency only, and may reverse the trial arbitration decision only if legal efforts are present. The decision of the appellate arbitration panel shall be binding on all parties. Judgment upon an award rendered by the arbitrator(s) may be entered in any court having jurisdiction.
- B. The procedure for submitting a matter or arbitration is set forth in the *Chapter Management Handbook* (as approved by the National Board of Directors).
- C. Any member, soror, or chapter who refuses to be subject to or bound by this Article shall be summarily expelled from the Sorority.

ARTICLE XV – INDEMNIFICATION

General Authority – Unless otherwise prohibited by law, the Sorority shall have the power to indemnify any Member of the Board, Officer, or employee of the Sorority who, when acting within the scope of his or her duties, was or is a party or is threatened to be made a party to any threatened, pending or completed action, suit, or proceeding, whether civil, criminal, administrative, or investigative (other than an action, suit, or proceeding by or in the right of the Sorority) by reason of the fact that such person is or was a director, an Officer, or employee of the Sorority, or is or was serving at the request of the Sorority as a director, Officer, or agent of another corporation, partnership, joint venture, trust, or other enterprise, from and against any and all expenses (including attorneys' fees), judgements, fines and amounts paid in settlement and actually and reasonably incurred by such person in connection with any such action, suit, or proceeding if such person acted in good faith and in a manner he or she reasonably believed to be in or not opposed to the best interests of the Sorority and, with respect to any criminal action or proceeding, had no reasonable cause to believe such person's conduct was unlawful, except.

However, the Sorority shall not indemnify any such person in relation to matters as to which such person shall be adjudged in a final, non-appealable order of a court of competent jurisdiction to be liable for gross negligence or willful misconduct. The termination of any action, suit, or proceeding by judgment, order, settlement, or conviction, or upon plea of nolo contendere or its equivalent, shall not of itself, create a presumption that the person did not act in good faith and in a manner that such person reasonably believed to be in or not opposed to the best interests of the Sorority, or acted with gross negligence or willful conduct and, with respect to any criminal action or proceeding, had reason to believe that such person's conduct was unlawful.

ARTICLE XVI – PUBLICATIONS

The Grand Chapter of Delta Sigma Theta Sorority, Incorporated is authorized to publish the following:

The *DELTA*, the official publication of the Sorority;

The *Ritual*, the official ceremonies and observances of the Sorority;
and

Such other publications as may from time to time be necessary on the history, traditions and regulations of the Sorority.

ARTICLE XVII – QUORUM

A majority shall constitute a quorum for the National Executive Committee.

A majority shall constitute a quorum for the National Board of Directors.

Sixty percent (60%) of the chapters in good standing represented at National Conventions or Regional Conferences shall constitute a quorum.

Local Chapters shall have no less than a 25% minimum quorum requirement.

ARTICLE XVIII – AUTHORIZATION

Section 1: Restriction of Authority to Act for the Sorority

No Officer, agent, representative, employee, member or Soror of the Sorority shall or may accept funds designated for the Sorority; or expend any of its money; incur any liability or indebtedness; give or offer any indemnification; or enter into any agreement or contract on behalf of the Sorority; use the seal, indicia, or trademark of the Sorority, directly or

indirectly, obligate the Sorority, or so utilize its property rights unless duly authorized in a manner consistent with and pursuant to a grant of authority or responsibility under these Bylaws, or pursuant to an action of the Board.

ARTICLE XIX – PARLIAMENTARY AUTHORITY

All matters not covered by the *Constitution and Bylaws* and other governing documents of the Sorority will be governed by the current edition of *Robert's Rules of Order, Newly Revised*.

ARTICLE XX – AMENDMENTS

These *Bylaws* may be amended by a two-thirds (2/3) vote of the voting delegates assembled in the National Convention, provided at least 60% of the chapters in good standing are represented.

Proposed amendments shall be published to the Grand Chapter by January 31 before the convening of the National Convention.

Upon the declaration of extenuating circumstances and to protect the best interests of the Sorority, as determined by the National Board of Directors; upon the recommendation of the International President the *Constitution* may also be amended by a two-thirds (2/3) vote of a virtual assembly of the voting delegates of Grand Chapter provided that at least 60 % of all chapters in good standing are represented.

In the instance of a declaration of extenuating circumstances by the National Board upon the recommendation of the International President, proposed amendments shall be published to the Grand Chapter at least 60 days before the commencing of the virtual assembly.

Permission is herein granted to correct amendments for article and section designations, punctuation, grammar, cross-references and to make other technical and conforming changes as may be necessary.

ARTICLE XXI – BYLAWS

These *Bylaws* shall be deemed to supersede and replace all existing policies, procedures, *Bylaws*, governance documents, regulations, or actions taken ratified.

INDEX

	Page
Accounting for Funds.....	68
Active/Inactive Status of Chapter.....	15, 18, 24, 74
Additional Chapter(s).....	20-22
Advisor(s).....	17-19
Alumnae Chapters.....	2, 5, 15, 19
Alumnae Member.....	2, 8, 11
Alumnae Member at large (Definition).....	8
Amendments.....	7, 81
Annual Financial Report (IRS).....	65
Appeals.....	76
Appointment of National Committees and Commissions.....	52
Arts and Letters Commission.....	37, 49
Audit and Corporate Compliance Committee.....	36, 40
Authorization.....	80
 Binding Arbitration.....	 78
Bonding, Bonding Insurance.....	23, 65, 67-68
Bonding of Officers.....	68
Bylaws.....	82
 Campus-Based Chapter.....	 16-18
Chapter Code of Conduct.....	73
Chapter Elections.....	56
Chapter Establishment and Maintenance.....	16
Chapter Meetings.....	5
Chapter Responsibility.....	13, 23
City-Wide Chapter.....	30-31
Code of Conduct.....	71
Collegiate Chapters.....	16-17
Collegiate Member.....	2, 8
Communications and Public Relations Committee.....	36, 41
Confidential Records.....	35

Constitution and Bylaws Committee.....	36, 42
Core Chapter.....	16-18
Corporate Seal.....	2
Credentials Committee (National Convention).....	50
Coordinating Council.....	21
Corporate Fees.....	23, 64, 67
Definitions.....	8
Delegates.....	9
Denial of Membership.....	76
Diamond Life.....	9
Discipline.....	71
Disclaimer of Liability.....	75
Distinguished Professor Endowed Chair Committee.....	36, 42
Documents Review and Management Committee.....	36, 43
Dues and Fees.....	4, 63
Dues and Fees Schedule.....	65
Duties of National Officers.....	25
Elections.....	54
Electronic Meetings and Communications.....	70
Eligibility Requirements.....	61
Employee/Director/Officer/Vendor Code of Conduct.....	77
Exemption from Grand Chapter Dues and Fees.....	69
Expenses Paid.....	69
Finance.....	4
Finance Committee.....	36, 37
Financial Aid.....	69
Fiscal Year.....	68
Golden Life.....	9
Grade Point Average/Maintenance.....	10-12, 15
Grand Chapter.....	1
Grants.....	69

Hazing.....	75
Heritage and Archives Committee.....	36, 43
Honorary Member.....	9, 13
Housing and Properties Committee.....	36, 43
Human Resources Committee.....	36, 44
Impeachment.....	63
Incorporation.....	5
Indemnification.....	79
Individual Code of Conduct.....	71
Initiation Fees.....	64, 66
Installations.....	59
Institutional Research Committee.....	36, 45
Internal Revenue Classification.....	2
Late Fee.....	63, 66
Leadership Academy.....	36, 45
Legacy (Definition).....	10
Legal Expenses.....	23
Liability.....	6, 23
Liability Insurance.....	65
Life Member.....	9
Life Memberships.....	9
Limitation of Office.....	60
Limitation of Tenure.....	60
Meetings.....	4
Member at large (Definition).....	8
Member (Definition).....	8
Members (Individual).....	2, 8-9
Membership (Requirements).....	10-16
Membership Intake.....	10-16
Membership Services Committee.....	36, 46

Name.....	1
National Board of Directors.....	4
National Committees.....	4, 36
National Commissions.....	4, 52
National Convention.....	4
National Convention Committees.....	50
National Convention Planning Committee.....	51
National Executive Committee	34
National Headquarters.....	52
National Headquarters Staff.....	52-53
National Multicultural Greek Council.....	11, 41
National Officers.....	4, 47
National Pan-Hellenic Council/Panhellenic Conference.....	19, 22
Nomenclature.....	21
Nominating Committee.....	36, 39
Object(Purpose).....	2
Parliamentary Authority.....	6, 81
Penalties.....	76
Per Capita Fee.....	67
Policies and Procedures.....	22
Preamble.....	1
Probation.....	71-73
Program Planning and Development Committee.....	36, 46
Protocol and Traditions Committee.....	36, 47
Publications.....	80
Quorum.....	10, 80
Regional Conferences.....	4
Regional Nominating Committee.....	51
Regional Officers.....	25, 31
Regions.....	2
Reinstatement Fees.....	63

Removal of Board Member.....	35
Renouncement of Membership.....	72
Repay Expenses.....	71
Residency Requirement.....	56
Ritual and Ceremonies Commission.....	37, 49
Rules of Order.....	22
Sanctions.....	71, 74
Scholarship and Standards Committee.....	36, 73
Service Area.....	11
Social Action Commission.....	37, 50
Soror (Definition).....	8
Special Dispensation.....	16, 20
Strategic Partnership Committee.....	36, 47
Strategic Planning Committee.....	36, 47
Succession.....	62
Suspension.....	72
Technology Committee.....	36, 48
Tenure.....	56, 60
Term of Office.....	59
Transferring Membership.....	15
Transition Meetings.....	27
Vacancies.....	62
Virtual Meetings.....	70
Voting.....	34

NOTES

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ERRATA SHEET FOR THE TRANSCRIPT OF DORCAS WASHINGTON

Case Name: Alpha Kappa Alpha Sorority v. Stroll to the Polls, Inc.
Case Number: Opposition No. 91,267,937
Deposition Date: August 29, 2024

The witness, Dorcas Washington, states that she wishes to make the following changes in testimony as originally given:

Correction Code:

1. Clarification
2. Misspelled Word
3. Wrong Word
4. Omitted Word
5. Other

Page	Line	Now Reads	Should Read	Code
2	23	Galinda	Galindo	2
22	6	New Jersey	Maryland	3
23	20	DIV	DID	2
43	21	pragmatic	programmatic	3

Signature: 

Date: 10/17/2024

Exhibit B

IN THE UNITED STATES PATENT AND
TRADEMARK OFFICE - BEFORE THE
TRADEMARK TRIAL AND APPEAL BOARD

Ser. No. 90/012, 428

Opposition No. 91267937

IN THE MATTER OF: STROLL TO THE)
POLLS) REMOTE
)
)
ALPHA KAPPA ALPHA SORORITY,)
) DEPOSITION OF:
)
) DR. ERIN
-vs-) SYLVESTER
) PHILPOT
STROLL TO THE POLLS, INC.)
)
Defendant.

TRANSCRIPT of the stenographic notes of
the proceedings in the above-entitled matter, as
taken by and before PATRICIA SMITH, a Certified
Shorthand Reporter and Notary Public of the State of
New Jersey, held remotely via Zoom teleconference on
Friday, July 26, 2024, commencing at 3:05 p.m.

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INDEX

WITNESS: DIRECT CROSS REDIRECT RECROSS

DR. ERIN SYLVESTER PHILPOT

By Mr. Stanback 4

E X H I B I T S

No.	Description	Page
STTP-1,	Notice of Deposition	13
STTP-2,	Disclosures	13
STTP-3,	Trademark Application	18
STTP-4,	Declaration of Erin Philpot	29
STTP-5,	FaceBook posts	50

1 DR. ERIN SYLVESTER PHILPOT, having been first duly
2 sworn, testified as follows:

3 DIRECT EXAMINATION BY MR. STANBACK:

4 Q. So, Ms. Philpot, as I just said, my name
5 is Willard Alonzo Stanback, and I'm here with Caron
6 Johnson, and the two of us are representing the
7 applicant, Stroll to the Poll, Inc.

8 MR. STANBACK: And, Jessica, I don't
9 know if you want to do a formal introduction of
10 yourself on the record.

11 MS. EKHOFF: Sure. I'm Jessica Ekhoft
12 from the law firm of Pattishall, McAuliffe, Newbury,
13 Hilliard & Geraldson and I represent Alpha Kappa
14 Alpha sorority.

15 Q. Ms. Philpot --

16 MR. STANBACK: Patty, does she need to
17 give her address and things like that? Why don't we
18 go ahead and do that?

19 Q. Can you provide your name and your full
20 address?

21 A. Sure. My name is Erin Sylvester
22 Philpot, legal last name Philpot, but, functionally,
23 in the academic world I use my maiden name as well.

24 I reside at 614 Plantation Road in
25 Tallahassee, Florida 32303. And I currently work for

1 Florida State University.

2 Q. Thank you.

3 A. Yup.

4 Q. Ms. Philpot, I'm going to go through --
5 I have a couple of my instructional notes that I will
6 read through for you and, hopefully, we can follow
7 the bouncing ball a little bit on this. It's minimal
8 instructions, just really to make sure that we are
9 somewhat on the same page in terms of the process and
10 how we can make this as efficient as possible.

11 So, as you can imagine, since we are in
12 sort of a deposition context, that is going to be
13 easier for all of us to manage if we have one person
14 speaking at a time, especially since we are doing
15 this virtual.

16 And I'm skipping over some things since
17 Kyle is not here, I don't have to really refer to
18 that, but I will say that to the extent that you
19 think that something we are asking is based on a
20 conversation you have had with the lawyer, I mean
21 Kyle in that situation, then we are not trying to get
22 to what we call attorney-client privilege type of
23 information. It's kind of challenging since Kyle is
24 not here to be able to make him make that objection
25 for you. But I want you to understand that's not the

1 type of information that we are trying to obtain.

2 All right. It's important that if I say
3 something that you don't understand or you have some
4 questions about, you should feel free to ask me to
5 clarify it. I mean, because the objective here is to
6 try to get the best questions for you so you can have
7 the best answers from you. Okay?

8 Are you by yourself in the room there?

9 A. I am, yes.

10 Q. Okay. What we are trying to do is kind
11 of get a sense of what you know about this matter,
12 about the terminology that we are using, we call it
13 "the mark," other people may not call it a mark. We
14 call it the mark, and that's the Stroll to the Poll
15 mark.

16 Unlike normal conversation, we would ask
17 that you don't do the "uh-huh" or shake your head or
18 things like that because we need to have Patty kind
19 of record it in terms of verbiage for the record, as
20 we go along. And Patty may, on occasion, stop us and
21 ask you to say something verbally or to clarify
22 something if she can't hear it. That's not out of
23 disrespect. That's just to make sure we have the
24 cleanest record possible.

25 If you think that you need to take a

1 break or if Jessica thinks we need to take a break,
2 or Patty, too, we will do that. I just ask that we
3 not take a break if we've already asked the question
4 and a question has not been responded to yet.

5 So, do you understand all those
6 instructions and what we are trying to do with
7 respect to that?

8 A. Yes, I understand.

9 Q. You agree to all that?

10 A. Yes, I do.

11 Q. Okay. Jessica, any thoughts?

12 MS. EKHOFF: No. Thank you.

13 Q. Okay. Before we get into the substance
14 I would like to do what I call some housekeeping
15 questions.

16 So one of the questions I have: Have
17 you ever been deposed or given testimony before?

18 A. No, I have not.

19 Q. Okay. Well, welcome.

20 A. Thanks.

21 Q. Do you have an understanding that since
22 you're under oath it's basically like being in a
23 courtroom? So, we want you to, of course, tell the
24 truth, the whole truth, nothing but the truth, that
25 type of thought process in terms of thinking about

1 your answers.

2 A. Yes.

3 Q. Of course, from our standpoint, we would
4 like you to be as complete as possible with respect
5 to those answers.

6 Are you taking any medication or do you
7 have anything else that's going on that could have an
8 impact on your ability to review the documents or to
9 respond to the questions?

10 A. No, I am not.

11 Q. I appreciate that. So let's jump into
12 some of these documents now.

13 MR. STANBACK: Caron, you're controlling
14 the uploading?

15 MR. JOHNSON: Yes, let me share my
16 screen here.

17 Q. Ms. Philpot, do you have a copy of the
18 documents? We sent them to Kyle.

19 A. I don't know which documents
20 specifically. I have some copies of things.

21 Q. So, this will be something that came in
22 in the last couple of hours.

23 A. No, I do not.

24 Q. Okay. We will see what we can do based
25 on what we have and also us putting it on the screen.

1 A. I do see -- okay. 12/30, 7 p.m. e-mail.
2 Exhibits. Okay. I can see your screen, too. That
3 works.

4 Q. It may be better to look at it on your
5 own screen if you can do that separate because you
6 can manipulate the document a little bit more on your
7 own.

8 MR. STANBACK: Are you pulling it up,
9 Caron?

10 MR. JOHNSON: Yes, I am.

11 Q. So, Ms. Philpot, from what I just heard,
12 it sounds like you may have very recently received
13 this document?

14 I don't want to assume. Have you seen
15 this document before?

16 A. I have, yes.

17 Q. Okay. So, I want to point out to you
18 the reference at the top where it refers to the
19 Trademark Trial and Appeal Board.

20 Have you been involved in any other
21 matters that involve the Patent and Trademark Office
22 in terms of the Trademark Trial and Appeal Board? Or
23 just doing -- helping somebody be involved in the
24 registration of a trademark or service mark?

25 A. No, I have not.

1 Q. Okay. Looking at this exhibit you see
2 up in the top left-hand corner it refers to Alpha
3 Kappa Alpha sorority. You see the reference to
4 "opposer"?

5 A. Yes.

6 Q. Do you have an understanding of what it
7 means for Alpha Kappa, which I may call AKA, for AKA
8 to be an opposer in this proceeding?

9 A. Yes.

10 Q. Okay. What's your understanding of
11 that?

12 A. My understanding is that Alpha Kappa
13 Alpha Sorority does not believe that Stroll to the
14 Polls, Inc. should be able to secure a trademark.

15 Q. Okay. A trademark for anything in
16 particular?

17 A. I would imagine something about Stroll
18 to the Polls, but I do not know. I see, for the mark
19 Stroll to the Polls.

20 Q. Thank you.

21 A. Yup.

22 Q. Have you had any interaction with AKA
23 prior to getting involved with this particular
24 matter, these proceedings?

25 A. Yes.

1 Q. Can you tell me about that interaction?

2 A. Yes. From 2012 to 2014 I worked in the
3 Office of Fraternity and Sorority Life at the
4 Valdosta State University. And Alpha Kappa Alpha was
5 one of my intake C chapters at that time. I left
6 that position in 2014.

7 Then I also happened to be affiliated
8 with a Pan-Hellenic Greek sorority; and so by that,
9 happen to have friends in lots of different sorority
10 chapters, one of which is Alpha Kappa Alpha.

11 Q. I'm doing my shorthand here that's why
12 I'm not talking.

13 You said with the 2012 to 2014, what was
14 the organization that you were working in?

15 A. I worked for the university, Valdosta
16 State University, in their student activities office
17 but I was in the Office of Fraternity and Sorority
18 Life. I worked with the Social Greek Letter
19 organizations.

20 Q. So, you were Florida State -- I'm trying
21 to get the university name.

22 A. Valdosta State University.

23 Q. Can you spell that for me?

24 A. V-A-L-D-O-S-T-A. It's a small school in
25 rural southern Georgia.

1 Q. Okay. Thank you.

2 So, in those interactions with the
3 organization as opposed to members of the
4 organization, you were -- can you tell us what you
5 were doing?

6 A. Yes. I was the campus advisor. So I
7 was their university employee that worked with the
8 undergraduate students in the organization.

9 Q. Okay.

10 A. Help them kind of navigate the
11 university structure, to help them meet expectations
12 of student organizations, to be in good standing,
13 assist them in leadership development stuff for those
14 students, lots of risk mitigation and management.

15 Q. Okay. Thank you.

16 Going back to this notice of deposition,
17 you also see Stroll to the Polls, Inc. You see the
18 reference to "applicant"?

19 A. Uh-huh, yes.

20 Q. And what's your understanding of that
21 reference with respect to Stroll to the Polls, Inc.?

22 A. I assume that they are the group that is
23 applying for that mark to become trademarked as their
24 property, interest.

25 Q. Okay.

1 A. Something.

2 Q. Had you had knowledge of Stroll to the
3 Polls, Inc. prior to getting involved in this
4 particular matter?

5 A. No, not at all.

6 Q. Still on the same document, up in the
7 upper right-hand corner where it has a reference for
8 the mark and it says "Stroll to the Polls," do you
9 also see where it has a reference to a date for
10 filed?

11 A. Yes.

12 Q. What date do you see there?

13 A. June 20th, 2020.

14 Q. Okay. Thank you.

15 MR. STANBACK: Mr. Johnson, we will move
16 along. Have we entered this, Ms. Patty? Why don't
17 we enter this as Exhibit 1?

18 (Exhibit STTP-1, Notice of Deposition,
19 marked for identification.)

20 MR. STANBACK: Mr. Johnson, can you go
21 to the next exhibit, Exhibit 2?

22 (Exhibit STTP-2, Disclosures, marked for
23 identification.)

24 Q. Ms. Philpot, do you have a version of
25 that on your screen that you can peruse at your own

1 leisure?

2 A. Yes.

3 Q. Okay. I'm giving you some time so you
4 can absorb all that's there.

5 Have you seen this document before?

6 A. No.

7 Q. Before today?

8 A. This is the first time I have seen it.

9 Q. Okay. So I will represent to you that
10 this is a document that counsel for AKA filed that is
11 part of the proceeding that we have with the
12 Trademark Trial and Appeal Board, and to work with
13 that because we used to just call it the TTAB. So if
14 you hear me say the TTAB, that's what I'm referring
15 to.

16 You can see at the top of this that AKA
17 is also identified as or referenced as the opposer,
18 and Stroll to the Polls, Inc. is referenced as the
19 applicant.

20 A. Uh-huh.

21 Q. I would like you to focus on the second
22 page top. Right there. Thank you.

23 You see your name there in that
24 first block --

25 A. Yes.

1 Q. -- of the first row?

2 A. Uh-huh.

3 Q. Is that information current and
4 accurate?

5 A. Yes, it is. The phone number is
6 actually incorrect. But let me just real quick --
7 that might be our front desk and I didn't give my
8 direct line. I don't know this number off the top of
9 my head.

10 Q. Okay. We will just reference this for
11 our records "front desk number."

12 A. All that information is correct. That's
13 the front desk phone number.

14 Q. Okay. Now, looking at the second box,
15 you see the title that you have there?

16 A. That has been updated relatively
17 recently. So I no longer have "and identity" as part
18 of my title. I'm just the "assistant director for
19 leadership."

20 Q. Just out of curiosity, was that updated
21 within the last couple of months?

22 A. Yes.

23 Q. Okay. I will leave that there.

24 MR. STANBACK: Mr. Johnson, can you
25 scroll back up a little bit?

1 Q. Ms. Philpot, do you see that third
2 column that has the heading for that column?

3 A. Yes.

4 Q. So I want to give you that reference
5 before we go back to the box that is in the row with
6 your name.

7 A. Okay.

8 Q. Can you read what the heading is into
9 the record for us?

10 A. "General summary of testimony subjects."

11 Q. Thank you.

12 So as we go through some of these
13 questions, we are using this as somewhat of the
14 guidelines for our questioning. Because you have
15 been offered up as a witness to be able to testify to
16 the general summary -- topics that are in this box.

17 For the record, for convenience, can you
18 read for us the subjects that are in the box
19 associated with your name?

20 A. Sure. Use of the phrase "Stroll to the
21 Polls" by Florida State University; Florida A & M
22 University; the League of Women Voters; Florida PIRG
23 students; Campus Election Engagement Project; and the
24 Leon County Supervisor of Elections Office.

25 Q. Thank you.

1 So, can you tell us, in general, I'm
2 going to probably get more specific later, kind of
3 the basis of your knowledge of this use?

4 A. Sure. The groups that I just listed by
5 name utilized the use -- we used "Stroll to the
6 Polls" for an event that we held leading up to the
7 2020 general election at that point and used it on
8 our website to promote the event. At the event we
9 had stickers that we gave away. Probably had a
10 social media post about it, I believe.

11 Q. Okay. Anything else that you can think
12 of?

13 A. No.

14 Q. Okay. I may ask some more specific
15 questions a little later just so you know.

16 A. Sure.

17 MR. STANBACK: All right. We are going
18 to move on.

19 Mr. Johnson, can you bring up document
20 number three?

21 MS. EKHOFF: Was this entered as an
22 exhibit?

23 MR. STANBACK: Sorry. Can we enter
24 that, Patty, into the record?

25 (Exhibit 2 entered into the record.)

1 (Exhibit STTP-3, Trademark Application,
2 marked for identification.)

3 Q. Mrs. Philpot, have you seen this
4 document before?

5 A. No.

6 Q. Okay. So, I will represent to you that
7 this is a printout of the application that Stroll to
8 the Polls, Inc. filed in their efforts to get
9 registration of the Stroll to the Poll's mark.

10 A. Okay.

11 Q. As you can see --

12 MR. STANBACK: Mr. Johnson, can you
13 scroll down to the next page? Maybe a little
14 further. Stop there.

15 Q. So, I just wanted to show that this was
16 filed on June 20, 2020.

17 Do you see that in the document, Ms.
18 Philpot?

19 A. Yes. Date signed, yup.

20 MR. STANBACK: Mr. Johnson, can you roll
21 back up to -- right there.

22 Q. Ms. Philpot, do you see in the left-hand
23 side of that column, it says "identification"?

24 A. Yes.

25 Q. Can you read for me -- I will represent

1 that the identification is a listing of the goods
2 that the applicant is trying to identify with their
3 mark.

4 Can you read for us the goods that are
5 identified, on the right-hand column?

6 A. Yes.

7 Q. Do you see that?

8 A. It says: Apron; bibs, not of paper;
9 body suit; dresses; footwear; hats, jackets and
10 socks; pants; shirts, skirts; swimwear.

11 Q. Thank you. The next page, that second
12 row, it says "first use anywhere date."

13 Do you see that?

14 A. Uh-huh.

15 Q. And it's a little odd how it's done, but
16 can you read what is in the column next to that?

17 A. "At least as early as 2018."

18 Q. Thank you. You did that very well.

19 A. Thank you.

20 Q. So, I'm going to step away from the
21 documents for a second.

22 A. Okay.

23 Q. I just wanted to get those on the
24 record.

25 Next what I would like to do is, we

1 started a little bit of this, I will like to hear
2 more about you and your background.

3 A. Okay.

4 Q. So, let's start with where you went to
5 college.

6 A. I went to Florida State University.

7 Q. Okay. So, you went to Florida State.
8 What was your major?

9 A. Philosophy.

10 Q. And did you do grad school or did you
11 come right out after that?

12 A. I did graduate studies at the University
13 of South Carolina where I majored in higher education
14 administration.

15 Q. Okay. Thank you.

16 Anything beyond -- was that a master's?

17 A. It was my master's degree, yes. Many
18 years later I completed my doctorate degree in higher
19 education policy studies.

20 Q. Was that at South Carolina also?

21 A. At Florida State.

22 Q. At Florida State, okay.

23 A. Yup.

24 Q. Again, you said it was -- was it higher
25 ed?

1 A. Higher education, leadership and policy
2 studies.

3 Q. Okay. Did you work in between any of
4 the academic ventures? How was that disbursed?

5 A. Yes. I have been consistently employed
6 since 2010, full-time employed since 2010. So I
7 worked from getting my master's degree as a graduate
8 assistant at South Carolina. I then worked at
9 Valdosta State in Southern Georgia for a couple
10 years.

11 Then I came back to Florida State to
12 work in office of vice president for student affairs,
13 which is where I, while working full time, is when I
14 started my doctorate course work. Then started
15 working at the then-named Center for Leadership and
16 Social Change in 2018, which has since gone through a
17 name change and are now the Center for Leadership and
18 Service, the same department, same capacity, same
19 role that I have been in since 2018.

20 And I completed my doctorate in April of
21 2020.

22 Q. Okay. Got you.

23 So, once you completed doctorate in 2020
24 you were at FSU already, you just stayed there since
25 then?

1 A. Yeah. My work has shifted a little bit.
2 I added the blessing of teaching to my repertoire.

3 Q. Are you teaching in philosophy? What's
4 your course --

5 A. I teach a smattering as an adjunct of
6 whatever is needed. But I have taught courses in
7 social work; I have taught courses in leadership; I,
8 right now, am one week away from finishing a course
9 on the History of Higher Education in America.

10 Q. All right. When we go off the record
11 I'm going to tell you some things.

12 So, that leads us up to where we are
13 now. And what you -- I'm going to try to repeat what
14 you said before.

15 Now, your title is assistant director
16 for leadership at Florida State University?

17 A. Yes.

18 Q. Okay.

19 A. I also did -- I forget -- a three-month
20 employment that was a summer internship, but does
21 count, at George Mason University in the summer of
22 2011 in university housing.

23 Q. Okay. So, in your list -- let's start
24 with your role in 2020, in this October timeframe,
25 what were the principal things you were involved with

1 in that role in your duties?

2 A. In that role I was overseeing a couple
3 of staff members full time and graduate students. We
4 were the Leadership and Identity Team. So all of our
5 programing at that point focused on leadership
6 education, workshops, training, identity exploration,
7 identity awareness, personal values type stuff.

8 Then also our FSU vote initiative and
9 things that promoted civic engagement through civil
10 discourse, voter registration, voter education, voter
11 turnout type things. And all primarily for an
12 undergraduate student audience; although at a public
13 university sometimes we will hold things and you just
14 don't know who is going to show up.

15 Q. Okay. I understand.

16 And now in your modified title, what are
17 your duties in that role?

18 A. So as I currently now work with our
19 leadership programs, same nature and vein. I still
20 work with our civic engagement programs, that
21 includes voting and discourse or promoting
22 responsible citizenship.

23 And then I also work with some of our
24 scholarships, academic portfolio, like financial
25 scholarships and awards that we give the students. I

1 work with our marketing and communications shop. I
2 do a lot of our institutional effectiveness data
3 reporting and accountability features in our
4 department. Then I'm also our -- we jokingly refer
5 to as the "Designated Survivor," but the number two
6 for continuity within our department reporting
7 structure.

8 Q. What's that mean to be number two for
9 continuity?

10 A. If our director is not available, I
11 serve at the pleasure of our university president.

12 Q. Your immediate supervisor is who?

13 A. Is Dr. Joi Phillips, director for Center
14 for Leadership and Services. And her name is
15 spelling J-O-I.

16 Q. Director for -- what was it?

17 A. Center for Leadership and Service.

18 Q. Okay. Thank you for all of that.

19 Excluding the lawyer, meaning Kyle, have
20 you spoken to anyone else regarding this deposition
21 or any correspondence relating to this matter?

22 A. Yes.

23 Q. Okay. Who might that be, have been?

24 A. I have notified my direct supervisor,
25 Dr. Joi Phillips. I think -- I don't know how long

1 ago, but she and I check in weekly about things on
2 our plate, things that we are holding, schedules.

3 So she is aware that we are having this
4 meeting today. Then I have also shared with my
5 husband; but, otherwise, no one, no.

6 Q. Okay. In your role at the university to
7 be involved in the matter in the way that you are, as
8 a witness or a deponent, is there an approval process
9 for that or how is it that that gets signed off on?

10 A. Can you clarify in what process?

11 Q. So, let me step back, sorry.

12 How did you -- who contacted you to get
13 you involved with this particular matter?

14 A. Jessica Ekhooff.

15 Q. Okay. So, the law firm did?

16 A. Yes.

17 Q. Okay. So, it wasn't somebody at AKA,
18 the organization?

19 A. No, no.

20 Q. Okay. And when the law firm contacted
21 you, what happened after that in terms of you getting
22 involved?

23 A. I got an e-mail from Jessica asking if I
24 can share more information. I think I responded with
25 just, like, what's on our website. Our website is

1 usually still live, right, like, public -- in the
2 State of Florida we have Sunshine Laws, so we keep
3 things open and available for a long time.

4 But I think I responded to Jessica with
5 "here's what you're asking for," right? Here's this
6 event we did.

7 Then I heard nothing for a very long
8 time until my next conversation -- Jessica asking for
9 a follow-up or a meeting to ask some questions. We
10 had a meeting on Zoom, I think. Might have been on
11 the phone, virtual. And then she asked if I would be
12 comfortable signing a statement to what we discussed
13 in that meeting. And I said sure. Everything looks
14 factual and accurate to me. I signed it and returned
15 it. Then I heard nothing for multiple months, years,
16 until you all reached out to ask to schedule this
17 conversation.

18 Q. Okay. Thank you for that.

19 So I don't want to put words in your
20 mouth, but it sound like you were suggesting that the
21 law firm provided the statement for you, you read it
22 for accuracy and that you were okay with it and then
23 you signed it. Is that about right?

24 A. I think they put it in an initial Word
25 document, with places for me to put my comments into.

1 That's what I did, then signed it and returned it,
2 yes.

3 Q. So we will get to that document in a
4 minute, as you can imagine. Thank you for that.

5 I think you already said a little bit of
6 this, but I just want to confirm:

7 You have never really been employed by
8 AKA itself?

9 A. I have never at all, no.

10 Q. And have you been involved with the
11 organization as an advisor or a member?

12 A. I have not, no.

13 Q. Going back to what we were talking about
14 in terms of this process, when there was
15 communication between you and AKA's law firm, did you
16 have to go to Ms. -- Dr. Phillips and ask about the
17 appropriateness or the authorization to sign the
18 declaration, let's call it?

19 A. That, I don't recall.

20 Q. Okay.

21 A. I don't know.

22 Q. Okay. Do you have a sense that Ms.
23 Phillips conveyed the fact that this matter was now
24 something that the university through you was getting
25 involved with?

1 Do you have a sense that they conveyed
2 that to anyone else?

3 A. I don't know because I don't know the
4 degree to which we discussed it many years ago.
5 Right? If she didn't know, she couldn't have done
6 that. I don't know.

7 Q. Okay. I understand.

8 Going back to the subject that you were
9 providing testimony for as shown in that document,
10 which I think is Exhibit 2, where we have the general
11 summary of testimony subjects, do you believe that
12 you are the best person at your school to provide
13 information about that particular subject that you
14 have in the box there?

15 A. Currently, yes, I do.

16 Q. Okay. Do you believe that you are the
17 most knowledgeable person at FSU -- can I call it
18 FSU?

19 A. Yes.

20 Q. -- about use outside of the university
21 of the term "Stroll to the Polls"?

22 A. Generally, probably not. I'm sure there
23 are people that know more than I do. Specific to
24 October and that event, yes, I am currently the only
25 person who was employed then that is employed now

1 that does this work.

2 Q. Okay. Thank you. How are we doing on
3 our time? We are 45 minutes in.

4 You may have already answered this, I
5 apologize if I'm asking something I asked before:

6 When was it that you first became aware
7 of this matter that involved both AKA and STTP?

8 A. April of 2022.

9 Q. April of 2022. Okay.

10 And you became aware how again?

11 A. When I was contacted by Jessica Ekhooff.

12 Q. I was going to say that, but I didn't
13 want to put words in your mouth.

14 Let's go to -- did we enter -- let's
15 pull up four. Thank you.

16 (Exhibit STTP-4, Declaration of Erin
17 Philpot, marked for identification.)

18 Q. So, Ms. Philpot, I'm going to ask you
19 more specifically with respect to this document on
20 the page-by-page basis as opposed to the whole
21 document itself, then we are going to go back and
22 drill it down a little bit.

23 A. Okay.

24 Q. So this first page, have you seen this
25 document before?

1 A. The first page, no.

2 Q. Okay.

3 A. It's the first time.

4 Q. Okay. Let's go to the second page.

5 A. I can see it.

6 Q. Okay. Are you familiar with this page?
7 Have you seen it before?

8 A. Yes, yes, I have. Sorry, I didn't
9 realize.

10 Q. I thought you were reading, that's why I
11 didn't say anything.

12 A. Yes, I have seen this before.

13 Q. Let's go to the fourth page. Sorry for
14 the angle there.

15 A. Yes, I have seen this before.

16 Q. Okay. The sixth page?

17 A. I have seen this, yes.

18 Q. Okay. And let's -- the document starts
19 with the eighth?

20 A. Yes. I have seen all of this.

21 MR. STANBACK: Why don't you keep
22 scrolling a little bit so she can -- we can put all
23 of it in.

24 Can we go back up to the second page?

25 Q. Ms. Philpot, is that your signature to

1 the right at the bottom?

2 A. Yes, it is.

3 Q. Okay. And to the left there's a date
4 there, can you read that date?

5 A. 27th day of May 2022.

6 Q. Okay. And is that the date that you
7 actually signed this particular document?

8 A. I believe so, yes.

9 Q. Okay. And I'm asking in part because
10 I'm trying to get my timeline right because up at the
11 top it talks about you holding a position for four
12 years.

13 So, should we be counting back from 2020
14 for that four years?

15 A. No. You should be counting back from
16 May 2022. So, I started in the Assistant Director
17 for Leadership and, then named, Identity in August of
18 2018.

19 Q. Okay. Thank you for that. That clears
20 up some things for me.

21 A. Yup.

22 Q. So, we are now two years past this?

23 A. Yes.

24 Q. I would like you to look at this
25 document and let us know if there's anything that you

1 think needs to be updated based on the passage of
2 time from when it was first signed in 2022. Take
3 your time.

4 Ms. Philpot, is there anything that
5 needs to be updated or corrected or changed based on
6 your review now as opposed to 2022?

7 A. The only thing I see is that my title
8 has changed and I no longer have "and identity."
9 But, otherwise, it is still accurate and true.

10 Q. Okay. So, one question I have with
11 respect to the October 24, 2020, should I call it an
12 event or what's the terminology?

13 A. Yeah, event.

14 Q. Can you give us a little bit more
15 information about your actual role and involvement
16 for that particular event?

17 A. Sure. So for that event I helped in the
18 planning, the ideation, right, like, coming up with
19 that idea for that event, the coordination of all
20 those different partners that are listed there. And
21 then day of, I was at the event from -- I helped with
22 setup, I was there for the duration of the event,
23 then helped with breakdown.

24 Q. Okay. Was this an official event of
25 your department?

1 Was your department the main sponsor for
2 this?

3 A. Yes. It was intended to be a
4 collaboration between our department here at Florida
5 State and the Office of Fraternity/Sorority Life at
6 FAMU. And the night before the event our FAMU
7 colleagues pulled out of hosting it for fear it would
8 be a super-spreader event because of anticipated
9 large numbers of attendees and it was still COVID
10 timeframe.

11 So, while they absolutely helped in
12 planning and the lead up and promoting the event, the
13 night before they kind of said we can't, we are not
14 allowed to come tomorrow, sorry.

15 Q. So, who was left that was actually
16 involved when it came to the actual day of the event?

17 A. FSU and our office and FSU Votes, which
18 is that kind of that civic part of our office; the
19 League of Women Voters; Florida PIRG; CEEP, which is
20 what we call -- colloquially we call Campus Election
21 Engagement Project, CEEP; and the supervisor of
22 elections office was where we were going to, right,
23 like, we were strolling to the actual polling
24 precinct.

25 Q. Okay. So this includes -- if I'm

1 understanding correctly, your list here in number
2 three includes the people who actually showed up?

3 A. The people who actually showed up -- it
4 was an open event. So it was promoted widely on our
5 social media and website. The people who showed up
6 were students, we had some people from a different
7 department, campus recreation on campus that do,
8 like, recreation services kind of stuff, they showed
9 up on bikes to roll to the polls.

10 Q. Okay.

11 A. Student leaders, student attendees who
12 actually attended came to the event.

13 Q. Let me clarify: What I was asking who
14 showed up, I was talking about the organizations.

15 You're saying some people bowed out?

16 A. Yes.

17 Q. So, there are other organizations that
18 might have been involved, but they are not on this
19 list because they did not actually make a presence?

20 A. Yes. They weren't responsible for
21 hosting it, planning it, coordinating it. But, yeah,
22 tons of different groups showed up. I shouldn't say
23 "tons." Different groups showed up.

24 Q. Thank you for that.

25 Earlier, you can tell me if I'm

1 paraphrasing you incorrectly, it sounded like you
2 received a document in Word that had some blanks in
3 it. At the end of the day it turned into this
4 document. Is that correct?

5 A. Correct.

6 Q. Okay. So, to the best that you can
7 recall, which parts of this did you, yourself,
8 independently include into the document?

9 A. I don't know exactly.

10 Q. Okay. We can break it down.

11 So paragraph one, would that be all you?

12 A. I mean, it's all true, whether I'm the
13 one that wrote it or not, I don't know. I can't
14 recall to what degree -- I remember receiving an
15 e-mail document that had highlights in it that said
16 bracketed, like, fill this, add in here, accept or
17 not, you know. I don't remember what part of the
18 page it was on, how much at all.

19 Q. Okay. I understand, but I still want to
20 go through on a paragraph-by-paragraph basis.

21 What about paragraph two?

22 A. I'm not sure.

23 Q. Okay. What about paragraph three?

24 A. I am not certain, but that seems very
25 much me.

1 Q. Okay. I'm going to skip four through
2 six.

3 What about paragraph seven?

4 A. I'm not sure.

5 Q. Okay. Thank you. Sorry to stretch your
6 brain like that.

7 A. That's okay.

8 MR. STANBACK: Have we entered Exhibit 4
9 into the record?

10 Q. Just to confirm, looking at this
11 document now, would you be willing to sign it again
12 based on the information that's here if it was going
13 to be put in front of you with today's date, with the
14 only change being the removal of the ampersand and
15 "the identity"?

16 A. Yes. It's all still true and I would
17 sign it today, yes.

18 Q. Okay. Thank you.

19 So, can you elaborate on paragraph seven
20 with respect to your belief about Stroll to the
21 Polls, and what is the basis of that belief?

22 A. Sure. I believe the phrase "Stroll to
23 the Polls" is a commonplace political slogan and not
24 an indicator that it comes from a single person or
25 entity. I believe that it is commonplace.

1 In my work with civic engagement and
2 voting and voter registration and voter turn out,
3 there are lots of phrases that we commonly use and
4 like, you know, swap around, especially in the
5 college higher education context, all under the
6 common effort of promoting voting, getting people to
7 the polls to exercise their democratic right and
8 voice.

9 And "Stroll to the Polls" is something
10 that I have heard multiple times over the years, in
11 this work and prior to that, of a way to kind of get
12 mobilizing and get people to go to the polls. It's
13 often associated with a group of people walking
14 together to the polls as, like, a concentrated voter
15 turnout effort.

16 Q. Okay. Can you give me some examples of
17 other entities that you might remember that use it in
18 connection with -- sounds like I can characterize it
19 as a campaign?

20 A. Yeah. Slogans, groups, yeah. So I
21 think the thing that comes to mind for me is, this is
22 like way dating me back a little bit, but March of
23 Dimes, right, when they march to draw attention to
24 efforts of a particular cause or platform.

25 I also, from having worked in

1 Fraternity/Sorority Life for a number of years, know
2 that a lot of NPHC groups mobilize their voters, like
3 their members through strolling to the polls in a
4 different context, of, like, stepping and strolling
5 and things that are culturally relevant and salient
6 for those NPHC groups.

7 We picked it because that's what we were
8 doing and so it was something for us, it was just
9 meant to be cutesy and try to be a fun thing because,
10 historically, we had used the phrase "Noles to the
11 Polls" because at Florida State we are the Seminoles,
12 so our effort for voter turnout is a play-off of
13 Stroll to the Polls, but has always been branded for
14 us of "Noles to the Polls."

15 So, that campaign that we had done for a
16 number of years was driving people to the polls.
17 Anybody could sign up and we would show up at their
18 doorstep and take them to the polls.

19 And we couldn't do that in the height of
20 COVID. We weren't comfortable putting people in
21 cars, masked or unmasked, vaccinated or not
22 vaccinated. It's a hard no. We are not doing it.
23 So, instead we said what can we do outside? If we
24 have to be outside in masks, we can walk ten feet
25 apart to the polls. And that is not catchy, "Walking

1 Ten Feet Apart to the Polls."

2 "Stroll to the Polls" is catchy. So
3 that's what we picked.

4 Q. I'm following you. For this event --
5 let's move to Exhibit 1 of your declaration. I think
6 I recognize "Converse."

7 A. Yes, that's what we were going for. But
8 not specific enough.

9 Q. Can you tell me a little bit about the
10 creation -- for this one and the next one, sounds
11 like -- looks like they are about the same, creation
12 of those particular fliers let's call them.

13 A. Sure. This is actually a sticker that
14 was, I don't know, maybe two-inches-by-four-inches
15 sticker, multicolored. I may still have one in the
16 drawer here. This was created by our in-house
17 graphic designer at the time, that hand drew this
18 artwork, turned it into a sticker.

19 Students in college, then and now, are
20 wild about stickers for some reason. And so we -- we
21 use stickers a lot in our programing to promote it
22 and then also to give them out to students when they
23 come to a program. So we tried to use it specific to
24 this event with the date on it because we handed out
25 ahead of time in hopes it would also serve as a

1 reminder to people to vote. We know that remembering
2 to vote is a big barrier for a lot of people. They
3 think they are going to have more time than they
4 actually do. They trust their future selves way too
5 much. So that's part of our promotion to get people
6 to come.

7 Q. Do you recall how far out in advance you
8 started promoting the actual event?

9 A. No, I do not.

10 Q. Do you think it was before June of --
11 like June 20th of 2020?

12 A. I can almost guarantee it was not before
13 June of 2020 because of the academic calendar cycle.
14 We, maybe, would have had ideas for what typically
15 would have been Noles to the Polls, right, that we do
16 every single time. There's a primary or a general or
17 local election.

18 But in 2020, in Fall of 2020, things
19 were evolving so much around what university policy
20 was: Are we allowed to gather? How many people can
21 gather? Can you be indoors or outdoors? Does
22 everybody have to be masked?

23 We were having so much COVID response
24 that things were not planned out in a lot of advance
25 notice because the parameters were changing so

1 frequently.

2 Q. Okay. So with that as a backdrop, do
3 you have a sense of when the decision was made to go
4 from "Noles" to "Strolls"?

5 A. With an October date, I would say
6 sometime between early August and early October.

7 Q. Okay. I got you.

8 So, I'm going to move to, Mr. Johnson,
9 to the second exhibit here. We said the first
10 exhibit is stickers. Right?

11 A. Yes, that's stickers.

12 Q. What was the second exhibit?

13 A. Second exhibit is a social media square
14 for posting on Instagram.

15 Q. Okay. Was it only on Instagram?

16 A. I believe so. But once you put stuff
17 out on Instagram, it can go anywhere. We only ever
18 used it on Instagram.

19 Q. At this particular time, did you have
20 someone who was responsible for your social media in
21 particular or was that -- how did that work? I
22 should ask it that way.

23 A. Yes. Our marketing staff member, I have
24 no idea what her title would have been in 2020,
25 handles all of our marketing and promotion and

1 outreach efforts.

2 Q. Okay. Now, would that same person be
3 the person that was looking at what other people were
4 doing in social media or would that be a totally
5 separate person?

6 A. No, our marketing office is in-house and
7 so their only job is to take our ideas as the
8 programmers and turn them into artwork or posts or
9 promo items or whatever.

10 Q. Okay. For something like this, do you
11 have a recollection -- you said it was the
12 in-house --

13 A. Marketing, yeah.

14 Q. -- graphic designer --

15 A. Yes.

16 Q. -- who would come up with this?

17 What would be the process in terms of --
18 that person would come up with a sketch and bring it
19 to a group or to you individually or how do they get
20 finalized?

21 A. They would usually come up with initial
22 design sketch, initial concept artwork is what we
23 call it. They would bring it to our group that was
24 wanting it, which would have been our FSU Votes, kind
25 of, coalition, or group of folks that we mentioned

1 previously that were hosting this event. And we
2 would have given feedback, maybe. Or we would have
3 just said "love it, print it."

4 I don't remember the degree to which
5 there was any back and forth or feedback or multiple
6 drafts at all.

7 Then they would have been -- the
8 marketing staff would have been responsible for
9 actually doing the print and if there was any, like,
10 dye cutting or something of an item, they do that
11 too.

12 Q. Okay. And was that group involved in
13 the change from "Noles" to "Strolls" or was that just
14 internal at FSU? Meaning, if I remember correctly,
15 there was a multitude of groups that were involved,
16 but "Noles" was specific to you.

17 So I'm trying to understand, did the
18 other groups get involved in the decision to go to
19 "Strolls"?

20 A. Great question.

21 So, the chronological sequence of things
22 would have been that FSU had to follow FSU's COVID
23 guidelines at that point. That took "Noles to the
24 Polls" and driving off the table. To not create
25 confusion and protect that name, we went to "Stroll

1 to the Polls" as an FSU effort. But our FSU votes
2 coalition has all those entities that are listed in
3 our coalition. So, all those folks, with the
4 exception of FAMU, were at the table to help make
5 that decision.

6 Once we then knew it's "Stroll to the
7 Polls," then all of a sudden we thought let's see if
8 FAMU wants to join us, they're probably going to be
9 doing something. Let's make it bigger. Because our
10 campuses, geographically, are less than a mile away
11 from each other.

12 Q. So FAMU was brought in later in time?

13 A. Yes, later in time when we said we're
14 doing this "Stroll to the Polls" thing, are you all
15 doing a get-out-the-vote effort? Let's do it the
16 same day. Because this date, specifically October
17 24th, was early voting day, a concentrated effort as
18 set by supervisor of elections and maybe even, I
19 don't know who picks it, somebody above us picks it.
20 The whole country does early voting day on this day.

21 Q. I think you talked about it a little
22 bit, but I want to make sure I understand exactly
23 what was going on that day.

24 So, where was it held?

25 A. The plan was that it would be held --

1 FSU contingency would meet at Westcott Plaza, which
2 is our main admin building, the gate for our campus.
3 We would walk to the early voting precinct.

4 Q. Okay.

5 A. Which was point seven miles, if I
6 remember correctly, east.

7 Q. Okay.

8 A. FAMU would meet on their campus at their
9 main admin building and they would walk west to meet
10 in the same place. Then we would have kind of, like,
11 this celebratory outside the polling precinct
12 solicitation line. We would have kind of the, you
13 know, hyped-up, give people water if they're in line
14 or have there be music to celebrate first-time
15 voters, and make it fun and exciting and memorable.
16 Then we would walk home.

17 Q. Okay. So as part of that, was there any
18 clothing that was provided or worn that had "Stroll
19 to the Polls" on it?

20 A. No.

21 Q. And, so, we have these two pieces of
22 art: the sticker and the web piece.

23 Were there, like, posters or anything
24 else that were out there that were used to kind of
25 brand the event, let's call it?

1 A. No.

2 Q. Okay. Just an aside, do you think it
3 was a success?

4 A. No.

5 Q. No? After all this?

6 Why do you think that was -- that was
7 just a side question.

8 Why do you think it was not a success?

9 A. Sure. I don't think it was a success
10 because of attendance, it was not well attended,
11 which was the greater irony, right, that we lost a
12 partner the night before because of fear it would be
13 a super-spreader event, which in 2020 was usually
14 like hundreds of people would equal the definition of
15 super spreader. In, totality, we maybe had 15
16 students that joined us that day. By comparison, for
17 success in my definition, Noles to the Polls, we
18 usually take hundreds. So 15 would have not been a
19 successful event to me.

20 Q. I understand. But we also had COVID.

21 A. Exactly. Exactly. And so many students
22 were doing vote by mail and were not physically
23 comfortable going to the polls, period.

24 Q. Okay. The promotion of this was the
25 stickers and the social media.

1 Was there any other promotional --

2 A. The website.

3 Q. The website?

4 A. Yeah, which is that last Exhibit 3.

5 Q. Okay. You're teeing that up for me,
6 thank you. So let's move to that.

7 So, tell me about the website and kind
8 of who curated that and this kind of aspects of it in
9 that way?

10 A. The website is also something that is
11 in-house designed and in-house controlled, I guess,
12 right? Like we use live web editing in our office
13 with our marketing team. And it is super customary
14 for any of our programs and events that we have a
15 website that has event information, especially for
16 this event information where there were, like, event
17 logistics, like routes that we were walking and
18 things we need to bring to vote. You needed photo
19 ID. At that point it was required that if we were
20 coming together in person we have to wear masks by
21 the university.

22 So we absolutely would have had a
23 website that had lots of content.

24 Q. Okay. You have a sense of when the
25 website -- this particular page or these pages were

1 published for public consumption?

2 A. No.

3 Q. So, we talked about decision was made
4 possibly as early as August to go with "Strolls" as
5 opposed to "Noles," but as late as possibly October?

6 A. Yeah. The website would have come
7 sometime, like, September, October.

8 Q. Okay. Again, for the website, it's the
9 same group of people who would have signed off on the
10 stickers and the social media posting, they would
11 sign off on all the elements of the website, meaning
12 the text also?

13 A. They would have -- website we probably
14 would have not given that minutia of details to that
15 many people. Probably just me, staff member at the
16 time, who no longer works here, that worked with
17 voting and our marketing staff.

18 Q. Okay. And to be clear, you may have
19 already said this, the intended audience for the
20 stickers, Instagram and the website were who?

21 A. Intended audience is always primarily
22 students, but when we hold big events like this that
23 are applicable, we open it up to faculty, staff,
24 community members. We're never going to turn someone
25 away if we're allowed to have an open event.

1 Sometimes there are events we can only
2 allow students to attend, then we are very clear to
3 promote that. But for this kind of thing, it was get
4 as many people to exercise their right to vote as
5 possible. Anybody, come one, come all, don't matter.

6 Q. Sorry. Go ahead.

7 A. Anybody could come.

8 Q. Do you do something different in terms
9 of putting it out there, let's call it, if it's open
10 to the public? Or is it the same thing, just a
11 matter of the wording inside of -- okay, so everybody
12 sees the same thing?

13 A. Yes.

14 Q. You don't do a blast to a different
15 group of people?

16 A. No. We're just very clear. Usually
17 things that are closed to only students, we're clear
18 to denote "your FSU card is required," meaning, like,
19 you're going to have to swipe in. If you don't have
20 an FSU card, we will turn you away. Or we say "apply
21 via this link," so that we can confirm they are a
22 students and not invite anyone that's not a student
23 to attend.

24 Q. Ms. Philpot, with respect to "Stroll to
25 the Polls," it sounds like there was no clothing

1 aspect, I will say, with respect to this particular
2 event.

3 Do you know of any clothing that FSU may
4 have had at any time that had these terms on that
5 clothing?

6 A. I do not know of any ever, no.

7 Q. Okay. I will move along. I will go to
8 Exhibit 5.

9 MR. STANBACK: Did we enter this?

10 MS. EKHOFF: Before we move onto the
11 next exhibit, would you mind taking a five-minute
12 break?

13 MR. STANBACK: I would not mind at all.

14 MS. EKHOFF: Okay. Great. Thank you.

15 (Break in proceedings.)

16 (Exhibit STTP-5, FaceBook posts, were
17 marked.)

18 Q. Ms. Philpot, I think I only have one
19 other question about the exhibits and that event.

20 So this is October 24, 2020 event,
21 Stroll to the Polls. Was that terminology used any
22 time after that for any other events or any other
23 purposes?

24 A. So, we have not had any other events
25 that use that terminology. But also this is, like

1 right now, this fall will be our next cycle of an
2 election in which we would have had a reason to use
3 it. Right? The only -- so, no, we did not use it.
4 But I want to be incredibly clear, when we give
5 students stickers, those students usually last for
6 four or five years for us, so we see it still. We
7 have not used it. We don't plan to use it again for
8 this year. We're back to "Noles to the Polls" and I
9 still see the stickers.

10 Q. Thank you. So, that means you're going
11 to be driving this time?

12 A. Uh-huh.

13 Q. Okay. We entered this one. I would
14 like to move to Exhibit 5.

15 Ms. Philpot, I will let you know, I'm
16 representing that Exhibit 5, pages 1 through 4, are
17 some FaceBook posts that the applicant put up around
18 the same timeframe.

19 MR. STANBACK: Why don't you go back up
20 to the first page, Mr. Johnson.

21 Q. I'll represent to you that these were at
22 least somewhat focused on Florida.

23 A. Okay.

24 Q. So, I will let you peruse that.

25 My question is going to be really, is

1 this something that you were familiar with at the
2 time when you were doing your event; or if, as you
3 were trying to find people to collaborate with or
4 coordinate with, if anything like this was -- came
5 into your view?

6 A. No.

7 MR. STANBACK: Mr. Johnson, do you want
8 to scroll through?

9 A. No. I have never seen any of these
10 before.

11 Q. Okay. Do you have a recollection at the
12 time of 2020 about any other people besides your
13 group that were working in this same space for, let's
14 call it, voter engagement, that were using a similar
15 terminology?

16 A. Not in 2020, no.

17 Q. Okay. And I want to try to paraphrase
18 what you said before.

19 Your marketing people were more pushing
20 out than taking in, in terms of information that was
21 on the web and Instagram and FaceBook?

22 A. Yeah. They are one stop -- their only
23 intake of information is what they might consume as
24 an individual and definitely not four days before an
25 event.

1 Q. Got you.

2 MR. STANBACK: Jessica, if you don't
3 mind, I would like to make sure that Mr. Johnson
4 doesn't have any questions that he might have that I
5 have not -- that I should have asked and didn't.

6 MS. EKHOFF: That's fine.

7 MR. JOHNSON: I appreciate that. I do
8 not have any additional questions.

9 MR. STANBACK: Okay. Ms. Philpot, do
10 you have any questions?

11 THE WITNESS: I don't think so.

12 MS. EKHOFF: Can I have a few questions,
13 actually?

14 MR. STANBACK: Sorry, Jessica. I should
15 have handed it over to you.

16 CROSS-EXAMINATION BY MS. EKHOFF:

17 Q. Dr. Philpot, I believe you testified
18 that you're aware that the March of Dimes and some of
19 the national Pan-Hellenic Council organizations have
20 used the phrase "Stroll to the Polls." Is that
21 right?

22 A. Yes.

23 Q. Are you aware of any other organizations
24 that use or have used the phrase "Stroll to the
25 Polls" in the past?

1 A. For specific, no. But general, it's
2 really common on college campuses, especially with
3 NPHC groups, NPHC council. Again, like I said, the
4 stepping and strolling to the polls and making it
5 something that is voting promotion, but also like a
6 community event. Right? Something that -- I know
7 that I have seen or experienced it on other college
8 campuses before.

9 Q. You're just not sure exactly which
10 college campuses?

11 A. Yeah. No idea. Yeah.

12 Q. Understood.

13 MS. EKHOFF: Thank you. No further
14 questions.

15 MR. STANBACK: Okay. So I want to
16 apologize for not calling you Dr. Philpot.

17 THE WITNESS: That's okay.

18 MR. STANBACK: Jessica was trying to
19 make me look bad.

20 Patty, we can go off the record I think.

21 (Discussion held off the record.)

22 MS. EKHOFF: Patty, we would like to
23 order a copy of the transcript, please.

24 THE COURT REPORTER: Mini, regular or
25 both?

1 MS. EKHOFF: Regular is fine.

2 MR. STANBACK: Thank you. Mini and

3 regular.

4 (Concluded at 4:37 p.m.)

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CERTIFICATE OF DEPONENT

I have read the foregoing transcript of
my deposition and except for any corrections or
changes noted on the errata sheet, I hereby
subscribe to the transcript as an accurate record
of the statements made by me.

DR. ERIN SYLVESTER PHILPOT

SUBSCRIBED AND SWORN before and to me
this ____ day of _____, 20____.

NOTARY PUBLIC

My Commission expires:

CERTIFICATE

I, PATRICIA SMITH, a Notary Public and
Certified Court Reporter of the State of New Jersey,
License No. 30X100103000, do hereby certify that
prior to the commencement of the examination, DR.
ERIN SYLVESTER PHILPOT was duly sworn by me to
testify the truth, the whole truth and nothing but
the truth.

I DO FURTHER CERTIFY that the foregoing is a
true and accurate transcript of the testimony as
taken stenographically by and before me at the time,
place and on the date hereinbefore set forth.

I DO FURTHER CERTIFY that I am neither a
relative nor employee nor attorney nor counsel of any
of the parties to this action, and that I am neither
a relative nor employee of such attorney or counsel,
and that I am not financially interested in the
action.

A handwritten signature in black ink that reads "Patricia Smith". The signature is written in a cursive, flowing style.

Patricia Smith, CCR

Dated: August 2, 2024

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DATE OF DEPOSITION: 7/26/2024
WITNESSES' NAME: Dr. Erin Sylvester Philpot

PAGE	LINE (S)	CHANGE	REASON
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Dr. Erin Sylvester Philpot

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MY COMMISSION EXPIRES:

&	2022 29:8,9	7	43:9 53:13
& 2:3 4:13 16:21	31:5,16 32:2,6	7 9:1	add 35:16
0	2024 1:20	7/26/2024 58:3	added 22:2
08608 2:10	57:24	9	additional 53:8
1	20th 13:13	90/012 1:3	address 4:17,20
1 3:9 13:17,18 39:5 51:16	40:11	91267937 1:3	adjunct 22:5
103 2:9	24 32:11 50:20	9276 57:22	admin 45:2,9
12/30 9:1	24th 44:17	a	administration 20:14
13 3:9,10	26 1:20	ability 8:8	advance 40:7
15 46:15,18	27th 31:5	able 5:24 10:14 16:15	40:24
18 3:11	29 3:12	above 1:16 44:19	advisor 12:6 27:11
2	2900 2:5	absolutely 33:11 47:22	affairs 21:12
2 3:10 13:21,22 17:25 28:10 57:24	3	absorb 14:4	affiliated 11:7
20 18:16 56:13 58:22	3 3:11 18:1 47:4	academic 4:23 21:4 23:24 40:13	ago 25:1 28:4
200 2:4	30x100103000 57:5	accept 35:16	agree 7:9
2010 21:6,6	32303 4:25	accountability 24:3	ahead 4:18 39:25 49:6
2011 22:22	36 2:9	accuracy 26:22	aka 2:6 10:7,7 10:22 14:10,16 25:17 27:8 29:7 58:2
2012 11:2,13	3:05 1:20	accurate 15:4 26:14 32:9 56:6 57:11	aka's 27:15
2014 11:2,6,13	4	action 57:16,19	allow 49:2
2018 19:17 21:16,19 31:18	4 3:4,12 29:16 36:8 51:16	activities 11:16	allowed 33:14 40:20 48:25
2020 13:13 17:7 18:16 21:21,23 22:24 31:13 32:11 40:11,13,18,18 41:24 46:13 50:20 52:12,16	428 1:3	actual 32:15 33:16,23 40:8	alonzo 2:7,8 4:5
	45 29:3	actually 15:6 31:7 33:15 34:2,3,12,19 39:13 40:4	alpha 1:7,7 4:13,14 10:2,3 10:7,12,13 11:4,4,10,10
	4:37 55:4		america 22:9
	5		
	5 3:13 50:8,16 51:14,16		
	50 3:13		
	6		
	60606 2:5		
	614 4:24		

ampersand 36:14 angle 30:14 answered 29:4 answers 6:7 8:1 8:5 anticipated 33:8 anybody 38:17 49:5,7 apart 38:25 39:1 apologize 29:5 54:16 appeal 1:2 9:19 9:22 14:12 applicable 48:23 applicant 4:7 12:18 14:19 19:2 51:17 application 3:11 18:1,7 apply 49:20 applying 12:23 appreciate 8:11 53:7 appropriaten... 27:17 approval 25:8 april 21:20 29:8,9 apron 19:8 art 45:22	artwork 39:18 42:8,22 aside 46:2 asked 7:3 26:11 29:5 53:5 asking 5:19 25:23 26:5,8 29:5 31:9 34:13 aspect 50:1 aspects 47:8 assist 12:13 assistant 15:18 21:8 22:15 31:16 associated 16:19 37:13 assume 9:14 12:22 attend 49:2,23 attendance 46:10 attended 34:12 46:10 attendees 33:9 34:11 attention 37:23 attorney 5:22 57:15,17 attorneys 2:6 2:10 audience 23:12 48:19,21 august 31:17 41:6 48:4	57:24 authorization 27:17 available 24:10 26:3 awards 23:25 aware 25:3 29:6,10 53:18 53:23 awareness 23:7 b b 3:7 back 12:16 15:25 16:5 18:21 21:11 25:11 27:13 28:8 29:21 30:24 31:13,15 37:22 43:5 51:8,19 backdrop 41:2 background 20:2 bad 54:19 ball 5:7 barrier 40:2 based 5:19 8:24 32:1,5 36:12 basically 7:22 basis 17:3 29:20 35:20 36:21 belief 36:20,21 believe 10:13 17:10 28:11,16	31:8 36:22,25 41:16 53:17 best 6:6,7 28:12 35:6 better 9:4 beyond 20:16 bibs 19:8 big 40:2 48:22 bigger 44:9 bikes 34:9 bit 5:7 9:6 15:25 20:1 22:1 27:5 29:22 30:22 32:14 37:22 39:9 44:22 blanks 35:2 blast 49:14 blessing 22:2 block 14:24 board 1:2 9:19 9:22 14:12 body 19:9 bottom 31:1 bouncing 5:7 bowed 34:15 box 15:14 16:5 16:16,18 28:14 bracketed 35:16 brain 36:6 brand 45:25 branded 38:13 break 7:1,1,3 35:10 50:12,15
---	---	--	--

breakdown 32:23 bring 17:19 42:18,23 47:18 brought 44:12 building 45:2,9	catchy 38:25 39:2 cause 37:24 ccr 57:23 ceep 33:19,21 celebrate 45:14 celebratory 45:11 center 21:15,17 24:13,17 certain 35:24 certificate 56:1 57:1 certified 1:17 57:4 certify 57:5,10 57:14 challenging 5:23 change 21:16 21:17 36:14 43:13 58:5 changed 32:5,8 changes 56:5 changing 40:25 chapters 11:5 11:10 characterize 37:18 check 25:1 chicago 2:5 chronological 43:21 citizenship 23:22	civic 23:9,20 33:18 37:1 civil 23:9 clarify 6:5,21 25:10 34:13 cleanest 6:24 clear 48:18 49:2,16,17 51:4 clears 31:19 client 5:22 closed 49:17 clothing 45:18 49:25 50:3,5 coalition 42:25 44:2,3 collaborate 52:3 collaboration 33:4 colleagues 33:7 college 20:5 37:5 39:19 54:2,7,10 colloquially 33:20 column 16:2,2 18:23 19:5,16 come 20:11 33:14 39:23 40:6 42:16,18 42:21 48:6 49:5,5,7 comes 36:24 37:21	comfortable 26:12 38:20 46:23 coming 32:18 47:20 commencem... 57:6 commencing 1:20 comments 26:25 commission 56:20 58:25 common 37:6 54:2 commonly 37:3 commonplace 36:23,25 communication 27:15 communicati... 24:1 community 48:24 54:6 comparison 46:16 complete 8:4 completed 20:18 21:20,23 concentrated 37:14 44:17 concept 42:22 concluded 55:4 confirm 27:6 36:10 49:21
---	--	---	--

confusion 43:25 connection 37:18 consistently 21:5 consume 52:23 consumption 48:1 contacted 25:12,20 29:11 content 47:23 context 5:12 37:5 38:4 contingency 45:1 continuity 24:6 24:9 controlled 47:11 controlling 8:13 convenience 16:17 conversation 5:20 6:16 26:8 26:17 converse 39:6 conveyed 27:23 28:1 coordinate 52:4 coordinating 34:21	coordination 32:19 copies 8:20 copy 8:17 54:23 corner 10:2 13:7 correct 15:12 35:4,5 corrected 32:5 corrections 56:4 correctly 34:1 43:14 45:6 correspondeen... 24:21 council 53:19 54:3 counsel 14:10 57:15,17 count 22:21 counting 31:13 31:15 country 44:20 county 16:24 couple 5:5 8:22 15:21 21:9 23:2 course 7:23 8:3 21:14 22:4,8 courses 22:6,7 court 54:24 57:4 courtroom 7:23	covid 33:9 38:20 40:23 43:22 46:20 create 43:24 created 39:16 creation 39:10 39:11 cross 3:2 53:16 culturally 38:5 curated 47:8 curiosity 15:20 current 15:3 currently 4:25 23:18 28:15,24 customary 47:13 cutesy 38:9 cutting 43:10 cycle 40:13 51:1	56:13 58:22 days 52:24 decision 41:3 43:18 44:5 48:3 declaration 3:12 27:18 29:16 39:5 defendant 1:11 definitely 52:24 definition 46:14,17 degree 20:17 20:18 21:7 28:4 35:14 43:4 democratic 37:7 denote 49:18 department 21:18 24:4,6 32:25 33:1,4 34:7 deponent 25:8 56:1 deposed 7:17 deposition 1:7 3:9 5:12 12:16 13:18 24:20 56:4 58:3 description 3:8 design 42:22 designated 24:5
		d	
		d 2:8 11:24 data 24:2 date 13:9,12 18:19 19:12 31:3,4,6 36:13 39:24 41:5 44:16 57:13 58:3 dated 57:24 dating 37:22 day 31:5 32:21 33:16 35:3 44:16,17,20,20 44:23 46:16	

designed 47:11 designer 39:17 42:14 desk 15:7,11,13 details 48:14 development 12:13 different 11:9 32:20 34:6,22 34:23 38:4 49:8,14 dimes 37:23 53:18 direct 3:2 4:3 15:8 24:24 director 15:18 22:15 24:10,13 24:16 31:16 disbursed 21:4 disclosures 3:10 13:22 discourse 23:10 23:21 discussed 26:12 28:4 discussion 54:21 disrespect 6:23 doctorate 20:18 21:14,20 21:23 document 9:6 9:13,15 13:6 14:5,10 17:19 18:4,17 26:25	27:3 28:9 29:19,21,25 30:18 31:7,25 35:2,4,8,15 36:11 documents 8:8 8:12,18,19 19:21 doing 5:14 9:23 11:11 12:5 29:2 38:8,22 42:4 43:9 44:9 44:14,15 46:22 52:2 doorstep 38:18 dr 1:8 3:3 4:1 24:13,25 27:16 53:17 54:16 56:10 57:6 58:3,21 drafts 43:6 draw 37:23 drawer 39:16 dresses 19:9 drew 39:17 drill 29:22 drive 2:4 driving 38:16 43:24 51:11 duly 4:1 57:7 duration 32:22 duties 23:1,17 dye 43:10	e e 2:1,1 3:7 9:1 25:23 35:15 earlier 34:25 early 19:17 41:6,6 44:17 44:20 45:3 48:4 easier 5:13 east 45:6 ed 20:25 editing 47:12 education 20:13,19 21:1 22:9 23:6,10 37:5 effectiveness 24:2 efficient 5:10 effort 37:6,15 38:12 44:1,15 44:17 efforts 18:8 37:24 42:1 eighth 30:19 ekhoff 2:4 4:11 4:11 7:12 17:21 25:14 29:11 50:10,14 53:6,12,16 54:13,22 55:1 elaborate 36:19 election 16:23 17:7 33:20 40:17 51:2	elections 16:24 33:22 44:18 elements 48:11 employed 21:5 21:6 27:7 28:25,25 employee 12:7 57:15,17 employment 22:20 engagement 16:23 23:9,20 33:21 37:1 52:14 enter 13:17 17:23 29:14 50:9 entered 13:16 17:21,25 36:8 51:13 entities 37:17 44:2 entitled 1:16 entity 36:25 equal 46:14 erin 1:8 3:3,12 4:1,21 29:16 56:10 57:7 58:3,21 errata 56:5 58:1 especially 5:14 37:4 47:15 54:2
---	---	---	--

esq 2:4,8,8 event 17:6,8,8 26:6 28:24 32:12,13,16,17 32:19,21,22,24 33:6,8,12,16 34:4,12 39:4 39:24 40:8 43:1 45:25 46:13,19 47:15 47:16,16 48:25 50:2,19,20 52:2,25 54:6 events 47:14 48:22 49:1 50:22,24 everybody 40:22 49:11 evolving 40:19 exactly 35:9 44:22 46:21,21 54:9 examination 4:3 53:16 57:6 examples 37:16 except 56:4 exception 44:4 exciting 45:15 excluding 24:19 exercise 37:7 49:4 exhibit 10:1 13:17,18,21,21 13:22 17:22,25	18:1 28:10 29:16 36:8 39:5 41:9,10 41:12,13 47:4 50:8,11,16 51:14,16 exhibits 9:2 50:19 expectations 12:11 experienced 54:7 expires 56:20 58:25 exploration 23:6 extent 5:18	feel 6:4 feet 38:24 39:1 filed 13:10 14:10 18:8,16 fill 35:16 finalized 42:20 financial 23:24 financially 57:18 find 52:3 fine 53:6 55:1 finishing 22:8 firm 4:12 25:15 25:20 26:21 27:15 first 4:1 14:8 14:24 15:1 19:12 29:6,24 30:1,3 32:2 41:9 45:14 51:20 five 50:11 51:6 fliers 39:12 florida 4:25 5:1 11:20 16:21,21 16:22 20:6,7 20:21,22 21:11 22:16 26:2 33:4,19 38:11 51:22 focus 14:21 focused 23:5 51:22 folks 42:25 44:3	follow 5:6 26:9 43:22 following 39:4 follows 4:2 footwear 19:9 foregoing 56:3 57:10 forget 22:19 formal 4:9 forth 43:5 57:13 four 29:15 31:11,14 36:1 39:14 51:6 52:24 fourth 30:13 fraternity 11:3 11:17 33:5 38:1 free 6:4 frequently 41:1 friday 1:20 friends 11:9 front 15:7,11 15:13 36:13 fsu 21:24 23:8 28:17,18 33:17 33:17 42:24 43:14,22 44:1 44:1 45:1 49:18,20 50:3 fsu's 43:22 full 4:19 21:6 21:13 23:3
	f		
	facebook 3:13 50:16 51:17 52:21 fact 27:23 factual 26:14 faculty 48:23 fall 40:18 51:1 familiar 30:6 52:1 famu 33:6,6 44:4,8,12 45:8 far 40:7 fear 33:7 46:12 features 24:3 feedback 43:2 43:5		

fun 38:9 45:15 functionally 4:22 further 18:14 54:13 57:10,14 future 40:4	16:5,12 22:10 27:16 29:14,21 30:4,13,24 35:20 37:12 41:3,17 43:18 48:4 49:6 50:7 51:19 54:20	groups 17:4 34:22,23 37:20 38:2,6 43:15 43:18 54:3 guarantee 40:12 guess 47:11 guidelines 16:14 43:23	helped 32:17 32:21,23 33:11 helping 9:23 hereinbefore 57:13 higher 20:13,18 20:24 21:1 22:9 37:5 highlights 35:15 hilliard 2:3 4:13 historically 38:10 history 22:9 hold 23:13 48:22 holding 25:2 31:11 home 45:16 hopefully 5:6 hopes 39:25 hosting 33:7 34:21 43:1 hours 8:22 house 39:16 42:6,12 47:11 47:11 housekeeping 7:14 housing 22:22 huh 6:17 12:19 14:20 15:2 19:14 51:12
g	going 5:4,12 8:7 12:16 17:2 17:17 19:20 22:11,13 23:14 27:13 28:8 29:12,18,21 33:22 36:1,12 39:7 40:3 41:8 44:8,23 46:23 48:24 49:19 51:10,25	h	
gate 45:2 gather 40:20,21 general 16:10 16:16 17:1,7 28:10 40:16 54:1 generally 28:22 geographically 44:10 george 22:21 georgia 11:25 21:9 geraldson 2:3 4:13 getting 10:23 13:3 21:7 25:21 27:24 37:6 give 4:17 15:7 16:4 23:25 32:14 37:16 39:22 45:13 51:4 given 7:17 43:2 48:14 giving 14:3 go 4:18 5:4 6:20 13:20	good 12:12 goods 19:1,4 grad 20:10 graduate 20:12 21:7 23:3 graphic 39:17 42:14 great 43:20 50:14 greater 46:11 greek 11:8,18 group 12:22 37:13 42:19,23 42:25 43:12 48:9 49:15 52:13	h 3:7 hand 10:2 13:7 18:22 19:5 39:17 handed 39:24 53:15 handles 41:25 happen 11:9 happened 11:7 25:21 hard 38:22 hats 19:9 head 6:17 15:9 heading 16:2,8 hear 6:22 14:14 20:1 heard 9:11 26:7 26:15 37:10 height 38:19 held 1:19 17:6 44:24,25 54:21 hellenic 11:8 53:19 help 12:10,11 44:4	

hundreds 46:14,18 husband 25:5 hyped 45:13	incredibly 51:4 independently 35:8 index 3:1 indicator 36:24 individual 52:24 individually 42:19 indoors 40:21 information 5:23 6:1 15:3 15:12 25:24 28:13 32:15 36:12 47:15,16 52:20,23 initial 26:24 42:21,22 initiative 23:8 inside 49:11 instagram 41:14,15,17,18 48:20 52:21 institutional 24:2 instructional 5:5 instructions 5:8 7:6 intake 11:5 52:23 intended 33:3 48:19,21 interaction 10:22 11:1	interactions 12:2 interest 12:24 interested 57:18 internal 43:14 internship 22:20 introduction 4:9 invite 49:22 involve 9:21 involved 9:20 9:23 10:23 13:3 22:25 25:7,13,22 27:10,25 29:7 33:16 34:18 43:12,15,18 involvement 32:15 irony 46:11 item 43:10 items 42:9	job 42:7 johnson 2:8 4:6 8:15 9:10 13:15,20 15:24 17:19 18:12,20 41:8 51:20 52:7 53:3,7 joi 24:13,25 join 44:8 joined 46:16 jokingly 24:4 july 1:20 jump 8:11 june 13:13 18:16 40:10,11 40:13
i		k	kappa 1:7 4:13 10:3,7,12 11:4 11:10 keep 26:2 30:21 kind 5:23 6:10 6:18 12:10 17:2 33:13,18 34:8 37:11 42:24 45:10,12 45:24 47:7,8 49:3 knew 44:6 know 4:9 6:11 8:19 10:18 15:8 17:15 23:14 24:25 27:21 28:3,3,5 28:6,23 31:25
idea 32:19 41:24 54:11 ideas 40:14 42:7 ideation 32:18 identification 13:19,23 18:2 18:23 19:1 29:17 identified 14:17 19:5 identify 19:2 identity 15:17 23:4,6,7 31:17 32:8 36:15 illinois 2:5 imagine 5:11 10:17 27:4 immediate 24:12 impact 8:8 important 6:2 inches 39:14,14 include 35:8 includes 23:21 33:25 34:2 incorrect 15:6 incorrectly 35:1	j 24:15 jackets 19:9 jersey 1:19 2:10 57:4 jessica 2:4 4:8 4:11 7:1,11 25:14,23 26:4 26:8 29:11 53:2,14 54:18		

35:9,13,17 37:4 38:1 39:14 40:1 44:19 45:13 50:3,6 51:15 54:6 knowledge 13:2 17:3 knowledgeable 28:17 kyle 5:17,21,23 8:18 24:19	leave 15:23 left 10:2 11:5 18:22 31:3 33:15 legal 4:22 leisure 14:1 leon 16:24 letter 11:18 license 57:5 life 11:3,18 33:5 38:1 line 15:8 45:12 45:13 58:5 link 49:21 list 22:23 34:1 34:19 listed 17:4 32:20 44:2 listing 19:1 little 5:7 9:6 15:25 17:15 18:13 19:15 20:1 22:1 27:5 29:22 30:22 32:14 37:22 39:9 44:21 live 26:1 47:12 llc 58:1 llp 2:3 local 40:17 logistics 47:17 long 24:25 26:3 26:7 longer 15:17 32:8 48:16	look 9:4 31:24 54:19 looking 10:1 15:14 36:10 42:3 looks 26:13 39:11 lost 46:11 lot 24:2 38:2 39:21 40:2,24 lots 11:9 12:14 37:3 47:23 love 43:3	march 37:22,23 53:18 mark 6:13,13 6:14,15 9:24 10:18 12:23 13:8 18:9 19:3 marked 13:19 13:22 18:2 29:17 50:17 marketing 24:1 41:23,25 42:6 42:13 43:8 47:13 48:17 52:19 masked 38:21 40:22 masks 38:24 47:20 mason 22:21 master's 20:16 20:17 21:7 matter 1:5,16 6:11 10:24 13:4 24:21 25:7,13 27:23 29:7 49:5,11 matters 9:21 mcauliff 2:3 mcauliffe 4:12 mean 5:20 6:5 24:8 35:12 meaning 24:19 43:14 48:11 49:18
l		m	
l 11:24 lafayette 2:9 large 33:9 late 48:5 law 4:12 25:15 25:20 26:21 27:15 laws 26:2 lawyer 5:20 24:19 lead 33:12 leaders 34:11 leadership 12:13 15:19 21:1,15,17 22:7,16 23:4,5 23:19 24:14,17 31:17 leading 17:6 leads 22:12 league 16:22 33:19		m 16:21 made 41:3 48:3 56:7 maiden 4:23 mail 9:1 25:23 35:15 46:22 main 33:1 45:2 45:9 major 20:8 majored 20:13 make 5:8,10,24 5:24 6:23 34:19 44:4,9 44:22 45:15 53:3 54:19 making 54:4 manage 5:13 management 12:14 manipulate 9:6	

means 10:7 51:10 meant 38:9 media 17:10 34:5 41:13,20 42:4 46:25 48:10 medication 8:6 meet 12:11 45:1,8,9 meeting 25:4 26:9,10,13 member 27:11 41:23 48:15 members 12:3 23:3 38:3 48:24 memorable 45:15 mentioned 42:25 mile 44:10 miles 45:5 mind 37:21 50:11,13 53:3 mini 54:24 55:2 minimal 5:7 minute 27:4 50:11 minutes 29:3 minutia 48:14 mitigation 12:14 mobilize 38:2	mobilizing 37:12 modified 23:16 month 22:19 months 15:21 26:15 mouth 26:20 29:13 move 13:15 17:18 39:5 41:8 47:6 50:7 50:10 51:14 multicolored 39:15 multiple 26:15 37:10 43:5 multitude 43:15 music 45:14	needed 22:6 47:18 needs 32:1,5 neither 57:14 57:16 never 27:7,9 48:24 52:9 new 1:19 2:10 57:4 58:1 newbury 2:3 4:12 night 33:6,13 46:12 noles 38:10,14 40:15 41:4 43:13,16,23 46:17 48:5 51:8 normal 6:16 notary 1:18 56:17 57:3 58:25 noted 56:5 notes 1:15 5:5 notice 3:9 12:16 13:18 40:25 notified 24:24 nphe 38:2,6 54:3,3 number 15:5,8 15:11,13 17:20 24:5,8 34:1 38:1,16	numbers 33:9
			o
			o 11:24 24:15 oath 7:22 objection 5:24 objective 6:5 obtain 6:1 occasion 6:20 october 22:24 28:24 32:11 41:5,6 44:16 48:5,7 50:20 odd 19:15 offered 16:15 office 1:1 9:21 11:3,16,17 16:24 21:12 33:5,17,18,22 42:6 47:12 official 32:24 okay 6:7,10 7:11,13,19 8:24 9:1,2,17 10:1,10,15 12:1,9,15,25 13:14 14:3,9 15:10,14,23 16:7 17:11,14 18:6,10 19:22 20:3,7,15,22 21:3,22 22:18 22:23 23:15 24:18,23 25:6 25:15,17,20 26:18,22 27:20

27:22 28:7,16 29:2,9,23 30:2 30:4,6,16,18 31:3,6,9,19 32:10,24 33:25 34:10 35:6,10 35:19,23 36:1 36:5,7,18 37:16 41:2,7 41:15 42:2,10 43:12 45:4,7 45:17 46:2,24 47:5,24 48:8 48:18 49:11 50:7,14 51:13 51:23 52:11,17 53:9 54:15,17 once 21:23 41:16 44:6 open 26:3 34:4 48:23,25 49:9 opposed 12:3 29:20 32:6 48:5 opposer 10:4,8 14:17 opposition 1:3 order 54:23 organization 11:14 12:3,4,8 25:18 27:11 organizations 11:19 12:12 34:14,17 53:19 53:23	outdoors 40:21 outreach 42:1 outside 28:20 38:23,24 45:11 overseeing 23:2 own 9:5,7 13:25	33:18 35:17 40:5 45:17 particular 10:16,23 13:4 25:13 28:13 31:7 32:16 37:24 39:12 41:19,21 47:25 50:1 parties 57:16 partner 46:12 partners 32:20 parts 35:7 passage 32:1 past 31:22 53:25 patent 1:1 9:21 patricia 1:17 57:3,23 pattishall 2:3 4:12 patty 4:16 6:18 6:20 7:2 13:16 17:24 54:20,22 people 6:13 28:23 34:2,3,5 34:6,15 37:6 37:12,13 38:16 38:20 40:1,2,5 40:20 42:3 45:13 46:14 48:9,15 49:4 49:15 52:3,12 52:19	period 46:23 person 5:13 28:12,17,25 36:24 42:2,3,5 42:18 47:20 personal 23:7 peruse 13:25 51:24 phillips 24:13 24:25 27:16,23 philosophy 20:9 22:3 philpot 1:9 3:3 3:12 4:1,4,15 4:22,22 5:4 8:17 9:11 13:24 16:1 18:3,18,22 29:17,18 30:25 32:4 49:24 50:18 51:15 53:9,17 54:16 56:10 57:7 58:3,21 phone 15:5,13 26:11 photo 47:18 phrase 16:20 36:22 38:10 53:20,24 phrases 37:3 physically 46:22 picked 38:7 39:3
---	--	---	--

picks 44:19,19 piece 45:22 pieces 45:21 pirg 16:22 33:19 place 45:10 57:13 places 26:25 plan 44:25 51:7 planned 40:24 planning 32:18 33:12 34:21 plantation 4:24 plate 25:2 platform 37:24 play 38:12 plaza 45:1 please 54:23 pleasure 24:11 point 9:17 17:7 23:5 43:23 45:5 47:19 policy 20:19 21:1 40:19 political 36:23 poll 4:7 6:14 poll's 18:9 polling 33:23 45:11 polls 1:5,10 2:10 10:14,18 10:19 12:17,21 13:3,8 14:18 16:21 17:6 18:8 28:21	34:9 36:21,23 37:7,9,12,14 38:3,11,13,14 38:16,18,25 39:1,2 40:15 43:24 44:1,7 44:14 45:19 46:17,23 49:25 50:21 51:8 53:20,25 54:4 portfolio 23:24 position 11:6 31:11 possible 5:10 6:24 8:4 49:5 possibly 48:4,5 post 17:10 posters 45:23 posting 41:14 48:10 posts 3:13 42:8 50:16 51:17 precinct 33:24 45:3,11 presence 34:19 president 21:12 24:11 previously 43:1 primarily 23:11 48:21 primary 40:16 principal 22:25 print 43:3,9 printout 18:7	prior 10:23 13:3 37:11 57:6 privilege 5:22 probably 17:2 17:9 28:22 44:8 48:13,15 proceeding 10:8 14:11 proceedings 1:16 10:24 50:15 process 5:9 7:25 25:8,10 27:14 42:17 program 39:23 programers 42:8 programing 23:5 39:21 programs 23:19,20 47:14 project 16:23 33:21 promo 42:9 promote 17:8 39:21 49:3 promoted 23:9 34:4 promoting 23:21 33:12 37:6 40:8 promotion 40:5 41:25 46:24 54:5	promotional 47:1 property 12:24 protect 43:25 provide 4:19 28:12 provided 26:21 45:18 providing 28:9 public 1:18 23:12 26:1 48:1 49:10 56:17 57:3 58:25 published 48:1 pull 29:15 pulled 33:7 pulling 9:8 purposes 50:23 pushing 52:19 put 26:19,24,25 29:13 30:22 36:13 41:16 51:17 putting 8:25 38:20 49:9
q			
question 7:3,4 32:10 43:20 46:7 50:19 51:25 questioning 16:14 questions 6:4,6 7:15,16 8:9			

16:13 17:15 26:9 53:4,8,10 53:12 54:14 quick 15:6	records 15:11 recreation 34:7 34:8 recross 3:2 redirect 3:2 refer 5:17 24:4 reference 9:18 10:3 12:18,21 13:7,9 15:10 16:4 referenced 14:17,18 referring 14:14 refers 9:18 10:2 regarding 24:20 registration 9:24 18:9 23:10 37:2 regular 54:24 55:1,3 relating 24:21 relative 57:15 57:17 relatively 15:16 relevant 38:5 remember 35:14,17 37:17 43:4,14 45:6 remembering 40:1 reminder 40:1 remote 1:5 remotely 1:19	removal 36:14 repeat 22:13 repertoire 22:2 reporter 1:18 54:24 57:4 reporting 24:3 24:6 58:1 represent 4:13 14:9 18:6,25 51:21 representing 4:6 51:16 required 47:19 49:18 reside 4:24 respect 7:7 8:4 12:21 29:19 32:11 36:20 49:24 50:1 respond 8:9 responded 7:4 25:24 26:4 response 40:23 responsible 23:22 34:20 41:20 43:8 returned 26:14 27:1 review 8:8 32:6 right 6:2 13:7 14:22 17:17 18:21 19:5 20:11 22:8,10 26:1,5,23 28:5 31:1,10 32:18	33:22 37:7,23 40:15 41:10 46:11 47:12 49:4 51:1,3 53:21 54:6 risk 12:14 road 4:24 role 21:19 22:24 23:1,2 23:17 25:6 32:15 roll 18:20 34:9 room 6:8 routes 47:17 row 15:1 16:5 19:12 rural 11:25
r			s
r 2:1 reached 26:16 read 5:6 16:8 16:18 18:25 19:4,16 26:21 31:4 56:3 reading 30:10 real 15:6 realize 30:9 really 5:8,17 27:7 51:25 54:2 reason 39:20 51:2 58:5 recall 27:19 35:7,14 40:7 received 9:12 35:2 receiving 35:14 recently 9:12 15:17 recognize 39:6 recollection 42:11 52:11 record 4:10 6:19,19,24 16:9,17 17:24 17:25 19:24 22:10 36:9 54:20,21 56:6			s 2:1 3:7 11:24 58:5 salient 38:5 saying 34:15 says 13:8 18:23 19:8,12 schedule 26:16 schedules 25:2 scholarships 23:24,25 school 11:24 20:10 28:12 screen 8:16,25 9:2,5 13:25 scroll 15:25 18:13 52:8

scrolling 30:22 second 14:21 15:14 19:11,21 30:4,24 41:9 41:12,13 secure 10:14 see 8:24 9:1,2 10:1,3,18 12:17,17 13:9 13:12 14:16,23 15:15 16:1 18:11,17,22 19:7,13 30:5 32:7 44:7 51:6 51:9 seems 35:24 seen 9:14 14:5 14:8 18:3 29:24 30:7,12 30:15,17,20 52:9 54:7 sees 49:12 selves 40:4 seminoles 38:11 sense 6:11 27:22 28:1 41:3 47:24 sent 8:18 separate 9:5 42:5 september 48:7 sequence 43:21 ser 1:3	serve 24:11 39:25 service 9:24 21:18 24:17 services 24:14 34:8 set 44:18 57:13 setup 32:22 seven 36:3,19 45:5 shake 6:17 share 8:15 25:24 shared 25:4 sheet 56:5 58:1 shifted 22:1 shirts 19:10 shop 24:1 shorthand 1:18 11:11 show 18:15 23:14 38:17 showed 34:2,3 34:5,8,14,22,23 shown 28:9 side 18:23 46:7 sign 27:17 36:11,17 38:17 48:11 signature 30:25 57:22 signed 18:19 25:9 26:14,23 27:1 31:7 32:2 48:9	signing 26:12 similar 52:14 single 36:24 40:16 situation 5:21 six 36:2 sixth 30:16 sketch 42:18,22 skip 36:1 skipping 5:16 skirts 19:10 slogan 36:23 slogans 37:20 small 11:24 smattering 22:5 smith 1:17 57:3 57:23 social 11:18 17:10 21:16 22:7 34:5 41:13,20 42:4 46:25 48:10 socks 19:10 solicitation 45:12 somebody 9:23 25:17 44:19 somewhat 5:9 16:13 51:22 sorority 1:7 4:14 10:3,13 11:3,8,9,17 33:5 38:1	sorry 17:23 25:11 30:8,13 33:14 36:5 49:6 53:14 sort 5:12 sound 26:20 sounded 35:1 sounds 9:12 37:18 39:10 49:25 south 2:4 20:13 20:20 21:8 southern 11:25 21:9 space 52:13 speaking 5:14 specific 17:2,14 28:23 39:8,23 43:16 54:1 specifically 8:20 29:19 44:16 spell 11:23 spelling 24:15 spoken 24:20 sponsor 33:1 spreader 33:8 46:13,15 square 41:13 staff 23:3 41:23 43:8 48:15,17 48:23 stanback 2:7,8 3:4 4:3,5,8,16 8:13 9:8 13:15
---	--	---	---

13:20 15:24 17:17,23 18:12 18:20 30:21 36:8 50:9,13 51:19 52:7 53:2,9,14 54:15,18 55:2 standing 12:12 standpoint 8:3 start 20:4 22:23 started 20:1 21:14,14 31:16 40:8 starts 30:18 state 1:18 5:1 11:4,16,20,22 16:21 20:6,7 20:21,22 21:9 21:11 22:16 26:2 33:5 38:11 57:4 statement 26:12,21 statements 56:7 states 1:1 stayed 21:24 stenographic 1:15 stenographic... 57:12 step 19:20 25:11	stepping 38:4 54:4 sticker 39:13 39:15,18 45:22 stickers 17:9 39:20,21 41:10 41:11 46:25 48:10,20 51:5 51:9 stop 6:20 18:14 52:22 street 2:9 stretch 36:5 stroll 1:5,10 2:10 4:7 6:14 10:13,17,19 12:17,21 13:2 13:8 14:18 16:20 17:5 18:7,9 28:21 36:20,22 37:9 38:13 39:2 43:25 44:6,14 45:18 49:24 50:21 53:20,24 strolling 33:23 38:3,4 54:4 strolls 41:4 43:13,19 48:4 structure 12:11 24:7 sttp 3:9,10,11 3:12,13 13:18 13:22 18:1 29:7,16 50:16	58:2 student 11:16 12:12 21:12 23:12 34:11,11 49:22 students 12:8 12:14 16:23 23:3,25 34:6 39:19,22 46:16 46:21 48:22 49:2,17,22 51:5,5 studies 20:12 20:19 21:2 stuff 12:13 23:7 34:8 41:16 subject 28:8,13 subjects 16:10 16:18 28:11 subscribe 56:6 subscribed 56:12 58:22 substance 7:13 success 46:3,8 46:9,17 successful 46:19 sudden 44:7 suggesting 26:20 suit 19:9 suite 2:5,9 summary 16:10 16:16 28:11	summer 22:20 22:21 sunshine 26:2 super 33:8 46:13,15 47:13 supervisor 16:24 24:12,24 33:21 44:18 sure 4:11,21 5:8 6:23 16:20 17:4,16 26:13 28:22 32:17 35:22 36:4,22 39:13 44:22 46:9 53:3 54:9 survivor 24:5 swap 37:4 swimwear 19:10 swipe 49:19 sworn 4:2 56:12 57:7 58:22 sylvester 1:9 3:3 4:1,21 56:10 57:7 58:3,21
			t
			t 3:7 11:24 table 43:24 44:4 take 6:25 7:1,3 32:2 38:18 42:7 46:18

taken 1:17 57:12 talked 44:21 48:3 talking 11:12 27:13 34:14 talks 31:11 tallahassee 4:25 taught 22:6,7 teach 22:5 teaching 22:2,3 team 23:4 47:13 teeing 47:5 teleconference 1:19 tell 7:23 11:1 12:4 17:1 22:11 34:25 39:9 47:7 ten 38:24 39:1 term 28:21 terminology 6:12 32:12 50:21,25 52:15 terms 5:9 6:19 7:25 9:22 25:21 27:14 42:17 49:8 50:4 52:20 testified 4:2 53:17 testify 16:15 57:8	testimony 7:17 16:10 28:9,11 57:11 text 48:12 thank 5:2 7:12 10:20 12:1,15 13:14 14:22 16:11,25 19:11 19:18,19 20:15 24:18 26:18 27:4 29:2,15 31:19 34:24 36:5,18 47:6 50:14 51:10 54:13 55:2 thanks 7:20 thing 32:7 37:21 38:9 44:14 49:3,10 49:12 things 4:17 5:16 6:18 8:20 22:11,25 23:9 23:11,13 25:1 25:2 26:3 31:20 38:5 40:18,24 43:21 47:18 49:17 think 5:19 6:25 17:11 24:25 25:24 26:4,10 26:24 27:5 28:10 32:1 37:21 39:5 40:3,10 44:21	46:2,6,8,9 50:18 53:11 54:20 thinking 7:25 thinks 7:1 third 16:1 thought 7:25 30:10 44:7 thoughts 7:11 three 17:20 22:19 34:2 35:23 time 5:14 11:5 14:3,8 21:6,13 23:3 26:3,8 29:3 30:3 32:2 32:3 39:17,25 40:3,16 41:19 44:12,13 45:14 48:16 50:4,22 51:11 52:2,12 57:12 timeframe 22:24 33:10 51:18 timeline 31:10 times 37:10 title 15:15,18 22:15 23:16 32:7 41:24 today 14:7 25:4 36:17 today's 36:13 together 37:14 47:20	tomorrow 33:14 tons 34:22,23 took 43:23 top 9:18 10:2 14:16,22 15:8 31:11 topics 16:16 totality 46:15 totally 42:4 trademark 1:1 1:2 3:11 9:19 9:21,22,24 10:14,15 14:12 18:1 trademarked 12:23 training 23:6 transcript 1:15 54:23 56:3,6 57:11 trenton 2:10 trial 1:2 9:19 9:22 14:12 tried 39:23 true 32:9 35:12 36:16 57:11 trust 40:4 truth 7:24,24 7:24 57:8,8,9 try 6:6 22:13 38:9 52:17 trying 5:21 6:1 6:10 7:6 11:20 19:2 31:10
---	--	---	--

43:17 52:3 54:18 ttab 14:13,14 turn 37:2 42:8 48:24 49:20 turned 35:3 39:18 turnout 23:11 37:15 38:12 two 4:6 24:5,8 31:22 35:21 39:14 45:21 type 5:22 6:1 7:25 23:7,11 typically 40:14	united 1:1 university 5:1 11:4,15,16,21 11:22 12:7,11 16:21,22 20:6 20:12 22:16,21 22:22 23:13 24:11 25:6 27:24 28:20 40:19 47:21 unmasked 38:21 updated 15:16 15:20 32:1,5 uploading 8:14 upper 13:7 use 4:23 16:20 17:3,5 19:12 28:20 37:3,17 39:21,23 47:12 50:25 51:2,3,7 53:24 used 14:13 17:5 17:7 38:10 41:18 45:24 50:21 51:7 53:20,24 using 6:12 16:13 52:14 usually 26:1 42:21 46:13,18 49:16 51:5 utilized 17:5	v v 11:24 58:2 vaccinated 38:21,22 valdosta 11:4 11:15,22 21:9 values 23:7 vein 23:19 ventures 21:4 verbally 6:21 verbiage 6:19 veritext 58:1 version 13:24 vice 21:12 view 52:5 virtual 5:15 26:11 voice 37:8 vote 23:8 40:1 40:2 44:15 46:22 47:18 49:4 voter 23:10,10 23:10 37:2,2 37:14 38:12 52:14 voters 16:22 33:19 38:2 45:15 votes 33:17 42:24 44:1 voting 23:21 37:2,6 44:17 44:20 45:3 48:17 54:5	vs 1:9 w w 2:9 wacker 2:4 walk 38:24 45:3,9,16 walking 37:13 38:25 47:17 want 4:9 5:25 7:23 9:14,17 16:4 26:19 27:6 29:13 35:19 44:22 51:4 52:7,17 54:15 wanted 18:15 19:23 wanting 42:24 wants 44:8 water 45:13 way 25:7 37:11 37:22 40:4 41:22 47:9 we've 7:3 wear 47:20 web 45:22 47:12 52:21 website 17:8 25:25,25 34:5 47:2,3,7,10,15 47:23,25 48:6 48:8,11,13,20 week 22:8 weekly 25:1
u			
uh 6:17 12:19 14:20 15:2 19:14 51:12 under 7:22 37:5 undergraduate 12:8 23:12 understand 5:25 6:3 7:5,8 23:15 28:7 35:19 43:17 44:22 46:20 understanding 7:21 10:6,10 10:12 12:20 34:1 understood 54:12			

welcome 7:19	workshops
went 20:4,6,7	23:6
43:25	world 4:23
west 45:9	worn 45:18
westcott 45:1	wrote 35:13
widely 34:4	x
wild 39:20	x 3:7
willard 2:8 4:5	y
williard 2:7	yeah 22:1
willing 36:11	32:13 34:21
witness 3:2	37:20,20 42:13
16:15 25:8	47:4 48:6
53:11 54:17	52:22 54:11,11
witnesses' 58:3	year 51:8
women 16:22	years 20:18
33:19	21:10 26:15
word 26:24	28:4 31:12,14
35:2	31:22 37:10
wording 49:11	38:1,16 51:6
words 26:19	york 58:1
29:13	yup 5:3 10:21
work 4:25	18:19 20:23
14:12 21:3,12	31:21
21:14 22:1,7	z
23:18,20,23	zoom 1:19
24:1 29:1 37:1	26:10
37:11 41:21	
worked 11:2,15	
11:18 12:7	
21:7,8 37:25	
48:16	
working 11:14	
21:13,15 52:13	
works 9:3	
48:16	

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Alpha Kappa Alpha Sorority	Opposer,	Opposition No. 91267937
v.		Mark: STROLL TO THE POLLS
Stroll to the Polls, Inc.	Applicant.	Serial No. 90012428
		Filed: June 20, 2020
		Published: Nov. 03, 2020

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that, pursuant to 37 CFR § 2.123(c), TMBP 703.01, and the Federal Rules of Civil Procedure, Applicant Stroll to the Polls, Inc. will take the deposition upon oral cross-examination of **ERIN SYLVESTER PHILPOT**, commencing at 3:00pm on Friday, July 26, 2024, at 36 W Lafayette St., Suite 103, Trenton, NJ 08608, via Virtual Zoom or other videoconference technology before a notary public or other officer authorized to administer oaths.

The deposition will be recorded by stenographic and audiovisual means.

Dated: July 24, 2024



Willard A. Stanback

WILLARD ALONZO STANBACK, PC

36 West Lafayette Street, Suite 103

Trenton, New Jersey 08608

Telephone: 855-614-1111

Facsimile: 609-751-5121

willardalonzo@stanback-pc.com

Attorneys for Applicant Stroll to the Polls, Inc.

STTP 001

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of **STROLL TO THE POLLS** Ser. No. 90/012,428

Alpha Kappa Alpha Sorority

Opposer,

v.

Stroll to the Polls, Inc.

Applicant.

Opposition No. 91,267,937

**OPPOSER ALPHA KAPPA ALPHA SORORITY'S FIRST AMENDED PRETRIAL
DISCLOSURES**

Pursuant to Rule 2.121(e) of the Trademark Rules of Practice, Opposer, Alpha Kappa Alpha Sorority ("AKA"), provides the following pretrial disclosures to Applicant, Stroll to the Polls, Inc. ("STTP"):

I. Witnesses

AKA discloses the following information regarding the witnesses from whom it intends to take testimony:

Name and Contact Information	Position	General Summary of Testimony Subjects
Dr. Nicole Barrett 5656 South Stony Island Ave. Chicago, IL 60637 (773) 684-1282 *Dr. Barrett should only be contacted through AKA's counsel.	Deputy Director of AKA	AKA's use of the phrase "stroll to the polls"; third- party uses of the phrase "stroll to the polls"

STTP 102

<p>Dr. Erin Sylvester Philpot</p> <p>Florida State University The Center for Leadership and Service 100 South Woodward Avenue Tallahassee, FL 32306 850-644-3342 esylvester@fsu.edu</p>	<p>Assistant Director for Leadership & Identity at Florida State University</p>	<p>Use of the phrase “stroll to the polls” by Florida State University, Florida A&M University, the League of Women Voters, Florida PIRG Students, Campus Election Engagement Project, and the Leon County Supervisor of Elections Office</p>
<p>Priestley Johnson</p> <p>Civic Nation P.O. Box 34673 1400 L Street NW Washington, D.C. 20005 202-908-5226 priestley@civcnation.org</p>	<p>Director of Strategic Community Partnerships at When We All Vote, a project of Civic Nation</p>	<p>Use of the phrase “stroll to the polls” by When We All Vote/Civic Nation, Zeta Phi Beta sorority, and Phi Beta Sigma fraternity</p>
<p>Dorcas E. Washington</p> <p>Delta Sigma Theta Sorority, Incorporated 1707 New Hampshire Ave. NW Washington, D.C. 20009 202-986-2400 DWashington@deltasigmatheta.org</p>	<p>Executive Director of Delta Sigma Theta Sorority, Incorporated</p>	<p>Use of the phrase “stroll to the polls” by Delta Sigma Theta Sorority, Incorporated</p>

II. Evidence

During its testimony period, AKA intends to introduce documents and evidence regarding AKA’s use of the phrase “stroll to the polls”; third-party uses of the phrase “stroll to the polls”; and STTP’s efforts to register “stroll to the polls” as a trademark.

Dated: February 27, 2024

Respectfully submitted,

PATTISHALL, McAULIFFE, NEWBURY,
HILLIARD & GERALDSON LLP

By: /Jessica A. Ekhoﬀ/

Jessica A. Ekhoﬀ
Felicia G. Traub
200 South Wacker Drive, Suite 2900
Chicago, Illinois 60606
(312) 554-8000
jae@pattishall.com
fgt@pattishall.com

*Attorneys for Opposer,
Alpha Kappa Alpha Sorority*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing OPPOSER ALPHA KAPPA ALPHA SORORITY'S FIRST AMENDED PRETRIAL DISCLOSURES was served upon the counsel for Stroll to the Polls, Inc. identified below by email on February 27, 2024:

Willard A. Stanback
Willard Alonzo Stanback PC
36 West Lafayette Street, Suite 103
Trenton, NJ 08608
willardalonzo@stanback-pc.com

/Jessica A. Ekhoﬀ/

Under the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless it displays a valid OMB control number.

USPTO Form 1012 (Rev. 08/2005)

USPTO Form 1012 (Rev. 08/2005)

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 90012428

Filing Date: 06/20/2020

NOTE: Data fields with the * are mandatory under TEAS Plus. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.

The table below presents the data as entered.

Input Field	Entered
TEAS Plus	YES
MARK INFORMATION	
*MARK	STROLL TO THE POLLS
*STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
LITERAL ELEMENT	STROLL TO THE POLLS
*MARK STATEMENT	The mark consists of standard characters, without claim to any particular font style, size, or color.
REGISTER	Principal
APPLICANT INFORMATION	
*OWNER OF MARK	Ramona Prioleau
*MAILING ADDRESS	2266 Fifth Ave., #728
*CITY	New York
*STATE (Required for U.S. applicants)	New York
*COUNTRY/REGION/JURISDICTION/U.S. TERRITORY	United States
*ZIP/POSTAL CODE (Required for U.S. and certain international addresses)	10037
*EMAIL ADDRESS	XXXX
WEBSITE ADDRESS	https://strolltothepolls.org
LEGAL ENTITY INFORMATION	
*TYPE	INDIVIDUAL
*COUNTRY/REGION/JURISDICTION/U.S. TERRITORY OF CITIZENSHIP	United States
GOODS AND/OR SERVICES AND BASIS INFORMATION	
*INTERNATIONAL CLASS	025
*IDENTIFICATION	Aprons; Bibs, not of paper; Bodysuits; Dresses; Footwear; Hats; Jackets and socks; Pants; Shirts; Skirts; Swimwear

STTP 003

* FILING BASIS	SECTION 1(a)
FIRST USE ANYWHERE DATE	At least as early as 00/00/2018
FIRST USE IN COMMERCE DATE	At least as early as 00/00/2018
SPECIMEN FILE NAME(S)	
ORIGINAL PDF FILE	SPE0-1-6812923780-2020062 0230741446166 . Stroll to the Polls TM Attachement - Class 25.pdf
CONVERTED PDF FILE(S) (7 pages)	\\TICRS\EXPORT18\IMAGEOUT 18\900\124\90012428\xml1\ FTK0003.JPG
	\\TICRS\EXPORT18\IMAGEOUT 18\900\124\90012428\xml1\ FTK0004.JPG
	\\TICRS\EXPORT18\IMAGEOUT 18\900\124\90012428\xml1\ FTK0005.JPG
	\\TICRS\EXPORT18\IMAGEOUT 18\900\124\90012428\xml1\ FTK0006.JPG
	\\TICRS\EXPORT18\IMAGEOUT 18\900\124\90012428\xml1\ FTK0007.JPG
	\\TICRS\EXPORT18\IMAGEOUT 18\900\124\90012428\xml1\ FTK0008.JPG
	\\TICRS\EXPORT18\IMAGEOUT 18\900\124\90012428\xml1\ FTK0009.JPG
SPECIMEN DESCRIPTION	Screenshots and Photo
ADDITIONAL STATEMENTS INFORMATION	
*TRANSLATION (if applicable)	
*TRANSLITERATION (if applicable)	
*CLAIMED PRIOR REGISTRATION (if applicable)	
*CONSENT (NAME/LIKENESS) (if applicable)	
*CONCURRENT USE CLAIM (if applicable)	
CORRESPONDENCE INFORMATION	
NAME	Ramona Priolcau
PRIMARY EMAIL ADDRESS FOR CORRESPONDENCE	gotv@strolltothepolls.org
SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES)	NOT PROVIDED
FEE INFORMATION	
APPLICATION FILING OPTION	TEAS Plus
NUMBER OF CLASSES	1
APPLICATION FOR REGISTRATION PER CLASS	225
*TOTAL FEES DUE	225
*TOTAL FEES PAID	225
SIGNATURE INFORMATION	

* SIGNATURE	/Ramona Prioleau/
* SIGNATORY'S NAME	Ramona Prioleau
* SIGNATORY'S POSITION	Founder
* DATE SIGNED	06/20/2020

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 90012428

Filing Date: 06/20/2020

To the Commissioner for Trademarks:

MARK: STROLL TO THE POLLS (Standard Characters, see [mark](#))

The literal element of the mark consists of STROLL TO THE POLLS. The mark consists of standard characters, without claim to any particular font style, size, or color.

The applicant, Ramona Prioleau, a citizen of United States, having an address of

2266 Fifth Ave., #728

New York, New York 10037

United States

XXXX

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

For specific filing basis information for each item, you must view the display within the Input Table.

International Class 025: Aprons; Bibs, not of paper; Bodysuits; Dresses; Footwear; Hats; Jackets and socks; Pants; Shirts; Skirts; Swimwear

Use in Commerce: The applicant is using the mark in commerce on or in connection with the identified goods/services. The applicant attaches, or will later submit, one specimen as a JPG/PDF image file showing the mark as used in commerce on or in connection with any item in the class of listed goods/services, regardless of whether the mark itself is in the standard character format or is a stylized or design mark. The specimen image file may be in color, and the image must be in color if color is being claimed as a feature of the mark.

In International Class 025, the mark was first used by the applicant or the applicant's related company or licensee predecessor in interest at least as early as 00/00/2018, and first used in commerce at least as early as 00/00/2018, and is now in use in such commerce. The applicant is submitting one(or more) specimen(s) showing the mark as used in commerce on or in connection with any item in the class of listed goods/services, consisting of a(n) Screenshots and Photo.

Original PDF file:

[SPE0-1-6812923780-2020062 0230741446166 . Stroll to the Polls TM Attachement - Class 25.pdf](#)

Converted PDF file(s) (7 pages)

[Specimen File1](#)

[Specimen File2](#)

[Specimen File3](#)

[Specimen File4](#)

[Specimen File5](#)

[Specimen File6](#)

[Specimen File7](#)

For informational purposes only, applicant's website address is: <https://strolltothepolls.org>

The applicant's current Correspondence Information:

Ramona Prioleau

PRIMARY EMAIL FOR CORRESPONDENCE: gotv@strolltothepolls.org

SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES): NOT PROVIDED

Requirement for Email and Electronic Filing: I understand that a valid email address must be maintained by the applicant owner/holder and the applicant owner's/holder's attorney, if appointed, and that all official trademark correspondence must be submitted via the Trademark

Electronic Application System (TEAS).

A fee payment in the amount of \$225 has been submitted with the application, representing payment for 1 class(es).

Declaration

☐ **Basis:**

If the applicant is filing the application based on use in commerce under 15 U.S.C. § 1051(a):

- ☒ The signatory believes that the applicant is the owner of the trademark/service mark sought to be registered;
- ☒ The mark is in use in commerce and was in use in commerce as of the filing date of the application on or in connection with the goods/services in the application;
- ☒ The specimen(s) shows the mark as used on or in connection with the goods/services in the application and was used on or in connection with the goods/services in the application as of the application filing date; and
- ☒ To the best of the signatory's knowledge and belief, the facts recited in the application are accurate.

And/Or

If the applicant is filing the application based on an intent to use the mark in commerce under 15 U.S.C. § 1051(b), § 1126(d), and/or § 1126(e):

- ☒ The signatory believes that the applicant is entitled to use the mark in commerce;
 - ☒ The applicant has a bona fide intention to use the mark in commerce and had a bona fide intention to use the mark in commerce as of the application filing date on or in connection with the goods/services in the application; and
 - ☒ To the best of the signatory's knowledge and belief, the facts recited in the application are accurate.
- ☐ To the best of the signatory's knowledge and belief, no other persons, except, if applicable, concurrent users, have the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other persons, to cause confusion or mistake, or to deceive.
- ☐ To the best of the signatory's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, the allegations and other factual contentions made above have evidentiary support.
- ☐ The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that all statements made of his/her own knowledge are true and all statements made on information and belief are believed to be true.

Declaration Signature

Signature: /Ramona Prioleau/ Date: 06/20/2020

Signatory's Name: Ramona Prioleau

Signatory's Position: Founder

Payment Sale Number: 90012428

Payment Accounting Date: 06/22/2020

Serial Number: 90012428

Internet Transmission Date: Sat Jun 20 23:38:02 ET 2020

TEAS Stamp: USPTO/FTK-XX.XXX.XXX.XX-2020062023380271

2868-90012428-71056d48dd79c18b7b9821822c

85ef51a69ca7c2ea3ae6acfb56b81be64276ac-C

C-38009577-20200620230741446166

STROLL TO THE POLLS



SHOP



Unisex Jersey Short Sleeve Tee
\$25.00

Color

White

Size

L



Unisex Jersey Long Sleeve Tee
\$30.00

Color

Black

Size

L



Infant Fine Jersey Bodysuit
\$17.93

Color

White

Size

12M





Embroidered Baby Bib (Pink)

\$16.99

Add to cart



Embroidered Baby Bib (Blue)

\$16.99

Add to cart



Embroidered Baby Bib (Gray)

\$16.99

Add to cart





Flip-Flops
\$19.99

Add to cart



Women's Sneakers
\$80.00

Size
US 6
Color
Black

Add to cart



Men's Sneakers
\$80.00

Color
Black
Size
US 9

Add to cart





Women's Varsity Jacket

\$80.00

Color

Black/White

Size

L

Add to cart



Men's Varsity Jacket

\$80.00

Size

L

Color

Black/Vintage Heather

Add to cart



Women's Leggings

\$40.00

Color

White Seams

Size

M

Add to cart





Women's Skater Skirt

\$40.00

Size

M

Weight

4 oz.

Add to cart



Women's Racerback Dress

\$40.00

Size

M

Add to cart



Women's One-piece Swimsuit

\$30.00

Color

Black

Size

M

Add to cart





Unisex Twill Hat
\$25.00

Add to cart



Embroidered Apron
\$30.00

Black

Out of stock



Socks
\$18.00

Add to cart

ESTTA Tracking number: **ESTTA1352439**Filing date: **04/15/2024**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding no.	91267937
Party	Plaintiff Alpha Kappa Alpha Sorority
Correspondence address	JESSICA A EKHOF PATTISHALL MCAULIFF NEWBURY HILLIARD & GERALDSON LLP 200 SOUTH WACKER DRIVE SUITE 2900 CHICAGO, IL 60606 UNITED STATES Primary email: jae@pattishall.com Secondary email(s): fgt@pattishall.com, pam@pattishall.com 312-554-8000
Submission	Testimony For Plaintiff
Filer's name	Jessica A. Ekhoft
Filer's email	jae@pattishall.com, jgv@pattishall.com
Signature	/Jessica A. Ekhoft/
Date	04/15/2024
Attachments	Declaration of Erin Sylvester Philpot.pdf(4289886 bytes)

STTP004

DECLARATION OF DR. ERIN SYLVESTER PHILPOT

1. I am the Assistant Director for Leadership & Identity at Florida State University ("FSU"). I have held my position for four years. The contents of this declaration are within my personal knowledge.

2. In the course of conducting its regular business activities, FSU maintains records of past programs and events. These records are made at or near the time the programs and events were conducted. It is a regular practice of FSU's business activities to make and keep these records. As the Assistant Director for Leadership & Identity at FSU, I am familiar with these records.

3. On October 24, 2020, FSU, in collaboration with Florida A&M University, the League of Women Voters, Florida PIRG Students, Campus Election Engagement Project, and the Leon County Supervisor of Elections Office, held an event called "Stroll to the Polls." During the event, participants met at a central location and then walked together to one of three early voting sites to vote in the 2020 Presidential election.

4. Attached hereto as Exhibit 1 is a true and correct copy of a sticker that was disseminated to participants of the Stroll to the Polls event.

5. Attached hereto as Exhibit 2 is a true and correct copy of the social media square graphic artwork used to promote the Stroll to the Polls event on Instagram.

6. Attached hereto as Exhibit 3 is a true and correct copy of the event specific website that promoted the Stroll to the Polls event and served as a common information site and route map for the day of the program.

7. I believe the phrase "stroll to the polls" is a commonplace political slogan and not an indicator that goods or services come from a single person or entity.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 27 day of May, 2022 in Tallahassee, Florida.

A handwritten signature in black ink, appearing to read "E. Philpot", written over a horizontal line.

EXHIBIT 1

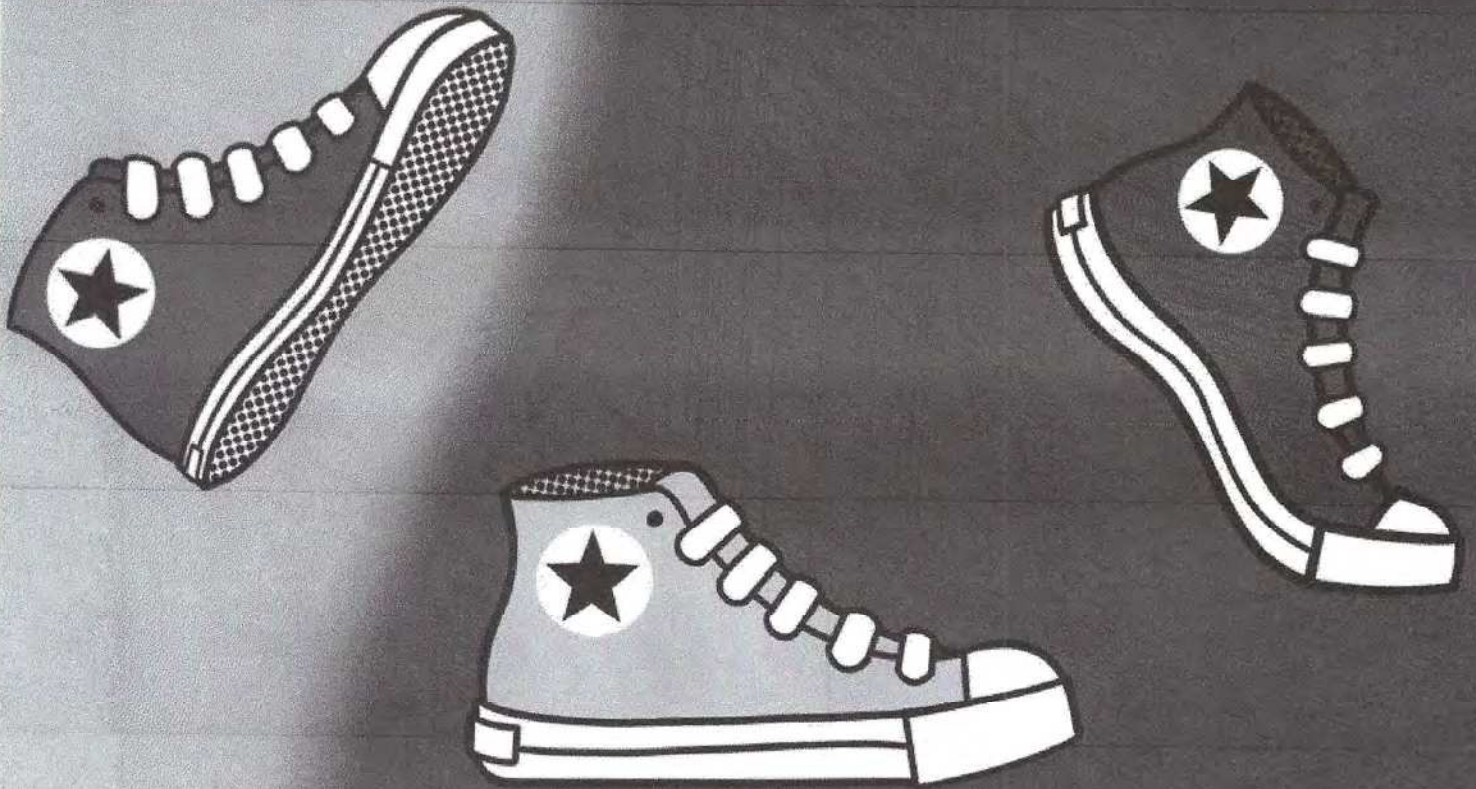
STROLL TO THE POLLS



OCTOBER 24, 2020

EXHIBIT 2

STROLL TO THE POLLS



OCTOBER 24, 2020

EXHIBIT 3

FSU VOTES

Stroll to the Polls

STROLL TO THE POLLS



OCTOBER 24, 2020

Event Description

Join students, faculty, staff and community members as we Stroll to the Polls on Saturday, Oct. 24 as part of **Vote Early Day 2020** (<https://www.voteearlyday.org/about-us/>). The TLH Votes coalition will host a community walk and bike to the polls event. Participants will meet in Westcott Plaza and then walk in groups of 50 people or

less to one of three local Early Voting sites between 10 a.m. and 3 p.m. Campus Recreation will also check out bikes at Westcott and group rides to polling locations. Those with their own bikes are welcome to join these groups as well. Shuttles with reduced capacity will offer return trips to those who need to return to campus.

We hope that you will join us in heading to the polls to cast your ballot or drop off your vote-by-mail ballot in person.

Participate

This event is open to anyone who would like to vote early or support in other ways. Volunteer options are available both in person and virtually.

Face-to-face volunteer options include helping at the check-in or hydration stations or serving as a route guide. Virtual options include participating in our Oct. 21 Couch Party to encourage your friends and family to vote or join FloridaPIRGs for a phone-a-thon on Vote Early Day. For those who want to encourage participants while remaining socially distant, morale captains are invited to join throughout the routes. Learn more about the roles at the registration links below.

STROLL / BIKE

VOLUNTEER

What to bring

- Photo ID ([/frequently-asked-questions#ID](#))

- Mask
- Water bottle
- Comfortable shoes
- Weather-appropriate clothing
- Snack (in case the lines are long at voting sites)
- A completed sample ballot (<https://www.leonvotes.gov/Sample-Ballots/-View-My-Sample-Ballot>) (to help your voting go more smoothly)

Please note: Masks must be worn at all times, even though this is an outdoor event.

Please be mindful of others and maintain a comfortable physical distance for safety.

All social distancing measures required at Early Voting sites should be followed.

Have more voting questions? **Check our F.A.Qs! (/frequently-asked-questions)**

Our Routes

ROUTE 1: FAMU'S EFFERSON STUDENT UNION VIA FAMU WELCOME CENTER

ROUTE 2: DONALD L. TUCKER CENTER

ROUTE 3: LEON COUNTY COURTHOUSE



TLH Votes Coalition

This event is brought to you by:

Campus Election Engagement Project

FAMU Fraternity & Sorority Life

FAMU's Efferson Student Union

Florida PIRG Students

FSU's Center for Leadership & Social Change

FSU Campus Recreation

League of Women Voters

facebook

Log In



Stroll to the Polls

October 17, 2020 · 🌐

Plan Your Vote #Florida! <https://dos.myflorida.com/elections/for-voters/>

#StrollToThePolls #GOTV #VoteEarly #VoteInPerson #Vote

Exhibit

5



PLAN YOUR VOTE

CHECK YOUR
REGISTRATION



REGISTER TO VOTE



MAIL IN VOTE

GET BALLOT FROM
ELECTIONS BOARD



COMPLETE
YOUR BALLOT



RETURN BALLOT TO
ELECTIONS BOARD



OR

VOTE IN PERSON EARLY OR ON NOV. 3RD

FIND YOUR POLLING PLACE



GO VOTE!



Like

Comment

Log in or sign up for Facebook to connect with friends, family and people y...

Log In

or

Create new account

STTP005-1

facebook

Log In



Stroll to the Polls

October 17, 2020 · 🌐

<https://dos.myflorida.com/elections/for-voters/voting/>

#Florida #StrollToThePolls #GOTV #Vote #VoteEarly #VoteInPerson #PlanYourVote



Like

Comment

Log in or sign up for Facebook to connect with friends, family and people y...

Log In

or

Create new account

STTP005-2

facebook

Log In



Stroll to the Polls

October 17, 2020 · 🌐

Get your gear ready & Go Vote #Florida! 🇺🇸

<https://dos.myflorida.com/.../check-your-voter-status.../>

#StrollToThePolls #GOTV #Vote #VoteEarly #VoteInPerson #PlanYourVote



PACK A MEAL



BRING A CHAIR



GLOVE UP



MASK UP



VOTE

STROLLTOTHEPOLLS.ORG



Like



Comment

Log in or sign up for Facebook to connect with friends, family and people y...

Log In

or

Create new account

STTP-005-3

7/25/2024, 3:12 AM

facebook

Log In



Stroll to the Polls

October 17, 2020 · 🌐

Want to #VoteByMail? Here are tips on completing your #MailInBallot in #Florida 🇺🇸
<https://dos.myflorida.com/.../for.../voting/vote-by-mail/>
#MailInVote #VoteAtHome #VoteAbsentee #StrollToThePolls #GOTV #Vote #VoteEarly
#VoteInPerson

Like

Comment

Log in or sign up for Facebook to connect with friends, family and people y...

Log In

or

Create new account

STTP205-4

Exhibit C

Generated on: This page was generated by TSDR on 2024-10-27 19:07:31 EDT

Mark: SOAR TO THE POLLS IT'S A SERIOUS MATTER



US Serial Number: 97722458

Application Filing Date: Dec. 19, 2022

US Registration Number: 7390472

Registration Date: May 21, 2024

Register: Principal

Mark Type: Trademark, Service Mark

TM5 Common Status Descriptor:



LIVE/REGISTRATION/Issued and Active

The trademark application has been registered with the Office.

Status: Registered. The registration date is used to determine when post-registration maintenance documents are due.

Status Date: May 21, 2024

Publication Date: Mar. 05, 2024

Mark Information

Mark Literal Elements: SOAR TO THE POLLS IT'S A SERIOUS MATTER

Standard Character Claim: No

Mark Drawing Type: 3 - AN ILLUSTRATION DRAWING WHICH INCLUDES WORD(S)/ LETTER(S) /NUMBER(S)

Description of Mark: The mark consists of the word "SOAR" positioned center above the words " TO THE POLLS" and to the right of "SOAR" are the words "ITS A SERIOUS MATTER" all words in green, and a pink arrow which tail starts from the center of "THE" and extends in an upward arc to the right of "its a serious matter".

Color Drawing: Yes

Color(s) Claimed: The color(s) pink and green is/are claimed as a feature of the mark.

Design Search Code(s): 24.15.25 - Other arrows

Goods and Services

Note:

The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((.)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks *..* identify additional (new) wording in the goods/services.

For: printed matter, namely, pamphlets and books featuring information about voting and graphics to encourage others to vote

International Class(es): 016 - Primary Class

U.S Class(es): 002, 005, 022, 023, 029, 037, 038, 050

Class Status: ACTIVE

Basis: 1(a)

First Use: Oct. 10, 2022

Use in Commerce: Oct. 10, 2022

For: providing information on how to create a voting plan and checklist for the purpose of knowing how to register voters

International Class(es): 035 - Primary Class

U.S Class(es): 100, 101, 102

Class Status: ACTIVE

Basis: 1(a)

First Use: Oct. 10, 2022

Use in Commerce: Oct. 10, 2022

Basis Information (Case Level)

Filed Use: Yes

Filed ITU: No

Filed 44D: No

Filed 44E: No

Filed 66A: No

Filed No Basis: No

Currently Use: Yes

Currently ITU: No

Currently 44D: No

Currently 44E: No

Currently 66A: No

Currently No Basis: No

Current Owner(s) Information

Owner Name: Alpha Kappa Alpha Sorority

Owner Address: 5656 S. Stony Island Avenue
Chicago, ILLINOIS UNITED STATES 60637

Legal Entity Type: non-profit corporation

State or Country DISTRICT OF COLUMBIA
Where Organized:

Attorney/Correspondence Information

Attorney of Record

Attorney Name: John S. Kendall

Docket Number: Soar 2 Polls

Attorney Primary john06@patentcopyright.net
Email Address:

Attorney Email Yes
Authorized:

Correspondent

Correspondent John S. Kendall
Name/Address: LAW OFF OF JOHN S. KENDALL PC
27 N. WACKER DRIVE
SUITE 528
CHICAGO, ILLINOIS UNITED STATES 60130

Phone: 312-543-1989

Correspondent e-mail: john06@patentcopyright.net azubuike@interserv.com

Correspondent e-mail Yes
Authorized:

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
May 21, 2024	NOTICE OF REGISTRATION CONFIRMATION EMAILED	
May 21, 2024	REGISTERED-PRINCIPAL REGISTER	
Mar. 05, 2024	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
Mar. 05, 2024	PUBLISHED FOR OPPOSITION	
Feb. 14, 2024	OFFICIAL GAZETTE PUBLICATION CONFIRMATION E-MAILED	
Feb. 14, 2024	NOTIFICATION OF NOTICE OF PUBLICATION E-MAILED	
Jan. 26, 2024	APPROVED FOR PUB - PRINCIPAL REGISTER	
Jan. 26, 2024	EXAMINER'S AMENDMENT ENTERED	
Jan. 26, 2024	NOTIFICATION OF EXAMINERS AMENDMENT E-MAILED	
Jan. 26, 2024	EXAMINERS AMENDMENT E-MAILED	
Jan. 26, 2024	EXAMINERS AMENDMENT -WRITTEN	
Oct. 12, 2023	NOTIFICATION OF NON-FINAL ACTION E-MAILED	
Oct. 12, 2023	NON-FINAL ACTION E-MAILED	
Oct. 12, 2023	NON-FINAL ACTION WRITTEN	
Oct. 07, 2023	TEAS/EMAIL CORRESPONDENCE ENTERED	
Oct. 07, 2023	CORRESPONDENCE RECEIVED IN LAW OFFICE	
Oct. 07, 2023	TEAS RESPONSE TO OFFICE ACTION RECEIVED	
Sep. 22, 2023	NOTIFICATION OF NON-FINAL ACTION E-MAILED	
Sep. 22, 2023	NON-FINAL ACTION E-MAILED	
Sep. 22, 2023	NON-FINAL ACTION WRITTEN	
Sep. 20, 2023	ASSIGNED TO EXAMINER	

Jan. 17, 2023NOTICE OF DESIGN SEARCH CODE E-MAILED

Jan. 15, 2023NEW APPLICATION OFFICE SUPPLIED DATA ENTERED

Dec. 22, 2022NEW APPLICATION ENTERED

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: FILE REPOSITORY (FRANCONIA)Date in Location: May 21, 2024



UNITED STATES PATENT AND TRADEMARK OFFICE (USPTO)

Commissioner for Trademarks
www.uspto.gov

OFFICIAL USPTO NOTICE OF PUBLICATION UNDER 12(a)

U.S. Application Serial No. 97722458

Mark: SOAR TO THE POLLS IT'S A SERIOUS MATTER

International Class(es): 016, 035

Owner: Alpha Kappa Alpha Sorority

Docket/Reference No. Soar 2 Polls

Issue Date: February 14, 2024

Your mark is scheduled to publish in the *Trademark Official Gazette (TMOG)* on March 05, 2024.

Your mark appears to be entitled to register on the Principal Register, subject to any claims of concurrent use.

What happens when your mark publishes. Within 30 days of the publication date, any party who believes it will be damaged by the registration of the mark may file a notice of opposition (or extension of time) with the Trademark Trial and Appeal Board. If no objection is filed, we will issue a registration.

View your mark in the TMOG after the publication date at <https://tmog.uspto.gov/> by selecting your publication date in the "issues" field, entering your serial number in the "search by" field, and clicking on the magnifying glass.

Ensure that the information in the TMOG is correct. If any information is incorrect, promptly request correction using the "Post-Approval/Publication/Post-Notice of Allowance (NOA) Amendment" form at <https://teas.uspto.gov/office/ppa/>. For more information, see <https://www.uspto.gov/trademark/trademark-updates-and-announcements/procedures-submitting-amendmentscorrections-trademark>.

Direct questions about this notice to the Trademark Assistance Center (TAC) at 1-800-786-9199 (select option 1) or TrademarkAssistanceCenter@uspto.gov.

Email Address(es):

XXXX

From: TMOfficialNotices@USPTO.GOV
Sent: Wednesday, February 14, 2024 05:41:21 EST
To: XXXX
Subject: Official USPTO Notification: U.S. Trademark Application SN 97722458 -- Docket/Reference No. Soar 2 Polls

NOTIFICATION OF "NOTICE OF PUBLICATION"

Your trademark application (U.S. Serial No.97722458) is scheduled to publish in the *Official Gazette* on Mar 05, 2024. To preview the Notice of Publication, go to the Trademark Status & Document Retrieval (TSDR) database, accessible at <https://tsdr.uspto.gov/search.action?sn=97722458>. If you have difficulty accessing the Notice of Publication, contact the Trademark Assistance Center (TAC) by e-mail at TrademarkAssistanceCenter@uspto.gov or by telephone at 800-786-9199.

PLEASE NOTE:

1. The Notice of Publication may not be immediately available but will be viewable within 24 hours of this e-mail notification.
2. You will receive a second e-mail on the actual "Publication Date," which will include a link to the issue of the *Official Gazette* in which the mark has published.

Please confirm that the correspondence information shown in TSDR is correct. If the correspondence information is not correct, please update this information using the online Change of Correspondence Address Form, accessible at <https://teas.uspto.gov/ccr/cca>.

Do NOT hit "Reply" to this e-mail notification. If you find an error in the Notice of Publication, update the information using the Post-Approval/Publication/Post-Notice of Allowance (NOA) Amendment Form, accessible at <https://teas.uspto.gov/office/ppa>.

To: John S. Kendall(john06@patentcopyright.net)
Subject: U.S. Trademark Application Serial No. 97722458 - SOAR TO THE POLLS
IT'S A SERIOUS MATTER - Soar 2 Polls
Sent: October 12, 2023 03:49:33 PM EDT
Sent As: tmng.notices@uspto.gov

Attachments

United States Patent and Trademark Office (USPTO)
Office Action (Official Letter) About Applicant's Trademark Application

U.S. Application Serial No. 97722458

Mark: SOAR TO THE POLLS IT'S A SERIOUS MATTER

Correspondence Address:

John S. Kendall
LAW OFF OF JOHN S. KENDALL PC
27 N. WACKER DRIVE
SUITE 528
CHICAGO IL 60130
United States

Applicant: Alpha Kappa Alpha Sorority

Reference/Docket No. Soar 2 Polls

Correspondence Email Address: john06@patentcopyright.net

NONFINAL OFFICE ACTION

Response deadline. File a response to this nonfinal Office action within three months of the “Issue date” below to avoid [abandonment](#) of the application. Review the Office action and respond using one of the links to the appropriate electronic forms in the “How to respond” section below.

Request an extension. For a fee, applicant may [request one three-month extension](#) of the response deadline prior to filing a response. The request must be filed within three months of the “Issue date” below. If the extension request is granted, the USPTO must receive applicant’s response to this letter within six months of the “Issue date” to avoid abandonment of the application.

Issue date: October 12, 2023

RESPONSE DEADLINE: WITHIN THREE MONTHS FROM THE ISSUE DATE ABOVE

This responds to applicant’s communication filed on October 7, 2023. In the aforementioned communication, applicant submitted an amended identification for Class 35 and added Classes 09 and

16 to the application.

The amended identification for Class 35 and addition of Class 16 are acceptable and those requirements are now satisfied. *See* TMEP §713.02, 714.04.

The addition of Class 09 raises the new refusal.

Specimen Refusal: Class 09

Registration is refused because the specimen does not show the applied-for mark as actually used in commerce in connection with any of the goods and/or services specified in International Class(es) 09. Trademark Act Sections 1 and 45, 15 U.S.C. §§1051, 1127; 37 C.F.R. §§2.34(a)(1)(iv), 2.56(a); *In re Keep A Breast Found.*, 123 USPQ2d 1869, 1876-79 (TTAB 2017); TMEP §§904, 904.07(a), 1301.04(d), (g)(i). An application based on Trademark Act Section 1(a) must include a specimen showing the applied-for mark as actually used in commerce for each international class of goods and/or services identified in the application or amendment to allege use. 15 U.S.C. §1051(a)(1); 37 C.F.R. §§2.34(a)(1)(iv), 2.56(a); TMEP §§904, 904.07(a); *see In re Gulf Coast Nutritionals, Inc.*, 106 USPQ2d 1243, 1247 (TTAB 2013).

Specifically, the submitted specimens show applicant's services in Class 35 and printed pamphlets in Class 16; however, the specimens do not show any downloadable pamphlets or books in Class 09.

Specimens for goods include a photograph of (1) the actual goods bearing the mark; (2) an actual container, packaging, tag or label for the goods bearing the mark; or (3) a point-of-sale display showing the mark directly associated with the goods. *See* 37 C.F.R. §2.56(b)(1), (c); TMEP §904.03(a)-(m). A webpage specimen submitted as a display associated with the goods must show the mark in association with a picture or textual description of the goods and include information necessary for ordering the goods. TMEP §904.03(i); *see* 37 C.F.R. §2.56(b)(1), (c).

Specimens for services must show a direct association between the mark and the services and include: (1) copies of advertising and marketing material, (2) a photograph of business signage or billboards, or (3) materials showing the mark in the sale, rendering, or advertising of the services. *See* 37 C.F.R. §2.56(b)(2), (c); TMEP §1301.04(a), (h)(iv)(C).

Any webpage printout or screenshot submitted as a specimen must include the webpage's URL and the date it was accessed or printed on the specimen itself, within the TEAS form that submits the specimen, or in a verified statement under 37 C.F.R. §2.20 or 28 U.S.C. §1746 in a later-filed response. *See* 37 C.F.R. §2.56(c); TMEP §§904.03(i), 1301.04(a).

Response options. Applicant may respond to this refusal by satisfying one of the following for each applicable international class:

- (1) Submit a different specimen (a verified [“substitute” specimen](#)) that (a) was in actual use in commerce at least as early as the filing date of the application or prior to the filing of an amendment to allege use and (b) shows the mark in actual use in commerce for the goods and/or services identified in the application or amendment to allege use. A “verified substitute specimen” is a specimen that is accompanied by the following statement made in a signed affidavit or supported by a declaration under 37 C.F.R. §2.20: “The substitute (or new, or originally submitted, if appropriate) specimen(s) was/were in use in commerce at

least as early as the filing date of the application or prior to the filing of the amendment to allege use.” The substitute specimen cannot be accepted without this statement.

(2) Amend the filing basis to [intent to use under Section 1\(b\)](#) (which includes withdrawing an amendment to allege use, if one was filed), as no specimen is required before publication. This option will later necessitate additional fee(s) and filing requirements, including a specimen.

For an overview of the response options referenced above and instructions on how to satisfy these options using the online Trademark Electronic Application System (TEAS) form, see the [Specimen webpage](#).

Closing Guidelines - Partial Abandonment Advisory

For this application to proceed, applicant must explicitly address each refusal and/or requirement in this Office action. For a refusal, applicant may provide written arguments and evidence against the refusal, and may have other response options if specified above. For a requirement, applicant should set forth the changes or statements. Please see “[Responding to Office Actions](#)” and the informational [video “Response to Office Action”](#) for more information and tips on responding.

If applicant does not timely respond to this Office action, the following class(es) will be **deleted** from the application: Class 09. *See* 37 C.F.R. §2.65(a); TMEP §718.02(a).

In such case, the application will then proceed with the following class(es) **only**: Classes 16 and 35. *See* TMEP §718.02(a).

The term “TMEP” refers to the USPTO’s [Trademark Manual of Examining Procedure](#), a manual written by USPTO trademark attorneys that explains the laws and procedures applicable to the trademark application, registration, and post-registration processes. The USPTO updates the TMEP periodically to reflect changes in law, policy, and procedure.

An applicant may check the status of or view documents filed in an application or registration using the [Trademark Status and Document Retrieval \(TSDR\)](#) system. Enter the application serial number or registration number and click on “Status” or “Documents.”

Please call or email the assigned trademark examining attorney with questions about this Office action. Although an examining attorney cannot provide legal advice, the examining attorney can provide additional explanation about the refusal(s) and/or requirement(s) in this Office action. *See* TMEP §§705.02, 709.06.

The USPTO does not accept emails as responses to Office actions; however, emails can be used for informal communications and are included in the application record. *See* 37 C.F.R. §§2.62(c), 2.191; TMEP §§304.01-.02, 709.04-.05.

- To check the status of an application/registration, please visit [Trademark Status & Document Retrieval \(uspto.gov\)](#)
- For online forms and responses, please visit [Response forms | USPTO](#)
- For a process overview, please visit [Trademark process | USPTO](#)

- For general non-legal information or technical support, please visit [Trademark Assistance Center | USPTO](#)

How to respond. File a [response form to this nonfinal Office action](#) or file a [request form for an extension of time to file a response](#).

/Dannean Hetzel/
Dannean Hetzel
Trademark Attorney
Law Office 106
(571) 272-8858
Dannean.Hetzel@USPTO.GOV

RESPONSE GUIDANCE

- **Missing the deadline for responding to this letter will cause the application to [abandon](#).** A response or extension request must be received by the USPTO before 11:59 p.m. **Eastern Time** of the last day of the response deadline. Trademark Electronic Application System (TEAS) [system availability](#) could affect an applicant's ability to timely respond. For help resolving technical issues with TEAS, email TEAS@uspto.gov.
- **[Responses signed by an unauthorized party](#)** are not accepted and can **cause the application to [abandon](#)**. If applicant does not have an attorney, the response must be signed by the individual applicant, all joint applicants, or someone with [legal authority to bind a juristic applicant](#). If applicant has an attorney, the response must be signed by the attorney.
- If needed, **find [contact information for the supervisor](#)** of the office or unit listed in the signature block.

United States Patent and Trademark Office (USPTO)

USPTO OFFICIAL NOTICE

Office Action (Official Letter) has issued
on October 12, 2023 for
U.S. Trademark Application Serial No. 97722458

A USPTO examining attorney has reviewed your trademark application and issued an Office action. You must respond to this Office action to avoid your application abandoning. Follow the steps below.

- (1) **[Read the Office action](#)**. This email is NOT the Office action.
- (2) **Respond to the Office action by the deadline** using the Trademark Electronic Application System (TEAS). Your response, or extension request, must be received by the USPTO on or before 11:59 p.m. **Eastern Time** of the last day of the response deadline. Otherwise, your application will be [abandoned](#). See the Office action itself regarding how to respond.
- (3) **Direct general questions** about using USPTO electronic forms, the USPTO [website](#), the application process, the status of your application, and whether there are outstanding deadlines to the [Trademark Assistance Center \(TAC\)](#).

After reading the Office action, address any question(s) regarding the specific content to the USPTO examining attorney identified in the Office action.

GENERAL GUIDANCE

- **[Check the status](#) of your application periodically** in the [Trademark Status & Document Retrieval \(TSDR\)](#) database to avoid missing critical deadlines.
- **[Update your correspondence email address](#)** to ensure you receive important USPTO notices about your application.
- **[Beware of trademark-related scams](#)**. Protect yourself from people and companies that may try to take financial advantage of you. Private companies may call you and pretend to be the USPTO or may send you communications that resemble official USPTO documents to trick you. We will never request your credit card number or social security number over the phone. Verify the correspondence originated from us by using your serial number in our database, [TSDR](#), to confirm that it appears under the “Documents” tab, or contact the [Trademark Assistance Center](#).
- **[Hiring a U.S.-licensed attorney](#)**. If you do not have an attorney and are not required to

have one under the trademark rules, we encourage you to hire a U.S.-licensed attorney specializing in trademark law to help guide you through the registration process. The USPTO examining attorney is not your attorney and cannot give you legal advice, but rather works for and represents the USPTO in trademark matters.