STATE OF NORTH CAROLINA	**IN THE GENERAL COURT OF JUSTICE**
	DISTRICT COURT DIVISION
COUNTY OF HARNETT	**FILE NO.:** 26CV000657-420

TRAVIS BILL,	
guardian ad litem for Hunter Bill	
Plaintiff,	
v.	**COMPLAINT**
NCHSSA	
ANDY MCCORMICK, in his individual capacity	
Defendants.	

NOW COMES Plaintiff, by and through the undersigned counsel, complaining of Defendants and alleging as follows:

FACTS

1. Plaintiff is a citizen and resident of the County of Harnett, North Carolina and the duly appointed Guardian ad Litem for the minor Hunter Bill.

2. Defendant NCHSSA is a non-profit organization duly organized and existing under the laws of the State of North Carolina whose registered agent is Marilyn Q. Tucker, 222Finley Golf Course Road, Chapek Hill, NC 27517 (Mailing: PO Box 3216, Chapel Hill, NC 27515)

3. Defendant Andy McCormick is a citizen and resident of the State of North Carolina.

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4. The Court has jurisdiction over the parties and subject matter of the disputes alleged herein.

5. On February 13, 2026, Harnett Central High School student-athlete Hunter Bill was a participant at the 6A Regional for NCHSSA Wrestling held at Union Pines High School (the "Tournament").

6. Rules applicable to, and governing, the Tournament were those as outlined herein, Defendants violated the ward's rights including due process, equal protection, and other rights as protected under North Carolina law and as outlined in the 2025-26 NFHS Wrestling Rules Book.

7. Harnett Central High School had multiple male and female wrestlers competing at the Tournament.

8. One of the male wrestlers was the ward Hunter Bill, a junior at Harnett Central High School.

9. During Hunter's first match on February 13, 2026, he faced an opponent from East Chapel Hill.

10. In the third period of the match with approximately 37 seconds left, the wrestlers went off the mat as Hunter was attempting a takedown and both wrestlers lightly shoved each other and returned to the center. When the wrestlers returned, it appears from Hunter's reaction that the referee made some comment to Hunter who then gestured and asked "against me" or something similar.

11. The referee did not signal any offense and did not make known what he was calling or indicating, if anything. Hunter went on to pin his opponent with very little time left in the match, the wresters and the referee returned to the center of the mat and the referee raised Hunter's hand as the winner.

12. Harnett Central coaches then went on to coach other matches of the Harnett Central boy's team and at some point later in time an announcement was made for a Harnett Central Coach to come to the head tournament table.

13. Head Coach Brandon Bishop went to the head tournament table and, at some point just moments later, assistant Coach Travis Bill also went to the table. The

head official was present and at this point Coaches Bishop and Bill were informed, for the first time, that Hunter Bill received two unsportsmanlike penalties and said that this results in Hunter's disqualification. This was the first time anyone indicated either than any unsportsmanlike penalties were assessed or that Hunter was supposedly disqualified. This decision was reported to Hunter's coaches after the match, after Hunter was announced the winner of the match and after other matches had passed since Hunter's match.

14. The coaches asked the head official the reason for the unsportsmanlike calls and were informed that it was unknown to the head official but supposedly reported to the scorer's table by the match referee. The coaches again asked for clarification on the reason for the penalties and the head official did not know as he was not involved in the match. At this point Harnett Central Assistant Coach Robert Buzzard also arrived at the head table. Coach Buzzard was also present during Hunter's match and sat at one of the two coaches' chairs along with coach Travis Bill. Coaches Buzzard and Bill noted to the head referee that at no point during the match were the coaches made aware that any penalties were being assessed nor were they signaled. The head official then responded that the referee does not need to inform the coaches or let them know in any way that an unsportsmanlike penalty is called and only needs to inform the scorer's table. The head referee checked with the scorer's table and noted that the penalties were assessed when 37 seconds were remaining in the match and at one second after the match. The coaches again noted than no indication of a penalty was given by the referee and again told by the head official that no signal is required and the coaches don't have to be made aware of an unsportsmanlike penalty. As matches were still ongoing, and the head table was in the middle of the gym, the head official asked the coaches to step into the hallway to discuss their options. The coaches then inquired again as to the reason for the penalties and the head official said he did not know but would check. The head official also noted that there was a method to appeal the disqualification. Coach Buzzard specifically asked to know the basis of the unsportsmanlike call made one second after the match and the head official said he would find out and report back. The head official returned and reported that the second penalty was allegedly because the referee told Hunter to stop talking and to him and that Hunter then said something to the referee about not calling the pin sooner. At this point, the coaches had watched video of the match and at no point in time did the referee appear to signal an unsportsmanlike penalty. In addition, there

was no significant interaction between Hunter and the referee after the pin was called. A copy of the video is attached for reference.

15. The coaches noted to the head referee that the video did not show an unsportsmanlike signal by the referee or Hunter having any back and forth with the referee after the match as the referee described. The head referee at this point noted that after consulting the rule book, there was no avenue for appeal as he previously thought. The coaches then inquired what could be done about the situation, given that no clear call or signal was made during the match of the penalty and the video did not support the referee's statement about a back and forth with Hunter and the official after the match.

16. At this point the individual defendant McCormick, Principal of Union Pines High School, approached the coaches and head referee who were discussing options and loudly stated to the effect, "there is no appeal, its over". This was the first time this Principal interjected himself in the situation. At this point, the coaches had no idea who Mr. McCormick was and he was clearly interfering with the discussion between the coaches and head referee.

17. Of note, Union Pines was one of the teams who had competitors. McCormick had absolutely no authority over the officiating of the matches, application of the wrestling rules, wrestling match penalties, appeals under the rules, or any authority whatsoever over the calls made during the match or appeals thereof.

18. When coaches continued to discuss options with the referee, McCormick continued to interfere with the discussion, interjected for any discussion to stop, and then threatened to have the coaches removed if they asked any more questions, noting that they would also then not be able to coach any of their other wrestlers in the tournament. It was clear at this point that the McCormick did not understand the rules issues being discussed or the requests of the coaches for possible remedies concerning the referee's decision.

19. At this point, due to the threat made by McCormick, the coaches abandoned the discussion with the head referee so that McCormick would not retaliate by forcing the coaches to leave the grounds, which would result in no coaches being there with the team, leaving the other wrestlers unable to compete and creating a safety issue for the students.

20. The Principal's involvement and threats lacked self-control, were inappropriate, and were uninformed. Further, his involvement in any decisions about the rules is in violation of the rules themselves and an extreme conflict of interest given his own team was a participant.

21. The head referee took no action to temper the interference of McCormick and stopped discussing the matter once McCormick threatened to have the coaches removed. If those spoke any further with the head referee.

THE RULES

22. The Tournament is governed by the rules in the 2025-26 NFHS Wrestling Rules Book (the "Rules").
23. These Rules were clearly violated and misapplied to wrestler Hunter Bill as outlined below, wrongly resulted in his disqualification from the tournament and from participation in the State Tournament.
24. The alleged calls for unsportsmanlike conduct are void as the referee did not properly call the violations.
25. The Defendants maintained that the referee called unsportsmanlike conduct on the word on two occasions, one :37 of the third period and one at :01. (See attached scoring sheet from the match which is attached as Exhibit A.)
26. Unsportsmanlike conduct is defined under the Rules at multiple places in the Rules book.
27. The Rules also defines unsportsmanlike conduct and separates the penalties for contestants based on those occurring during a match and not during the match.
28. Rule 5, Section 30, Art. 2 defines unsportsmanlike conduct by contestants.
29. Rule 7, Section 4, Art. 2 also defines unsportsmanlike conduct.
30. Rule 8, Section 1, Article 5 defines unsportsmanlike conduct "prior to or after conclusion of wrestling"
31. In order to make a call of unsportsmanlike conduct, the Rules require the referee to signal the violation by action to, "stop the match, use the appropriate NFHS signal and announce the penalty in the prescribed manner so that coaches, contestants, scorers and spectators are aware of the penalty," Rule 3, Article 10, (p. 13). (Note: there is an exception to stopping the match for violations of Rule 8-1-2 which are not violations relevant to this matter)
32. Further evidencing the importance of notice to the coaches of any violation is Rule 6-6, page 36, which provides the coach an opportunity to approach the

scorer's table when the coach believes the referee has misapplied a rule or disagrees with the referee's judgment. Clearly, this rule has no effect unless the coach is informed what the referee's decision is in regard to a point or penalty.

33. Rule 3, Art. 10 (p.13) – "When penalizing either wrestler, the referee shall stop the match, use the appropriate NFHS signal and announce the penalty in the prescribed manner so that coaches, contestants, scorers and spectators are aware of the penalty, except as noted in Rule 8-1-2."
34. Rule 3, Art 7 (p. 13) of the Rules states that only authorized signals are allowed for the award of points.
35. Per illustration 23 under the "Official Wrestling Signals" appendix in the Rulebook, Unsportsmanlike Conduct is signaled by the referee extending the left or right hand all the way out to the side with an open hand.
36. The Rules further categorize the punishments separately for unsportsmanlike conduct during a match and "not during a match".
37. Cumulative penalties for each are set out in two different sections of the penalty chart at page 44 of the Rule book. Four penalties are required of unsportsmanlike conduct during a match prior to disqualification.
38. Cumulative penalties for unsportsmanlike conduct not during a match have a separate section in the penalty chart and Rule 8-1 Article 5 (p.45) notes that an unsportsmanlike conduct penalty after the match results in one team point deduction and a second unsportsmanlike not during the match resulted in expulsion from the tournament.
39. The Rules are abundantly unclear how "not during a match" is defined but clearly appear clear to be referencing "not during a match" to occasions when non-contestants, coaches or others are involved in unsportsmanlike behavior. This is further clarified in Rule 7, Section4, Art. 2 where it discusses occurrences a match and includes "end of match procedure", specifically noting displeasure with a call and failure to keep should straps on.
40. Clearly, the end of match complaint by the ward, even if true, about the referee not calling the pin sooner, and even if unsportsmanlike conduct, is during the match according to the definitions in the Rules.
41. While Rule 5, Section 8 notes that disqualification is "one who is removed from participation in accordance with the Penalty Chart..." the ward was not disqualified after the alleged second offense and, in fact, his hand was raised as the winner.
42. A video of the actual match in question is attached as Exhibit B and hereby incorporated by reference.
43. As illustrated by the video evidence, the referee did not:

a. properly signal the unsportsmanlike conduct
b. 2) did not stop the match to note the violation
c. 3) did not note the violation "in a manner so that coaches, contestants, scorers and spectators" were aware of the penalty
d. assessment the second alleged unsportsmanlike during the match and
e. consistent with the penalty not being a disqualifying event, did not disqualify the ward but took him and the opponent to the center of the ring and raised the wards hand as victorious.

44. Rule 8-1 Article 5 (p.45) notes that an unsportsmanlike conduct penalty after the match results in one team point deduction and a second unsportsmanlike not during the match resulted in expulsion from the tournament.
45. Rule 8-1, penalty chart at p.44 – penalties during a match are separate and apart from outside the match and they have their own penalty assessments.
46. The calls of unsportsmanlike conduct, even if legitimately made and decided, do not result in disqualification under the rules.
47. If the two violations were during the match, as it appears from the video evidence and the definition of during the match under the Rules, then it is simply a one point award to the opponent and not a disqualifying event under the Rules as four penalties are required of unsportsmanlike conduct during a match prior to disqualification.
48. If the first violation was during the match and the second not during the match then the penalty is one point for the during the match violation and one team point deducted for the not during a match violation, and neither violation if a disqualifying event under the Rules.
49. The top three finishers at each weight at the Tournament qualify for the State Tournament.
50. As a result of the wards disqualification, he was ineligible to continue competing.
51. It is likely that the ward would have finished in at least the top 3 places, as he had easily defeated the ultimate second place finisher in his weight at the Tournament during this same wrestling season.
52. The decision reached was clearly erroneous under the rules and should be reversed immediately and Defendants required to place the ward into the State Tournament at an appropriate seeding.

53. The officials involved in this matter, including the match referee and the head referee violated the Officials Code of Ethics in that they did not master the rules and mechanics to enforce said rules.
54. In contrast to the treatment of the ward, another wrestler at the same Tournament who was on the host school's team (Union Pines) on information and belief cursed during the match, was disqualified, attempted to accost the referee, slammed his headgear and ran out of the gym was allowed after "reconsideration" by Tournament officials to continue to wrestle.
55. When Plaintiff attempted to inquire into the disparate treatment of the ward versus the Union Pines wrestler, the Tournament director charged at Plaintiff and threatened to have Plaintiff thrown off of the premises if he did not stop asking questions about said disparate treatment.
56. The State Tournament is scheduled for February 20-21, 2026 and any alternative claims or appeals, even if valid, would not provide an adequate remedy at law given the time frame for filing and hearing of appeals pursuant to NCHSAA, N.C.G.S. § 115C-407.55(4), 16 NCAC 06E .0204(m), and the Memorandum of Understanding between the North Carolina State Board of Education ("State Board") and the North Carolina High School Athletics Association ("NCHSAA").

AS A FIRST CAUSE OF ACTION FOR DENIAL OF DUE PROCESS

57. The foregoing paragraphs are hereby included by reference.
58. Under North Carolina law, a student may pursue a due process claim for denial of the right to participate in athletics if the denial implicates a fundamental right or if the procedures employed in the denial process fail to meet the requirements of procedural due process.
59. The North Carolina Constitution guarantees equal access to participation in the public school system as a fundamental right, protected by considerations of procedural due process . Sneed v. Greensboro Board of Education, 299 N.C. 609, Graham v. Mock, 143 N.C. App. 315, Leandro v. State, 346 N.C. 336. While public education itself is not a right under the U.S. Constitution, the North Carolina Constitution explicitly provides for equal access to education, and any restrictions on this right must be evaluated for procedural fairness in light of the parties, subject matter, and circumstances involved . Sneed v. Greensboro Board of Education, 299 N.C. 609, Graham v. Mock, 143 N.C. App. 315, Leandro v. State, 346 N.C. 336. This includes ensuring notice and an opportunity to be

heard in a meaningful manner, as procedural due process requires . Bunch v. Britton, 253 N.C. App. 659.

60. While North Carolina Courts have traditionally been reluctant to interfere with the internal affairs of voluntary associations, such as athletic organizations, the said Courts have undertaken such claims where the association fails to adhere to its own rules or invades a member's property or civil rights . Arendas v. N.C. High Sch. Ath. Ass'n, 217 N.C. App. 172. In , Arendas v. N.C. High Sch. Ath. Ass'n, 217 N.C. App. 172, the court affirmed the dismissal of a claim challenging the forfeiture of a basketball championship due to ineligible players, emphasizing the judiciary's limited role in reviewing the internal decisions of voluntary associations EXCEPT where procedural due process or adherence to rules is at issue . Arendas v. N.C. High Sch. Ath. Ass'n, 217 N.C. App. 172.
61. The violations as outlined herein illustrate the clear denial of participation involved procedural deficiencies and violates statutory protections. The procedures employed were unfair and the denial violated specific rules and rights guaranteed under the Rules of the governing body and North Carolina law.
61. The processes provided did not, and do not protect the ward's interests.
62. The ward had a protected interest, said interest was deprived by the inadequacy and unfairness of the process provided.
63. The ward is entitled to equal protection under the law.
64. The notice and opportunity to be heard were not reasonable and meaningful under the circumstances, and the deprivation was carried out in an unfair and unlawful manner
65. Defendants' violations of due process as outlined herein were the proximate cause of harm to the ward as outlined herein.

AS A SECOND CLAIM FOR BREACH OF CONTRACT

66. The foregoing paragraphs are re-alleged and hereby incorporated herein by reference.
67. The agreements in place with NCHSAA are tantamount to a contract with the student-athlete that they will agree to comply with the Rules.
68. The Defendant NCHSAA breached the Rules and, therefore, violated the contractual agreement with the student-athlete
69. The breach was the proximate cause of damage to the ward as outlined herein

AS THIRD CAUSE OF ACTION FOR INTEREFERENCE WITH CONTRACT

70. The foregoing paragraphs are re-alleged and hereby incorporated herein by reference.
71. As outlined herein, there was a valid a valid, enforceable contract between the plaintiff and NCHSAA; (2) the defendant McCormick knew of this contract; (3) the McCormick intentionally induced NCHSAA to breach or not perform the contract; (4) McCormick acted without justification; and (5) the plaintiff suffered actual damages as outlined herein.

AS A FOURTH CAUSE OF ACTION FOR NEGLIGENCE

72. The foregoing paragraphs are re-alleged and hereby incorporated herein by reference.
73. Defendant NCHSAA had a duty to comply with the Rules
74. NCHSAA breached its duty to the ward by failing to comply with the Rules and said breach proximately resulted in harm to the ward as outlined here.
75. McCormick had a duty to treat participants at the event fairly, impartially and equally.
76. McCormick breached said duty and said duty was the proximate cause of harm to the ward.

AS A FIFTH CAUSE OF ACTION FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

77. The foregoing paragraphs are re-alleged and hereby incorporated herein by reference.
78. McCormick engaged in extreme and outrageous conduct intended to cause harm and recklessly disregard the likelihood of causing severe emotional distress, which in fact proximately caused the ward severe emotional distress

AS A SIXTH CAUSE OF ACTION FOR NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

79. The foregoing paragraphs are re-alleged and hereby incorporated herein by reference.
80. McCormick individually and NCHSAA through their agents acted negligently as outlined herein, it was reasonably foreseeable this conduct would cause severe emotional distress, and the ward suffered severe, emotional distress as a direct and proximate result.

AS A SEVENTH CLAIM FOR NEGLIGENT MISREPRESENTATION

81. The foregoing paragraphs are re-alleged and hereby incorporated herein by reference.
82. Defendants supplied information to Plaintiff which Defendant intended Plaintiff to rely upon and Plaintiff reasonably relied upon the information.
83. The information relied upon was false.
84. Defendants failed to use reasonable care or competence in obtaining or communicating the information
85. Plaintiff's reliance caused harm to the Plaintiff and the ward

AS AN EIGHTH CLAIM FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY AND PERMANENT INJUNCTIONS

86. The foregoing paragraphs are re-alleged and hereby incorporated herein by reference.
87. Immediate and irreparable injury, loss, or damage will result to Plaintiff before the adverse parties or their attorney can be heard in opposition.
88. The actions sought are:
    a. Requiring the corporate Defendant to place the ward into the State Tournament at a seeding appropriate with a second place finish in the Tournament.
    b. Prevention of McCormick from interfering with any NCHSAA rulings, determinations, meetings, decisions, or other issues or rulings regarding the NC High School wrestling programs and events.
89. Defendants will not suffer any irreparable harm from the issuing of the restraining order and injunctions.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that this Court enter judgment as follows:

1. That Plaintiff have and recover of Defendants, jointly and severally, in the amount of Twenty-Five Thousand Dollars ($25,000.00) for compensatory damages;

2. That Defendants be taxed with the cost of this action, including reasonable attorney's fees;

3. For Temporary Restraining Order, Preliminary Injunction, and Permanent Injunction.

4. Plaintiff demands trial by jury; and

5. For such other and further relief as the Court deems just and proper under the circumstances.

This the 19th day of February 2026.

/s/ Freddie Cruz

Freddie Cruz
P.O. Box 365
Lillington, NC 27546
910-814-8777

VERIFICATION

I, **TRAVIS BILL,** being first duly sworn, deposes and says that I am the **Plaintiff** herein, that I have read the foregoing, **Complaint,** and know the statements therein to be true of my own personal knowledge, except as to those matters alleged upon information and belief, and as to those matters, I believe them to be true.

This the 19th day of February 2026.

TRAVIS BILL

STATE OF NORTH CAROLINA

COUNTY OF HARNETT

Sworn and subscribed personally before me this the 19th day of February 2026.

Notary Public

Print Name

CHERYL B. IRVIN NOTARY PUBLIC HARNETT COUNTY, NC

My Commission expires: 8-27-2030