

SUPERIOR COURT OF VANDERBURGH COUNTY

-----x
ANGELA BULLOCK,

Plaintiff,

SHONA JARBOE,

Plaintiff,

- against -

TANISHA CAROTHERS,

Defendant.
-----x

VANDERBURGH SUPERIOR COURT
★ FILED ★

FEB 07 2025

COMPLAINT

COMPLAINT FOR DECLARATORY RELIEF AND QUO WARRANTO ACTION

Comes now the Plaintiffs, Angela Bullock and Shona Jarboe for their Complaint against Defendant Tanisha Carothers, state and allege as follows:

INTRODUCTION AND BACKGROUND

1. This action arises under Indiana Code §§ 3-8-1-1, 3-8-1-5.7, and 3-8-1-27, as well as Indiana Code § 34-17-1-1, which governs quo warranto proceedings to challenge an individual’s unlawful assumption of public office. Plaintiffs Angela Bullock and Shona Jarboe, both residents of the Fourth Ward of Evansville, Vanderburgh County, Indiana, bring this action to contest the Defendant’s unlawful appointment as Fourth Ward City Councilperson and to seek her removal from office.

2. The Defendant, Tanisha Carothers, failed to satisfy Indiana’s statutory requirements for voter registration and residency at the time of her candidacy and was, therefore, ineligible to assume the office. Nevertheless, she was improperly appointed through the Democratic Party’s caucus process on November 9, 2024 and has since exercised the duties of the office unlawfully.

3. Under Indiana law, a candidate for local office must be a registered voter in the district before filing a declaration of candidacy. Additionally, Indiana Code § 3-7-13-10 requires that a voter registration change take effect at least 29 days before an election. Defendant Carothers failed to meet these requirements.

4. The relevant events leading to this action are as follows:

- a. October 30, 2024: Upon learning of Carothers's candidacy, Plaintiff Bullock filed a CAN-1 Candidate Filing Challenge contesting Carothers's qualifications based on residency and voter registration. At that time, Carothers was still registered to vote in the Third Ward.
- b. November 1, 2024: Carothers signed a CEB-5 declaration of candidacy, falsely asserting that she was a registered voter in the Fourth Ward, despite all official records indicating that she remained registered in the Third Ward.
- c. November 2, 2024: Carothers filed a voter registration application changing her address to [REDACTED] within the Fourth Ward. However, this registration change did not comply with the 29-day requirement under IC 3-7-13-10, making her ineligible to be considered a valid resident of the ward for the purpose of the election.
- d. November 5, 2024: Carothers did not vote in the general election, further raising concerns about her residency and voter registration status.
- e. November 9, 2024: The Democratic Party held a caucus to select a new Fourth Ward City Councilperson. Despite clear evidence of Carothers's ineligibility, no discussion of her qualifications was permitted before the vote, and she was improperly declared the winner.
- f. November 11, 2024: Democratic Party Chair Cheryl Schultz signed a CEB-4 Certificate of Appointment for Carothers. On the same day, Carothers completed a CAN-12 Statement of Economic Interests, and Marsha Abell signed a CEB-22 Certificate of Selection, followed by the execution of an oath of office by the deputy clerk.

5. Plaintiffs assert that, pursuant to Indiana Code § 3-8-1-1, Carothers was not a legally registered voter in the Fourth Ward at the time of her candidacy declaration. Further, under IC 3-8-1-5.7, which governs appointments to local offices, Carothers's voter registration change did not take effect in time to satisfy the 29-day requirement.

6. As a result, Carothers was not legally qualified to seek or assume office. Plaintiffs therefore bring this quo warranto action under Indiana Code § 34-17-1-1 to remove Defendant from office and to ensure compliance with Indiana's election laws.

JURISDICTION AND VENUE

7. This Court has jurisdiction over this matter pursuant to Indiana Code § 34-17-1-1, which authorizes quo warranto actions to challenge an individual's unlawful assumption of public office.

8. Venue is proper in Vanderburgh County Superior Court under Indiana Trial Rule 75, as the events giving rise to this action occurred within Vanderburgh County, and Defendant currently holds public office in this jurisdiction.

PARTIES

9. Plaintiff Angela Bullock is a resident of the Fourth Ward of Evansville, Vanderburgh County, Indiana, and a registered voter. She filed for candidacy in the Democratic caucus for Fourth Ward City Council but was improperly denied the position due to Defendant's unlawful appointment.

10. Plaintiff Shona Jarboe is a resident and registered voter of the Fourth Ward. She brings this action as a constituent who has suffered the loss of lawful representation in her district due to Defendant's unlawful appointment.

11. Defendant Tanisha Carothers is an attorney and a resident of Evansville, Indiana, who was improperly appointed to the Fourth Ward City Council seat despite not meeting statutory eligibility requirements.

Count I – Violation of Indiana Code § 3-8-1-1 (Failure to Meet Candidate Eligibility Requirements)

12. Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

13. Indiana Code § 3-8-1-1 requires that a candidate for local office be a registered voter in the district before filing a declaration of candidacy.

14. Defendant Carothers was not a registered voter in the Fourth Ward at the time of her CEB-5 filing on November 1, 2024, and therefore did not meet the statutory requirements to be considered a valid candidate.

15. As a result, Defendant's assumption of office was unlawful.

Count II – Violation of Indiana Code § 3-8-1-5.7

(Appointment to Local Office Without Meeting Registration Deadline)

16. Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

17. Indiana Code § 3-8-1-5.7 governs appointments to local offices and incorporates the 29-day voter registration cutoff outlined in IC 3-7-13-10.

18. Defendant changed her voter registration on November 2, 2024, which was too late to satisfy the 29-day deadline for eligibility in the caucus.

19. Because Defendant's voter registration was not effective for purposes of the caucus election, her appointment was unlawful.

**Count III – Violation of Indiana Code § 3-8-1-27
(Residency Requirements Not Satisfied)**

20. Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

21. Indiana Code § 3-8-1-27 requires a candidate to be a bona fide resident of the district they seek to represent.

22. Defendant Carothers's last known voter registration and residency records indicate that she did not lawfully reside in the Fourth Ward at the time of her candidacy declaration.

23. Defendant's last-minute change of address does not satisfy Indiana's legal standard for residency, making her ineligible for office.

**Count IV – Unlawful Assumption of Office Under Indiana Code § 34-17-1-1
(Quo Warranto Action)**

24. Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

25. Indiana law provides that a quo warranto action may be brought when a person unlawfully holds a public office.

26. Defendant Carothers was ineligible to assume office at the time of her appointment, rendering her occupancy of the Fourth Ward City Council seat unlawful.

27. Plaintiffs, as registered voters and directly affected constituents, seek her removal through this action.

RELIEF REQUESTED

WHEREFORE, Plaintiffs respectfully request that this Court:

- Declare that Defendant was ineligible to seek or hold the office of Fourth Ward City Councilperson
- Order Defendant's removal from office and declare the seat vacant;
- Issue a judicial record documenting Defendant's unlawful assumption of office;
- Enjoin Defendant from seeking or holding this position in the future;
- Grant such other and further relief as the Court deems just and proper.

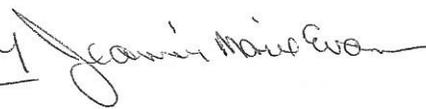
Dated: February 6, 2025



Angela Bullock [Printed]
Plaintiff
[REDACTED]
Evansville, Indiana 47713



Shona Jarboe [Printed]
Plaintiff
[REDACTED]
Evansville, Indiana 47713

Notary 

JEANNIE MARIE EVANS
NOTARY PUBLIC
SEAL
VANDERBURGH CO., STATE OF INDIANA
COMMISSION NUMBER 714113
MY COMMISSION EXPIRES JUNE 5, 2026

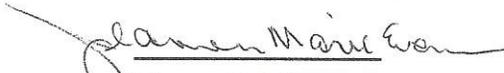
VERIFICATION

Shona Jarboe, being duly sworn, deposes and says:

I am the plaintiff in the above-entitled action. I have read the foregoing complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters I believe them to be true.

 [Signature]
Shona Jarboe [Printed]
Plaintiff

Sworn to before me this
6th day of February 2025

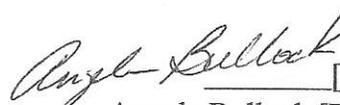

Notary Public

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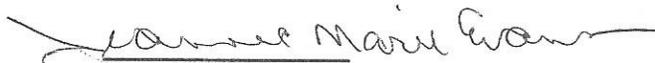
VERIFICATION

Angela Bullock, being duly sworn, deposes and says:

I am the plaintiff in the above-entitled action. I have read the foregoing complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters I believe them to be true.

 [Signature]
Angela Bullock [Printed]
Plaintiff

Sworn to before me this
6th day of February 2025


Notary Public

JEANNIE MARIE EVANS
NOTARY PUBLIC
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VANDERBURGH CO., STATE OF INDIANA
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