

BEFORE THE STATE BOARD OF EDUCATION  
OF THE COMMONWEALTH OF KENTUCKY.

BALLARD HUNTER, INDIVIDUALLY AND AS A  
CITIZEN AND TAXPAYER OF FLOYD COUNTY,  
KENTUCKY, AND

BALLARD HUNTER, SUPERINTENDENT OF SCHOOLS  
OF FLOYD COUNTY, KENTUCKY,

PLAINTIFFS.

AGAINST :: CHARGES.

HAROLD BAILEY, MEMBER OF BOARD OF EDUCATION  
OF FLOYD COUNTY, KENTUCKY,

DEFENDANTS.

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The plaintiff, Ballard Hunter, says that he is a citizen, resident and taxpayer of Floyd County, Kentucky; that he is also the duly elected, qualified and acting Superintendent of Schools of Floyd County, Kentucky, and that he prefers the charges hereinafter set out against the defendant, Harold Bailey, in his individual capacity as a citizen and taxpayer of Floyd County, Kentucky, and in his official capacity as Superintendent of Schools of Floyd County, Kentucky.

That heretofore, and at the November election, 1935, the defendant, Harold Bailey, was elected as a member of the Board of Education of Floyd County, Kentucky, for a term of four years from and ensuing the first Monday of January, 1936; and since the first Monday of January 1936 has been a duly elected and acting member of the Board of Education of Floyd County, Kentucky.

The plaintiff charges that the defendant, Harold Bailey, is incompetent to serve as a member of the Board of Education of Floyd County, Kentucky, in that the said Harold Bailey has not completed at least the eighth grade in the common schools as required by Section