

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

FILED
U.S. DISTRICT COURT
SAVANNAH DIV.

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Castell

COMMISSIONED II LOVE, SAVANNAH)
STATE UNIVERSITY CHAPTER, a student)
Organization at Savannah State University;)
LARINDA NORWOOD, individually and)
In her capacity as President of Commissioned)
II Love; and SATIN KINSEY-HICKS, individually)
And in her capacity as Vice President of)
Commissioned II Love.)

Plaintiffs,)

v.)

JULIUS S. SCOTT, JR., in his Official capacity as)
Interim President of Savannah State University,)
CARLTON E. BROWN, individually, RANDY)
GUNTER, individually and in his official capacity)
As Vice President for Student Affairs; IRVIN)
CLARK, individually and in his official capacity as)
Assistant Vice President for Student Affairs; GARY)
OLIVER, individually and in his official capacity as)
Director for Student Programs & Organizations; and)
MARILYN STACEY SUGGS, individually and in)
Her Capacity as a Hearings Officer.)

Defendants.)

CIVIL ACTION FILE
NO. CV-

CV407-036

VERIFIED COMPLAINT

Plaintiffs, the Savannah State University Chapter of Commissioned II Love, ("C2L"),
Larinda Norwood, and Satin Kinsey-Hicks, by and through counsel, and for their complaint
against Defendants, Dr. Julius S. Scott, Jr., Interim President of Savannah State University, Dr.
Carlton E. Brown, Dr. Randy Gunter, Dr. Irvin Clark, Gary Oliver, and Marilyn Stacey-Suggs,
state as follows:

INTRODUCTION

1. Savannah State University (“SSU”) exclaims in its Student Handbook that “[n]o rights are more highly regarded . . . than the first amendment guarantees of freedom of speech, freedom of expression, and the right to assemble peaceably” and further promises that SSU “will not exclude any person from participation in its programs or activities on the basis of . . . religion. . . .” Instead of upholding the exercise of these Constitutional rights and treating the Plaintiffs without regard to their religion, the Defendants have taken sides amongst students in a campus debate over religious belief and practice by using the power of the state to punish and prohibit C2L, a faith-based association, and its members from exercising their constitutional rights to the free exercise of religion, the freedom of speech, the right to peaceably assemble and to associate. Specifically, the Defendants have punished C2L and its members for ministering to other students, washing one another’s feet, assembling and praying, assembling and worshipping, wearing religious symbols, verbally responding to students who disagree with their religious beliefs and practices, and have permanently and effectively denied C2L and its members from enjoying all the rights, benefits and privileges of recognition as a SSU student organization. Furthermore, the Defendants have effectively prevented and/or chilled C2L and its members from engaging in these constitutionally protected activities.

2. This is a civil rights complaint brought by the Plaintiffs against the named Defendants at SSU for suspending C2L, expelling C2L, punishing C2L and its members for the exercise of their constitutionally protected rights and denying the same. Plaintiffs seek injunctive relief and declaratory relief pursuant to 42 U.S.C. §§ 1983 and 1988.

3. This action is premised on the United States Constitution concerning the deprivation of Plaintiffs’ constitutionally protected rights to the freedom of speech, the free

exercise of religion, freedom to peaceably assemble, and the right to expressive and intimate association.

4. Defendants' actions have deprived and will continue to deprive Plaintiffs of these rights protected by the United States Constitution.

5. Each and every act of Defendants alleged herein was committed under color of state law and authority.

JURISDICTION AND VENUE

6. Plaintiffs bring this civil rights action pursuant to 42 U.S.C. § 1983 and § 1988 for deprivations of Plaintiffs' rights secured by the First and Fourteenth Amendments to the United States Constitution.

7. Jurisdiction is conferred upon this Court by 28 U.S.C. §§ 1343(a)(3) and 1343(a)(4), which provide for original jurisdiction in this Court of all suits brought pursuant to 42 U.S.C. § 1983. Jurisdiction is also conferred on this Court by 28 U.S.C. § 1331 because the cause of action arises under the Constitution and laws of the United States.

8. This Court has authority to award the requested declaratory relief pursuant to 28 U.S.C. § 2201-02; the requested injunctive relief pursuant to 28 U.S.C. § 1343 and Fed R. Civ. P. 65; and costs and attorneys' fees under 42 U.S.C. § 1988.

9. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) because the Defendants reside in this district and all of the acts described in this Complaint occurred in this district.

PLAINTIFFS

10. Plaintiff, C2L is an unincorporated, Christian, student organization at SSU, in Savannah, Georgia. It is the local chapter of the umbrella organization, Commissioned II Love

Outreach Ministries, Inc., ("Outreach Ministries"). C2L has been recognized by SSU as a student organization since it was founded there in October of 2003.

11. Plaintiff, Larinda Norwood is a student at SSU, founder and President of C2L as well as a member.

12. Plaintiff, Satin Kinsey-Hicks is a student at SSU, Vice President of C2L as well as a member.

DEFENDANTS

13. Defendant Julius S. Scott, Jr., the interim President of SSU, a public university organized and existing under the laws of the State of Georgia, is responsible for overseeing campus and administration including its policies and procedures, and is sued in his official capacity.

14. Defendant Carlton E. Brown, the former President of SSU, was responsible for overseeing campus administration including its policies and procedures, and is sued in his individual capacity.

15. Defendant Randy Gunter is the Vice President for Student Affairs at SSU, is responsible for all functions and matters relating to student affairs and services including the policies and procedures for student organizations, oversees and supervises Assistant Vice President for Student Affairs, Irvin Clark, and is sued in both his official and individual capacities.

16. Defendant Irvin Clark is the Assistant Vice President for Student Affairs at SSU, is responsible for assisting Mr. Gunter in all functions and matters relating to student affairs and services including the policies and procedures for student organizations, and is sued in both his official and individual capacities.

17. Defendant Gary Oliver is the Director for Student Programs & Organizations at SSU. Upon information and belief, Mr. Oliver is responsible for all functions and matters relating to student organizations including the implementation of the policies and procedures that govern student organizations, as well as their recognition as SSU student organizations. Mr. Oliver is sued in both his official and individual capacities.

18. Defendant Marilyn Suggs is a faculty member at SSU. On information and belief, Ms. Suggs periodically serves as a hearing officer for administrative hearings conducted by SSU. Ms. Suggs is sued in both her official and individual capacities.

FACTUAL BACKGROUND

A. C2L Mission and History

19. C2L was founded at SSU by Plaintiff Norwood and was officially recognized by SSU's Office of Student Programs & Organizations as an approved student organization in October 2003. See Constitution and Bylaws of Commissioned II Love attached hereto as Exhibit A.

20. As an officially recognized student organization, C2L enjoyed in the past the rights, benefits and privileges that such organizations are given, which include, but are not limited to:

- Facilities for meeting and events
- Promotional and advertising rights and space
- Right to promote and advertise student activities over SSU television channel
- Reservation of meeting space on campus

- Reservations for use of University equipment including cameras, microphones, speakers, lighting, and other audiovisual equipment, as set up and operating services from the University for such equipment
- Opportunity to set up informational/recruitment booths in the Student Center, at Felix Circle, and other places on campus with SSU permission.
- Right to attend weekly Student Government informational meetings for Student Organizations

21. C2L is an evangelical Christian organization. Accordingly, C2L members sincerely believe that the Bible is the inspired word of God, that Jesus Christ is God's Son, that Jesus died and rose from the dead to save mankind, and that Jesus' teachings must be followed in order to live a pure life.

22. Based on their sincerely held religious beliefs, C2L and its members profess that God has called them to share the good news of the death and resurrection of Jesus Christ with all those around them. Moreover, C2L members believe that they must go beyond merely sharing this message by living and modeling a life of purity as revealed in the Bible.

23. Pursuant to these sincerely held religious beliefs, C2L exists for four purposes:

(1) To advance, encourage, strengthen, and uplift the Kingdom of God through the Spirit of Love; (2) To provide a base of unity for other Christians through the promotion of fellowship; (3) To promote the process of purity by the renewing of our minds and lifestyles; and (4) To minister and to reach out to the campus and community by being role models through our lifestyles.

See Exhibit A.

24. C2L's purposes are further embodied in its colors, which are navy blue, powder blue, silver, and white. Navy blue symbolizes God's authority. Powder blue reminds C2L members to look to the heavens. Silver represents the process of purity and White denotes

purity, light and faith. In addition to these colors, C2L clothing contains various religious symbols including a cross, a royal crown, a Bible verse, and/or a person kneeling in prayer.

25. In accordance with its purposes, C2L has adopted the following mission statement: "To advance, encourage, and uplift the kingdom of God through love by ministering and reaching out to the student body and beyond. We will help lead others to Christ by being role models through our lifestyle."

26. C2L advances this mission through a variety of activities including, but not limited to the following: Bible studies, evangelistic outreaches, accountability groups, fellowship retreats, prayer gatherings, and the "Process of Purity."

27. To minister to those students who want to give their lives to God and to join the organization, C2L offers "Process of Purity" classes for one month each semester. These classes are open to the entire student body.

28. The Process of Purity consists of weekly Bible studies taught by outside ministers and C2L leaders on various topics including salvation, prayer, praise, worship, spiritual warfare, and the family of Christ. The goal of the Process of Purity is to teach students the basics of the Christian faith so that they would mature in their relationship with God and become equipped to minister to other students on campus.

29. A student who has completed the Process of Purity is eligible to become a member of C2L if (1) he accepts Jesus Christ as Lord and Savior, and (2) after extensive prayer, both he and the C2L leadership sense that God is calling him to join C2L.

30. Every semester, C2L holds a retreat weekend to celebrate new members. This event is traditionally held at a beach where the current and new C2L members enjoy a time of fellowship, prayer, worship, and performance of other religious practices.

31. During the retreat, it is customary for the current members of C2L to wash the feet of the new members as a sincerely held religious belief and practice. C2L and its members believe that this act is symbolic of Jesus Christ's washing of the apostles' feet as recounted in John 13:1-17, and further, that it serves as a symbol of purity, a charge to share the gospel, and an act of service to others. However, footwashing is not a condition of gaining membership, status, or acceptance into C2L or holding an office. The new members are also given new spiritual names from the scriptures and are commissioned to share the love of Jesus Christ with others.

32. On or about December 10, 2005, C2L held its retreat weekend at Tybee Island following the completion of the 2005 Fall Semester of the Process of Purity.

33. During the weekend, C2L members went swimming in the Atlantic Ocean. Later in the evening, current C2L members washed the feet of the new members, in accordance with their sincerely held religious beliefs.

34. Mr. Xavier Coombs, a student at SSU, voluntarily and willingly participated in both the swimming and foot washing. Specifically, Mr. Coombs had his feet washed at the Spring 2005 retreat and washed the feet of new members at the Fall 2005 Retreat.

B. Conflict Over C2L's Religious Message And Practices

35. In accordance with its mission statement, purposes, and sincerely held religious beliefs, C2L members actively minister on campus and seek opportunities to convert students to Christianity and challenge other Christian students to live a life of purity. Such outreach efforts include one-on-one discussions with fellow students as well as group presentations.

36. One of C2L's primary group outreach tools has been its "Biblical Perspectives" series. These presentations address current topics for college students such as sexuality, drug use, and fraternity/sorority life from a biblical point of view.

37. C2L's best known outreach is its "Biblical Perspectives on Greekdom" ("BPOG"), which it holds in the fall and spring of each year. At BPOG presentations, guest speakers compare Greek culture with the principles and teachings in the Bible. The BPOG guest speakers teach that Greek letter organizations contravene Christian principles because they were founded on occultic traditions, and generally encourage excessive drinking and premarital sexual activity. Further, the guest speakers encourage students either not to join Greek letter organizations or to deactivate their membership if they are already members in such organizations. In the past, each BPOG event drew nearly a hundred students.

38. Certain SSU students, who have disagreed with C2L's outreach efforts, have actively moved to silence the organization and its members by requesting SSU to use its official power to suspend and expel C2L from campus and ban members from practicing their sincerely held religious beliefs.

39. On or about March 2006, Mr. Desi Campbell, a student of SSU and a member of the Alpha Phi Alpha fraternity, a Greek letter organization, began circulating a petition with the following heading:

This is a petition to either get C2L to stop harassing people or to be put off campus. Please sign if this group has either offended you in any way or you feel that they are taking the role of Christianity and the idea of real ministry out of context. They have now moved from ministry to badgering. Please help stop this cult like mentality.

40. On information and belief, Mr. Campbell was employed by SSU to serve as an assistant in the computer lab at SSU. In an effort to get more signatures on the Petition, Mr.

Campbell regularly placed the Petition right next to the sign up sheet at the entrance of the computer lab.

41. Allegedly, approximately 150 students signed the Petition.

42. At around the same time, on information and belief, Mr. Campbell and Mr. Coombs also started a movement on Facebook.com to remove C2L from campus. Previously, Mr. Coombs had left C2L because of disagreements with the organization.

43. Facebook.com is a social utility made up of many networks that allows registrants to share information with one another on the internet. Only persons who are registered members of the same network may communicate with one another. SSU has a Facebook.com network whereby members of the University community can communicate with one another.

44. On information and belief, Mr. Coombs and Mr. Campbell created a Facebook.com profile on the SSU network entitled, "Ban the So Called Saints" that was made up of at least twelve other SSU students. On this profile, Mr. Campbell and Mr. Coombs posted the Petition and encouraged students to help them ban C2L from campus. The profile was quickly removed from Facebook.com once C2L members discovered it.

45. On or about the middle of March 2006, C2L began advertising its Spring Semester production of BPOG by posting flyers around campus and by running a promotional on SSU's Television channel. C2L reserved the Auditorium in the Student Union for the event and planned on using the sound equipment that accompanied the auditorium. The event was scheduled to take place on April 21-22, 2006.

46. On or about April 6, 2006, Mr. Campbell filed a complaint with the SSU Police Department alleging that C2L members engaged in "practices that are not unlike [that] of a cult" such as "bapti[sms]" and "foot washing." Mr. Coombs, who served as a witness to the

complaint, alleged that C2L called him names and told him that “he needs to be saved.” See 4/6/06 Incident Report attached hereto as Exhibit B.

47. Both Mr. Coombs and Mr. Campbell told the Police that “anyone who has different views from [C2L] is ostracized.” Mr. Campbell stated to the Police that he had a Petition with over 150 signatures of persons who “dislike” C2L. See 4/6/06 Incident Report attached hereto as Exhibit B. On information and belief, Mr. Campbell submitted the Petition to the Police along with the complaint.

C. Immediate Suspension

48. On April 10, 2006, four days after the Police report was filed, Defendant Clark issued a “Preliminary Conference Summons” (“Summons”) to Ms. Norwood, via hand delivery, ordering her to attend a preliminary conference the next day at 10:00 a.m. The conference was later rescheduled.

49. The Summons charged C2L with Level I.1 Zero Tolerance Misconduct (Assault, Harassment & Fighting) and Level I.2 Zero Tolerance Misconduct (Hazing) under the SSU Code of Student Ethics. See Summons attached hereto as Exhibit C.

The Student Code of Ethics states in relevant part:

Level I: “Zero Tolerance Misconduct”

Level I offenses are very serious violations of the Code of Student Ethics. The University takes a zero tolerance approach to students who violate these standards. Violating the standards of conduct in this area, as a first offense, will result in a sanction of either suspension or permanent expulsion from the University:

1. Assault, Harassment, and Fighting:

Students are subject to disciplinary action for harassing, threatening, . . . intimidating, coercing, or using physical force in a manner which causes another person of the University community . . . to be reasonably apprehensive or which endangers the health or safety of oneself or another person. Harassing, assaulting, stalking, intimidating, threatening, or abusing another person by written, electronic, pictorial or oral communication or suggestions is prohibited.

2. Hazing:

Students are subject to disciplinary action for engaging in hazing as defined by State of Georgia law. According to the Georgia Law Enforcement Handbook, particularly 16-5-61 . . . :

‘It shall be unlawful for any person to haze any student in connection with or as a condition or precondition of gaining acceptance, membership, office or other status in a school organization. Any person who violates this Code section shall be guilty of a misdemeanor of a high and aggravated nature. . . .’

‘Haze’ means to subject a student to an activity which endangers or is likely to endanger the physical health of a student, regardless of a student’s willingness to participate in such activity.

See Code of Student Ethics, P. 43 attached hereto as Exhibit D.

50. Level I offenses are the most serious offenses that can be charged against an SSU student under the Code of Student Ethics.

51. The Summons further stated that:

ALL ACTIVITIES by Commission 2 Love are **TEMPORARILY SUSPENDED** until such time the preliminary hearing is completed and all investigative and adjudicatory processes are fully adjudicated; sanctions rendered; and the appeal processes exhausted as prescribed in the 2005-2006 Student Handbook.

See Exhibit C.

52. Finally, the Summons forbade C2L members from contacting Mr. Campbell or Mr. Coombs. See Exhibit C.

53. A “suspension” constitutes the second highest sanction available under the SSU Code of Student Ethics. The Code of Student Ethics defines a Suspension in the following manner:

Separation from the University for a stated period of time, with conditions of readmission stated in the notice of suspension. Students who are suspended from the University shall be denied access to the institution, including its facilities,

grounds, residence halls, activities, or privileges for which the student might otherwise be eligible.

See P. 54, Exhibit D.

54. The Code of Student Ethics only allows a student to be subject to sanctions “[u]pon a determination that a student has violated the Code of Student Ethics” See P. 53, Exhibit D. Furthermore, the Code of Student Ethics states that “[s]tudents will be presumed not responsible until proven otherwise by a preponderance of evidence.” See P. 52, Exhibit D.

55. Defendant Clark ignored these requirements and immediately punished C2L with the second most severe sanction available without a prior determination that C2L had committed any violations. Moreover, Defendant Clark imposed these sanctions against the entire C2L organization and its members even though the charges expressly apply only to individual “students” and not “student organizations.”

56. On information and belief, Defendant Clark took these actions against C2L with the knowledge and/or approval of Defendants Brown, Gunter, and Oliver.

57. Through the suspension, Defendants completely denied C2L access to SSU, and suspended its rights, benefits and privileges as a student organization. Accordingly, Defendants closed all channels of communication through which C2L or its members might fulfill its mission, recruit new members on campus, and further its purposes.

58. As a result of the suspension, C2L was forced to hold its BPOG off campus at a local church. Thus, C2L was not able to fulfill its mission and purposes with regard to its intended audience of SSU students as it had done so in the past.

D. Denial of Prayer and Assembly

59. On or about April 20, 2006, approximately fifteen C2L members, including Plaintiff Kinsey-Hicks, gathered to walk and pray together on campus. Defendant Gunter

instructed the SSU Police to stop C2L from assembling and praying together. SSU Police Officers Lucious Simmons and Ebony Glover confronted the group and ordered them to stop praying and assembling because of their affiliation with C2L. See 4/20/06 Supplemental Incident Report attached hereto as Exhibit E.

60. On information and belief, Defendant Gunter took this action against C2L with the knowledge and/or approval of Defendants Brown, Clark, and Oliver.

E. Interim Suspension

61. On or about April 25, 2006 Defendant Suggs presided over the hearing in the matter of Savannah State University v. Commissioned II Love. However, Defendant Clark actively intruded into the hearing process with the consent of Defendant Suggs and unduly influenced the hearing process by, among other things, usurping the hearing officer's role, framing issues to be addressed and those that would not be addressed, and interjecting his own view of the facts.

62. On or about May 1, 2006, Defendant Suggs issued her final report and distributed it to Defendants Brown, Gunter, and Clark. In her report, Defendant Suggs based her final decision on the following:

- (1) An incident where a "verbal altercation" occurred between Ms. Norwood and Mr. Campbell;
- (2) the signed Petition circulated by Mr. Campbell;
- (3) the phone call between Ms. Green and Mr. Coombs' parents;
- (4) an incident where Ms. Norwood told Mr. Coombs to, "Shut [his] mouth";
- (5) Mr. Coombs' act of washing the feet of another C2L member; and
- (6) Mr. Coombs' act of jumping into the Atlantic Ocean.

See Final Report attached hereto as Exhibit F.

63. Based on this information, Defendant Suggs made the following findings in her final report:

- (1) “cause of concern” that C2L’s contact with Mr. Campbell and Mr. Coombs caused them to be “reasonably apprehensive”;
- (2) “cause of concern” with the process voluntarily submitted to by Mr. Coombs—the footwashing and jumping in the ocean—as part of his membership in C2L; and
- (3) “cause of concern” with C2L’s leadership and its affiliation with an overseeing, outside minister.

See Exhibit F.

64. Based on these findings, Defendant Suggs imposed sanctions on C2L including suspension through January 2007, community service, and probation. Furthermore, under the suspension, C2L was prohibited from the following:

- (1) conducting any activities;
- (2) congregating;
- (3) wearing its paraphernalia;
- (4) soliciting membership; or
- (5) participating in “meetings, step shows, or other ‘underground activities’ on campus or off campus”

See Exhibit F.

65. Moreover, Defendant Suggs’ sanctions required C2L to amend its Constitution to “demonstrate[e] [its] commitment to University policies and procedures,” even though said Constitution was never found to be in violation of any SSU policies and/or procedures. See Exhibit F.

66. On information and belief, Defendants Brown, Gunter, Clark and Oliver had knowledge of and/or approved the final report and the sanctions imposed on C2L.

67. Through these sanctions, Defendants went far beyond simply removing C2L’s ability to function as a recognized student organization on campus. Effectively, these sanctions cut off C2L’s and its members’ ability to practice their beliefs, such as prayer, footwashing, assembly, converting new members, fulfilling its mission and purposes, and responding to students who did not agree with C2L and its members’ beliefs and practices.

F. Expulsion

68. On May 8, 2006, C2L appealed the decision of Defendant Suggs to Defendant Gunter.

69. On or about September 8, 2006, members of C2L as well as non-members took a weekend trip to Orlando, Florida to partake in Walt Disney's Night of Joy contemporary Christian music event at which prayer, worship, and singing of religious music were going to take place.

70. On the day the group was scheduled to depart, Defendant Clark contacted Ms. Norwood by phone and instructed her to immediately cancel the trip because of the suspension. Ms. Norwood informed Defendant Clark she would not cancel the trip because it was an off-campus event not affiliated with the C2L student chapter and was thus not subject to the suspension.

71. On or about September 11, 2006, Defendant Clark issued an "Organization Expulsion Notification" ("Expulsion") to C2L, via hand delivery, which immediately expelled and deactivated C2L permanently from SSU on the grounds that it had violated the terms of its suspension. See Expulsion attached hereto as Exhibit G.

72. Expulsion is the most severe sanction available in the Student Code of Ethics. The Code of Student Ethics defines expulsion in the following manner:

Permanent Separation from the University. Students who are expelled from the University shall be denied access to the institution, including its facilities, grounds, residence halls, activities, or privileges for which the student might otherwise be eligible.

See P. 54, Exhibit D.

73. On information and belief, Defendants Brown, Gunter, and Oliver knew of and/or approved this sanction imposed on C2L.

74. On September 15, 2006, C2L appealed both the expulsion and the underlying suspension to Defendant Gunter on the grounds that the actions taken against C2L and its members violated its members' civil and constitutional rights, there was a failure to follow procedure, the findings were not supported by substantial evidence, there was demonstrated bias against C2L, and that the sanctions imposed were excessive.

75. On September 28, 2006 Defendant Gunter scheduled an appeal hearing and held the appeal hearing on that same day in the absence of C2L.

76. Ms. Norwood heard about the appeal hearing for the first time from C2L's faculty advisor on September 28, 2006.

77. Defendant Gunter denied all of C2L's grounds for appeal and affirmed the suspension and expulsion in all respects. Defendant Gunter did not address C2L's allegations that its constitutional rights had been violated.

78. On information and belief, Defendants Brown, Clark and Oliver knew of and/or approved the decision issued by Defendant Gunter.

79. On October 9, 2006, C2L appealed Defendant Gunter's decision to Defendant Brown and reiterated its previous grounds for appeal.

80. On or about October 30, 2006, Defendant Brown held a hearing on C2L's appeal.

81. On December 18, 2006, Defendant Brown issued a decision affirming in all respects the expulsion and deactivation of C2L. Said decision became the official policy of SSU.

82. Effective January 1, 2007, Defendant Scott, became the new Interim President of SSU. As President, he is in charge of administering and enforcing SSU policy, including but not limited to the official policy suspending, expelling and deactivating C2L.

ALLEGATIONS OF LAW

83. Defendants have violated the constitutional rights of the Plaintiffs by punishing C2L and its members for footwashing, praying and assembling, ministering to other students, speaking out in response to students who disagree with their message, worshipping and assembling, and have effectively prohibited and/or chilled these actions along with the suspension and expulsion of C2L as a recognized SSU student organization denying it and its members all the rights, benefits, and privileges of such status and extinguishing its ability to associate, fulfill its mission and purpose, or wear its religious symbols.

84. These intentional and knowing actions of the Defendants are illegal under the Free Exercise Clause of the First Amendment. The right to the Free Exercise of Religion is clearly established by governing legal authority, and Defendants' violations are knowing, intentional and without justification. So long as these actions continue to go unpunished, the Defendants are causing ongoing and irreparable harm to Plaintiffs.

85. These intentional and knowing actions of the Defendants are illegal under the Free Speech Clause of the First Amendment. The right to the Freedom of Speech is clearly established by governing legal authority, and Defendants' violations are knowing, intentional, and without justification. So long as these actions continue to go unpunished, the Defendants are causing ongoing and irreparable harm to Plaintiffs.

86. These intentional and knowing actions of the Defendants are illegal under the Assembly Clause of the First Amendment. The right to Peaceable Assemble and the rights to expressive and intimate association are clearly established by governing legal authority, and Defendants' violations are knowing, intentional and without justification. So long as these actions continue to go unpunished, the Defendants are causing ongoing and irreparable harm to Plaintiffs.

87. All of the alleged acts of Defendants , Scott, Brown, Gunter, Clark, Oliver, and Suggs, including their officers, agents, servants, employees or persons acting at their behest or direction were done and are continuing to be done under color of state law and pursuant to policies and/or customs established by SSU through Defendants.

88. Unless and until Defendants' actions are enjoined, C2L and its members will suffer and continue to suffer irreparable harm to their rights of free exercise of religion, free speech, and free association.

FIRST CAUSE OF ACTION

Violation of Plaintiffs' First Amendment Right to Free Exercise of Religion

89. Plaintiffs repeat and reallege each of the foregoing allegations in this complaint.

90. By punishing C2L and its members for footwashing, ministering to students, worshipping and assembly, by suspending C2L and permanently expelling and deactivating C2L from SSU, as well as prohibiting such practices by C2L and its members, Defendants by policy and practice have prohibited and denied Plaintiffs of their right to free exercise of religion.

91. Defendants, acting under color of state law, and according to policy and practice, have explicitly and implicitly discriminated on the basis of religion and prohibited and deprived Plaintiffs of their clearly established right to free exercise of religion secured by the First Amendment to the United States Constitution.

92. Because of Defendants' actions, Plaintiffs have suffered, and continue to suffer, irreparable harm. Plaintiffs are therefore entitled to equitable relief.

93. Pursuant to 42 U.S.C. §§ 1983 and 1988, Plaintiffs are entitled to a permanent injunction and the reasonable costs of this lawsuit, including their reasonable attorneys' fees.

SECOND CAUSE OF ACTION

Violation of Plaintiffs' First Amendment Right to the Freedom of Speech

94. Plaintiffs repeat and reallege each of the foregoing allegations in this complaint.

95. By punishing C2L and its members for ministering to students, worshipping and assembling and speaking out in response to students who disagree with them, by suspending C2L, and permanently expelling and deactivating C2L from SSU, as well as prohibiting such activities, Defendants by policy and practice have abridged and denied Plaintiffs of their right to free speech at SSU.

96. Defendants, acting under color of state law, and according to policy and practice, have explicitly and implicitly discriminated on the basis of content and viewpoint and abridged and deprived Plaintiffs of their clearly established right to the freedom of speech secured by the First Amendment to the United States Constitution.

97. Because of Defendants' actions, Plaintiffs have suffered, and continue to suffer, irreparable harm. Plaintiffs are therefore entitled to equitable relief.

98. Pursuant to 42 U.S.C. §§ 1983 and 1988, Plaintiffs are entitled to a permanent injunction and the reasonable costs of this lawsuit, including their reasonable attorneys' fees.

THIRD CAUSE OF ACTION

Violation of Plaintiffs' First Amendment Right to Peaceably Assemble, Intimate Association and Expressive Association

99. Plaintiffs repeat and reallege each of the foregoing allegations in this complaint.

100. By punishing C2L and its members for footwashing, ministering to students, worshipping and assembling, by suspending C2L and permanently expelling and deactivating C2L from SSU, as well as prohibiting such practices, Defendants by policy and practice have denied Plaintiffs of their right to peaceably assemble, and intimate and expressive association.

101. Defendants, acting under color of state law, and according to policy and practice, have expressly and implicitly prohibited, abridged and denied Plaintiffs from assembling and associating intimately and expressively, depriving Plaintiffs of their clearly established right to free assembly and association secured by the First Amendment to the United States Constitution.

102. Because of Defendants' actions, Plaintiffs have suffered, and continue to suffer, irreparable harm. Plaintiffs are therefore entitled to equitable relief.

103. Pursuant to 42 U.S.C. §§ 1983 and 1988, Plaintiffs are entitled to a permanent injunction and the reasonable costs of this lawsuit, including their reasonable attorneys' fees.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court order the following relief:

- (1) A declaration that Defendants' actions and sanctions, including punishing and prohibiting footwashing, prayer and assembly, worship and assembly, speaking out against students who disagree with C2L, suspension, expulsion, and termination of C2L as a student organization and its attendant rights, privileges, benefits, and incidents, is unconstitutional as applied against Plaintiffs;
- (2) A preliminary and permanent injunction enjoining Defendants from denying to C2L recognized student organizational status at SSU; enforcing its sanctions against Plaintiffs, C2L or its members; and prohibiting Defendants, their employees officers and agents, and all persons acting by and through them, from withholding the rights, privileges, benefits, or incidents of recognized student organizational status from C2L and from retaliating against Plaintiffs or other C2L members directly or indirectly for exercising their constitutional rights;
- (3) An award of nominal damages;

- (4) An award of reasonable costs and attorneys' fees incurred by Plaintiffs in prosecuting this action pursuant to 42 U.S.C. § 1988;
- (5) That this Court retain jurisdiction over this case for the purposes of enforcement of any order; and
- (6) Such other and further relief as the Court deems proper and just under the circumstances.

Respectfully submitted, this 1st, day of March 2007



L. TAYLOR HANSON
State Bar No. 001693
Georgia State Bar NO.
MARK D. JOHNSON
State Bar No. 395041

JOSEPH J. MARTINS*
North Carolina Bar No. 31666
BARRY C. HODGE*
Virginia Bar No. 34886
National Legal Foundation
2224 Virginia Beach Blvd., Suite 204
Virginia Beach, VA 23454
(757) 463-6133
(757) 463-6055 - facsimile
LEAD COUNSEL

DAVID A. FRENCH*
Tennessee Bar No. 16692
Kentucky Bar No. 86986
Alliance Defense Fund
7141 Old Zion Road
Columbia, TN 38401
(931) 490-0591
(931) 490-7989 - facsimile

BENJAMIN BULL (of counsel)*
Alliance Defense Fund
15333 N. Pima Rd., Suite 165
Scottsdale, AZ 85260
(480) 444-0020
(480) 444-0028 - facsimile

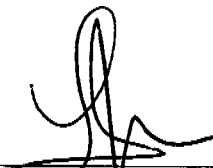
(*Pro Hac Vice Motion concurrently filed)

ATTORNEYS FOR PLAINTIFFS

VERIFICATION OF COMPLAINT

I, Larinda Norwood, a citizen of the United States and resident of the State of Georgia, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that I have read the foregoing Verified Complaint and the factual allegations therein, and the facts as alleged are true and correct.

Executed this 12 of February, 2007



Larinda Norwood

Sworn to and subscribed before me:

Sue S. Schmidt

Notary Public, Chatham County Ga

My Commission Expires Nov. 2, 2008

I, Satin Kinsey-Hicks, a citizen of the United States and resident of the State of Georgia, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that I have read the foregoing Verified Complaint and the factual allegations therein, and the facts as alleged are true and correct.

Executed this 12 of February, 2007



Satin Kinsey-Hicks

Sworn to and subscribed before me:

Sue S. Schmidt

Notary Public, Chatham County, Ga

My Commission Expires: Nov. 2, 2008

Exhibit A

Constitution and By-Laws

Of the

Commissioned II Love

Preamble

We, the members of the Commissioned II Love, a Christian Discipleship of Savannah State University, do hereby constitute ourselves an organization subject to the following provisions.

Mission Statement

To advance, encourage, strengthen, and uplift the kingdom of God through love by ministering and reaching out to the student body and beyond. We will help lead other to Christ by being role models through our lifestyles.

Articles I

Name

The name of this organization shall be the Savannah University Chapter of Commissioned II Love. All official documents shall bear this name.

Colors

The colors shall be navy blue, powder blue, silver, and white. **NAVY BLUE** is symbolic to God for authority. **Powder Blue** means that we should look to the heavens. **Silver** is the process of purity and **White** represents purity, light, and faith.

Article II

Purpose

- Section I** To advance, encourage, strengthen, and uplift the Kingdom of God through the Spirit of Love
- Section II** To provide a base of unity for other Christians through the promotion of fellowship
- Section III** To promote the process of purity by the renewing of our minds and lifestyles
- Section IV** To minister and to reach out to the campus and community by being role models through our lifestyles

Article III

Membership

This organization will not deny membership to any person, who accepts and understands the organization's purpose, on the basis of race, religion, gender, disability, age, marital status, veteran status, ethnicity, national origin, language, or creed.

- Section I** **General Members** Any person who is going through the process of purity are considered general members that have no voting rights. They must fulfill the requirements of the group before they can become voting members.
- Section II** **Voting Members** Any person who has been through the process of purity and has been accepted into this elite group who God has commissioned to lead.
- Section III** **Office Holding Members** Any voting member in good and regular standing is able to hold office.
- Section IV** **Dues** \$40.00 per semester
- Section V** **Other Campus Ministries** All members are encouraged to take an active part in other campus ministries.

Article IV

Meeting

- A. Commissioned II Love will meet twice monthly during fall and spring semesters. Time and place of meetings shall be determined by the Executive Board.**
- B. The executive Board with the Approval of the President shall call special meetings allowing 24-hour period of advance notice.**
- C. Quorum shall consist of 2/3 of the voting membership. Quorum may pass an issue with simple majority vote (67%).**
- D. Robert's Rules of Order shall govern all meetings.**
- E. This is the Standard Meeting Agenda**
 - I. Praise & Worship**
 - II. Greetings**
 - III. Roll Call**
 - IV. Reading of Minutes**
 - V. Business Session**
 - VI. Announcements**
 - VII. Adjournment**

Article V

Administration

Section I Only officially registered students with a minimum 2.5 GPA shall be eligible to serve as elected or appointed officers of Commissioned II Love.

Section II Duties of Executive Board Officers

A. President

Shall provide at all Executive Board meetings and general meetings, and shall be Ex-officio member of all committees as many be necessary to the conduct and development of the organization. The president, in consultation with the Advisor, will appoint chairpersons of all committees.

The President can also appoint officers for any position that is not filled. Any officer not performing their duties by attending meetings and other duties that may be assigned to them by the President and/or Advisor will be notified twice, and the third time will automatically be removed from office.

The President shall also appoint two administrative assistants of the young men the young women to carry out duties assigned to them.

The President Office is the only office that is not elected. The President is recommended by the membership and is appointed by the Executive Board & Founding Members.

B. Vice President

Shall serve in the absence of the President and as chairperson of the Constitution and by-Laws Committee. The vice-President shall also serve as Coordinator of the Standing Committees.

C. Recording Secretary

Shall keep accurate records of the organization under the direction of the President, and perform all other duties common to such office. In addition, Secretary will conduct a census each semester and shall keep as accurate enrollment of the Commissioned II Love membership.

D. Assistant Recording Secretary

Shall assist the Recording Secretary in keeping all records, and in the absence of the Recording Secretary shall perform their duties. Assistant shall assist the Financial Secretary.

E. Financial Secretary

Shall keep an accurate record of all monies recorded and disbursed. The secretary shall be responsible for making all bank deposits and is responsible for holding the checkbook. The secretary shall suggest financial resources and help plan projects to raise the finances.

F. Public Relations Coordinator

Shall be responsible for corresponding with the members of the organization about any upcoming events. The coordinator shall make sure all announcements are up in a timely fashion. The coordinator shall serve as the organization's Chief Spokesperson. The coordinator shall also work closely with the secretarial team with all documents.

G. Worship Leader

Shall serve Commissioned II Love whenever called upon by providing appropriate worship services and shall provide resources and materials. Worship Leader shall assist the Activity Coordinator.

H. Activity Coordinator

Shall have the responsibility of planning and implementing the total program of events sponsored by Commissioned II Love.

I. Historian

Shall have the responsibility of keeping all records of the activities and events of Commissioned II Love. Historian shall also have the responsibility of gathering the data pertaining to the history of Commissioned II Love.

Section III **Attendance** executive Board Members are required to attend all regularly scheduled meetings. If an officer missed meetings, they will be notified twice by the President and Advisor. If a third violation occurs. They will automatically be removed.

Section IV **Removal of Executive Board Members** Any officer can be removed by a two-thirds (2/3) majority vote of the voting membership of Commissioned II Love at anytime with provable evidence.

Article VI

Officers

Section I **Nomination** All nominations must be submitted to the executive Board within 10 days at the beginning of the Spring Semester.

Section II **Election** The time of the election of officers shall be determined by the Executive board, and well published by the Public Relations Coordinator. Elections will be held by secret ballot if needed.

Section III Newly elected officers shall take office at the beginning of the Fall semester.

Article VII

Finances

Section I

The Financial Secretary will be responsible for the collection disbursement of funds. The President, Advisor, and Financial Secretary will authorize major expenditures. Expenditures more than \$200.00 will be authorized by majority vote. All expenditures **MUST** have the signatures of person requesting, the President (or appointee), the Advisor, and the Financial Secretary.

Article VIII

Advisors

Section I

- A. The Advisor shall be a full-time faculty or staff member of Savannah State University.
- B. The advisors can be recommended for removal from the petition by the Commissioned II Love Executive Board.
 1. If they are not contributing to the organization in a manner that if fitting and right.
 2. Any reason not mentioned but deemed appropriate by the Executive Board.
 3. Must be removed by a two-thirds (2/3) majority vote of the voting membership of Commissioned II Love at anytime with provable evidence.

Article IX

Standing Committees

In order to implement the program and project of Commissioned II Love, the Standing Committees are as follows:

- A. Intercessory
- B. Wardrobe
- C. Parade
- D. Activity
- E. Fundraiser
- F. Process of Purity
- G. Ceremony of Purity

Article X

Duties of Committees

- Section I** **Intercessory** To keep the ministry covers and uplifted in prayer as well as the leaders, remnants, and those who will be affected by the ministry directly and indirectly.
- Section II** **Wardrobe** To provide the ministry with uniforms, suits, and/or accessories. The clothing will reflect the excellence and the victory we are living in.
- Section III** **Parade** The new remnant platoon are automatically a part of this committee. They have to design and construct a parade float for the homecoming parade for Miss Commissioned II Love to sit upon.
- Section IV** **Activity** To develop different activities that would promote Christian living and proclaim Christ.
- Section V** **Fundraiser** To raise adequate funds for the ministry
- Section VI** **Ceremony of Purity** To plan, organize, and direct the ceremony for the new remnant platoon.

Article XI

Amendments

Any member of the organization can sponsor any amendment. The amendment must be submitted to the Vice President with 60 days at the beginning of the fall or spring semester. The amendment must be approved by a two-thirds(2/3) majority vote of the whole body.

Leadership

Larinda Norwood, President/ Commanding Officer Passion

Satin Kinsey Hick, Vice President

Amber Allen, Commanding Officer of "Women of Destiny"

Christopher King, Commanding Officer of "Men of Standard"

Shawon McCoy, Commanding Officer Breaking Force

Consuela Johnson, Administrative Assistant

Lajasha Williams, Recording Secretary

Shawon McCoy, Assistant Recording Secretary

Megan Jones, Financial Secretary

Erica Thomas, Public Relations Coordinator

Tony Zachary, Public Relations Coordinator

Amanda Rouse, Chief Intercessor

Joha Harrison, Historian

Janika Davis, Wardrobe Coordinator

Exhibit B

Apr-07-2006 03:18pm From

Information

1	HIGHWAY	2	SVC STATION
3	CONVENIENCE STORE	4	BANK
5	COMMERCIAL	6	RESIDENCE
<input checked="" type="checkbox"/>	SCHOOL/CAMPUS	8	ALL OTHER

EVENT

INCIDENT LOCATION: SSU campus LOC. CODE: 31404

INCIDENT DATE: 040606 TIME: 1600 STRANGER TO STRANGER: YES NO LINK

WEAPON TYPE: 1 GUN, 2 KNIFE CUTTING TOOL, 3 HANDS/FIST, ETC, 4 OTHER

VICTIM

COMPLAINANT: Desi Campbell ADDRESS: 3109 Fatigant Ave PHONE NUMBER: 596 3938

VICTIM'S NAME: Desi Campbell@hotmail.com RACE: B SEX: M AGE: 39 RESIDENCE PHONE: BUSINESS PHONE:

ADDRESSES: CENSUS TRACT: EMPLOYER OR OCCUPATION:

STUDENT? YES NO IF YES, NAME VICTIM'S SCHOOL:

WANTED

NAME: ADDRESS: CENSUS TRACT: HEIGHT: WEIGHT: HAIR: EYES:

OFFENDER

WARRANT CHARGES: INFORMATION COUNTS: OFFENSE CODE: OFFENSE/ARREST: JURIS.:

ARREST:

TOTAL NUMBER ARRESTED: ARREST AT OR NEAR OFFENSE SCENE: YES NO DATE OF OFFENSE:

1. CITY, 2. COUNTY, 3. STATE, 4. OUT OF STATE, 5. UNKNOWN

VEHICLE

STOLEN: TAG NUMBER: STATE: YEAR: VIN: PLATE ONLY: VIN PLATE ONLY:

RECOVD: YEAR: MAKE: MODEL: STYLE: COLOR:

SUSPECTS: MOTOR SIZE (CID): AUTO: MAN: SPD. INSURED BY:

WITNESS

NAMES: ADDRESS: PHONE NUMBER:

PROPERTY

VEHICLES	CURRENCY, NOTES, ETC.	JEWELRY, PREC. METALS	FURS	PROPERTY RECOVERY INFO ONLY JURISDICTION CODES THEFT/RECOVERY DATE OF THEFT
STOLEN				
RECOVERED				
CLOTHING	OFFICE EQUIP.	TV, RADIO, ETC.	HOUSEHOLD GOODS	
STOLEN				
RECOVERED				
FIREARMS	CONSUMABLE GOODS	LIVESTOCK	OTHER	TOTAL
STOLEN				
RECOVERED				

ADM.

GIC ENTRY WARRANT MISSING PERSONS VEHICLE ARTICLE BOAT GUN SECURITIES

DRUG

DID INVESTIGATION INDICATE THAT THIS INCIDENT WAS DRUG-RELATED? YES NO

IF YES, PLEASE INDICATE THE TYPE OF DRUG(S) USED BY OFFENDER:

1 - AMPHETAMINE 2 - BARBITURATE 3 - COCAINE 4 - HALLUCINOGEN 5 - HEROIN

6 - MARIJUANA 7 - METHAMPHETAMINE 8 - OPIUM 9 - SYNTHETIC NARCOTIC U - UNKNOWN

CLEAR

REQUIRED DATA FIELDS FOR CLEARANCE REPORT: CLEARED BY ARREST EXCEPTIONALLY CLEARED UNFOUNDED

DATE OF CLEARANCE: ADULT JUVENILE

REPORT DATE: 040606

NARRATIVE

ON Thursday April 6, 2006 at approximately 1600 hrs
off. Hayes was dispatched to Duke Safety Office
to investigate complaints from

RECEIVED

REPORTING OFFICER: K. Hayes NUMBER: 312 APPROVING OFFICER: APR - 7 2006 NUMBER:

VICE PRESIDENT OF STUDENT AFFAIRS

Apr-07-2006 03:18pm From-

**SAVANNAH STATE UNIVERSITY POLICE DEPARTMENT
INCIDENT REPORT CONTINUED**

AGENCY I.D. # GA0251000

CRN #: 060406229

ORIGINAL REPORT ()	SUPPLEMENTAL REPORT (✓)	REPORT DATE <u>04/06/06</u>
---------------------	-------------------------	-----------------------------

NARRATIVE

On Thursday April 6, 2006 at approximately 1600 hrs Ofc Hayes was dispatched to Public Safety office to investigate some concerns of students Desi Campbell, the complainant advised this officer of concerns he had with the group called Commissioned to Love. Campbell stated that members of the group have been harassing him along with other students. Campbell, the complainant also stated that members of the group has similar practices that are not unlike of a cult. Campbell advised that members are required to be baptized at Tybee Island and foot washing are part of the group customs.

One student who wish to be anonymous stated that she was harass because she was not part of the group and did not have the same views as the group.

Xavier Coombs, witness stated he had similar run ins with the group stemming from name calling to talking him that he needs to be saved.

Both Coombs and Campbell advised that anyone who has different views from the group is ostracize. Campbell stated he had approximately 150 signature of who share

REQUIRED DATA FIELDS: TIME: 2000

SHIFT: 3rd

PAGE 2 OF 3

Chain of Command Notified: Yes No

CLEARED BY ARREST ()	UNFOUNDED ()	EXCEPTIONALLY CLEARED ()
-----------------------	---------------	---------------------------

REPORTING OFFICER: Keith Hayes (312) APPROVED BY: _____

SAVANNAH STATE UNIVERSITY POLICE DEPARTMENT INCIDENT REPORT CONTINUED

AGENCY I.D. # GA0251000

CRN #: 060406229

ORIGINAL REPORT ()	SUPPLEMENTAL REPORT ()	REPORT DATE <u>040606</u>
---------------------	-------------------------	---------------------------

NARRATIVE

the same dislike of the group

REQUIRED DATA FIELDS: TIME: _____ SHIFT: _____

PAGE 3 OF 3

Chain of Command Notified: Yes No

CLEARED BY ARREST ()	UNFOUNDED ()	EXCEPTIONALLY CLEARED ()
-----------------------	---------------	---------------------------

REPORTING OFFICER: Keith Hays, 317 APPROVED BY: _____ ()

Exhibit C



SAVANNAH STATE UNIVERSITY
A UNIT OF THE UNIVERSITY SYSTEM OF GEORGIA
SAVANNAH, GEORGIA 31404

Center for Student Ethics
KING -FRAZIER COMPLEX, RM 225
TELEPHONE: (912) 356-2194

FAX: 912-356-2464

10 April 2006

PRELIMINARY CONFERENCE SUMMONS

Commission 2 Love

Ms. Larinda Norwood, President

(Hand-Delivered)

269 E. DeRenne Avenue
Savannah, Georgia 31405

Dear Ms. Norwood,

The Office of Student Ethics is in receipt of a police report (**CRN#060406229**) from the Savannah State University Police Department that outlines possible violations of the Savannah State University Code of Student Ethics; specifically charging Commission 2 Love with a Level I.1 Zero Tolerance Misconduct (Assault, Harassment & Fighting) and Level I.2 Zero Tolerance Misconduct (Hazing) on 6 April 2006. In keeping with the mission of the University, cases as such are adjudicated through Student Ethics. Consistent with this, you and/or your designee from your executive board have a **preliminary conference** with me on behalf of Commission 2 Love in the Office of Student Affairs, King-Frazier Student Center, Room 247 at **10:00am Tuesday 11 April 2006**.

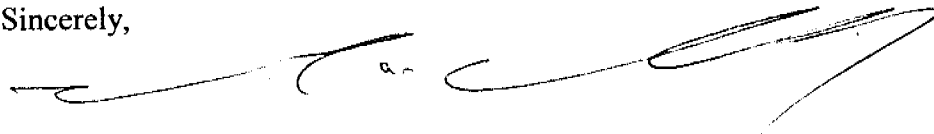
Given the nature of the alleged infractions, **ALL ACTIVITIES** by Commission 2 Love are **TEMPORARILY SUSPENDED** until such time the preliminary hearing is completed and all investigative and adjudicatory processes are fully adjudicated; sanctions rendered; and the appeal processes exhausted as prescribed in the 2005-2006 Student Handbook. Furthermore, **ALL** current members of Commission 2 Love are **MANDATED** to refrain from having any written, **verbal**, electronic, telephonic and/or physical contact with Mr. Xavier Coombs and Mr. Desi Campbell and/or utilize their names in any way that may be viewed as damaging to their character and/or have any contact with any of their property. Any violation of this **MANDATE** while the adjudicatory processes are being rendered and thereafter to refrain from having any written, **verbal**, telephonic and/or physical contact with Mr. Xavier Coombs and Mr. Desi Campbell will be viewed as non-compliance with the original complaint and will result in the organization being immediately suspended and all individual members of Commission 2 being immediately suspended from Savannah State University. We request that you assist us

Subject: Mr. Xavier Coombs / Mr. Desi Campbell
10/10

by encouraging your friends to refrain from agitating this matter on your behalf. Please know that if future incidents occur that suggest your encouragement of friends to agitate, harass and/or provoke Mr. Xavier Coombs and/or Mr. Desi Campbell and/or their friends to continue this matter, Student Affairs will respond as previously stated.

Failure to follow the processes prescribed above and failure to refrain from having contact with Mr. Xavier Coombs and Mr. Desi Campbell until your case is adjudicated through the University adjudicatory processes, can result in further charges being imposed against the organization and individuals with the possible sanctions of suspension and/or expulsion from the University. Finally, failure to be present on the date and time indicated above to discuss these allegations shall result in your case being adjudicated in your absence, with possible sanctions ranging from reprimand to suspension and/or expulsion from the University.

Sincerely,



Irvin Clark, Ed.D.
Assistant Vice President for Student Affairs

Cc: Dr. Randy Gunter, Vice President for Student Affairs
Dr. Kenneth Jordan, Co-Advisor
Ms. Kashanna Bridges, Co-Advisor
Mr. Gary Oliver, Director, Student Programs and Organizations
Mr. Xavier Coombs, Student Complainant
Mr. Desi Campbell, Student Complainant
Student Programs & Organizations File
Student Ethics File

Exhibit D

RIGHTS OF VICTIMS INVOLVED IN ACTS THAT VIOLATE THE CODE OF STUDENT ETHICS

Students who are victims of acts that are in violation of the Code of Student Ethics have the following rights.

1. To submit a written account of the alleged misconduct.
2. To meet with the Vice President for Student Affairs, the Coordinator of Student Ethics, or other administrators involved in the case to discuss the disciplinary process.
3. To be advised of the date, time, and location of the disciplinary hearing, and to request rescheduling for good cause.
4. To testify as a witness during the hearing.
5. To be accompanied by an advisor of the victim's choosing during the hearing process; however, the advisor will not be able to speak on behalf of the victim.
6. To submit a written impact statement to the judicial body for consideration during the sanctioning phase.

STUDENT PUBLICATIONS

Students are free, both individually and collectively, to express their views on institutional matters and on issues that are of interest to the University's student body. The University views student publications, including *The Tiger's Roar*, as media for free and responsible discussion and intellectual discourse. Inasmuch as the University will not purposefully restrict the editorial freedom of student publications and the student press, the editors and/or those responsible for student publications and the student press must be governed by responsible journalism, which entails avoiding libelous and indecent statements, undocumented allegations, attacks on personal integrity, and on employing techniques of harassment and innuendo. To ensure this responsibility, student publications and the student press are encouraged to secure advanced approval of copy by the adviser. Additionally, because student publications and the student press are not official organs of the University, a prominent disclaimer indicating that the views expressed within the publication are not necessarily those of the institution or its faculty, staff, or students must be inserted in the masthead or in some conspicuous section of the publication.

Savannah State University is committed to a cooperative climate in which media representatives of the *Tiger's Roar* student newspaper may obtain information on criminal activity on campus. The Georgia Open Records Act and the Campus Security Act, now officially known as the Clery Act, regulated the release of criminal information. In addition to the University's annual report in accordance with the Clery Act, Savannah State University's standard operation procedure shall require the Director of Communications & Community Relations to receive any requests from the *Tiger's Roar* staff for summary reports and respond within a reasonable time frame.

Savannah State University's standard operation procedure shall require the Department of Public Safety through the Chief of Public Safety to provide the requested information to the Director of Communications & Community Relations within a reasonable time frame for transmission to the *Tiger's Roar* staff in accordance with the applicable state and federal laws as referenced herein.

STUDENT RECORDS

Savannah State University is covered by the Family Educational Rights and Privacy Act of 1974 (FERPA), as amended. It is designed to protect the students' rights with regard to education records maintained by the institution. Under the Act, students may inspect and review their own education records maintained by the institution and challenge the content of records (except grades which can only be challenged through the academic appeal procedure) on the grounds that they are inaccurate, misleading or in violation of privacy or other rights. Students may control disclosures from educational records with certain exceptions. Savannah State University's policy on "Access to Student Records" complies with the provisions of FERPA. For additional information or technical assistance, you may call (202) 260-3887 (voice). Individuals who use TDD may call the Federal Information Relay Service at 1-800-877-8339, or you may contact them at the following address: Family Policy Compliance Office, U. S. Department of Education, and 400 Maryland Avenue, SW Washington, D.C. 20202-4605.

Not Responsible: A student who denies responsibility for the alleged violation will have his or her case heard by the judicial body that has authority to hear the case. A date and time shall be set for a hearing not less than two nor more than seven class days after the student has made his or her "not responsible" declaration.

Drop the Case: The Coordinator of Student Ethics may elect to drop the case should the allegation have no merit or drop the case for lack of sufficient evidence. In these instances, both the complainant and the accused student will be notified of such in writing.

B. Summary Suspension

A student may be summarily suspended from the University and all of its grounds by the Vice President for Student Affairs and without following the hearing procedures articulated in the handbook if the Vice President for Student Affairs is satisfied that the student's continued presence on the campus constitutes a serious threat of harm to the student or to any other person on the campus or to the property of the University or property of other persons on the University campus. Within five business days after being summarily suspended, the student may request a hearing upon which the summary action was based. A student who has been summarily suspended from the University shall be required to leave the University's grounds immediately and shall be notified that he or she could be arrested for trespassing if he or she returns to the University without authorization from the Vice President for Student Affairs.

C. The Implication for Failing to Appear Before a Tribunal

If a student notified to appear before the Coordinator of Student Ethics, the Student Government Judiciary, the Board of Student Ethics, or a Hearing Officer fails without excuse to comply, the accused will be tried in absentia. If substantial evidence is presented establishing that the violation occurred as alleged, the accused student shall be notified and an appropriate sanction will be provided by written notice. When an extension of time appears necessary to avoid undue hardship or injustice, time may be extended to enable a student to respond to an accusation or prepare a defense.

HEARING PROCEDURES

A. Order of the Hearing

In adjudicating formal cases, all tribunals will follow the following order:

- 1) Call to order by the chairperson or Coordinator of Student Ethics;
- 2) Reading of the charge(s) and specification of the alleged incident of misconduct by the chairperson or Coordinator of Student Ethics;
- 3) Presentation of the complainant's case, including presentation of witness, by the Coordinator of Student Ethics;
- 4) Cross examination of witnesses by the accused student;
- 5) Presentation of the accused student's case, including presentation of witnesses;
- 6) Cross examination by the Coordinator of Student Ethics and/or the complainant;
- 7) Closing statement by the complainant;
- 8) Closing statement by the accused student;
- 9) Adjournment; and
- 10) Deliberation by tribunal.

During the hearing, members of tribunal may raise questions to either the complainant or accused student as well as any witnesses. This is done at the direction of the chairperson.

B. Burden of Proof

Students will be presumed not responsible until proven otherwise by a preponderance of evidence. During the hearing, the burden of proof rests upon the University official and/or complainant bringing the charges. During the deliberation, the judicial body shall determine, by majority vote (if the judicial body consists of more than one person), whether the student violated the particular section of the Code of Student Ethics. The judicial body's determination shall be made on the basis of whether it is "more likely than not" that the accused student violated the Code of Student Ethics.

C. Rules of Evidence and Procedure

Most aspects of a college's or University's judicial system differ sharply from those found at state and other outside judicial systems. Colleges and universities, however, adhere to fairness and due process. Nevertheless, formal rules of evidence and procedures followed by courts of law shall not be applicable during hearings. All matters upon which the decision may be based must be introduced into evidence at the proceeding before the tribunal hearing the case. The decision of the tribunal shall be based solely upon such matters. Improperly acquired evidence shall not be admitted. The adjudicating body may exclude evidence that in its judgment is immaterial, irrelevant, or unduly repetitious.

D. Privacy of Proceedings

All informal and formal hearings shall be conducted in private in order to protect the confidential nature of the proceedings, unless the defendant elects to have an open hearing. If the latter is the case, such a request must be in writing by the defendant. However, state and federal laws pertaining to open hearings takes precedence over either the defendants' or the victims' request for an open or closed hearing.

E. Record of the Proceeding

There shall be a record, such as a tape recording, of all formal hearings before a judicial body. The record shall be the property of the University.

F. The Decision

The student shall be notified in writing of the decision within three days of the judicial body's decision. All cases, except those adjudicated by the Coordinator of Student Ethics or a hearing officer, will be decided by majority vote as to both findings and sanctions. The victim or victims have the opportunity to learn of the decision through the Coordinator of Student Ethics. Every defendant shall also be advised in writing of his/her right to appeal the decision.

DISCIPLINARY SANCTIONS

Upon a determination that a student has violated the Code of Student Ethics, the disciplinary sanctions listed below may be imposed, either singularly or in a combination, by the appropriate judicial body. These sanctions are not all-inclusive.

- 1) **Written Reprimand.** A written statement by the Office of Student Ethics that a student's behavior has been inappropriate, and that any further violation of University standards will result in stronger disciplinary action.
- 2) **Probation.** The placing of a student on social and behavioral restrictions for a specified length of time or until a stated condition is met. Furthermore, a violation of the terms could result in suspension or expulsion from the University. Students serving a period of disciplinary probation are entitled to request a hearing under these procedures when accused of a subsequent violation. A student's probation may not be revoked merely because a charge has been lodged against the student.
- 3) **Restitution.** A monetary penalty assessed against the student to cover the cost of services or replacing physical property of the University or student or staff victims which has been stolen, damaged intentionally, or damaged as a result of gross negligence (In cases where the damage is in areas such as residence halls and lounges used jointly by groups of students, and the person responsible for the damage or theft is not known, the penalty may be applied against all students using the facility on a pro rata basis). The payment of a fine by a student or group of students shall in no way negate the right of the University to seek restitution for damages through appropriate civil proceedings.
- 4) **Mandatory Educational/Community Service.** A mandatory participation in a specific educational program, work assignment, or the completion of a research-related assignment. The student is responsible for all related expenses. Failure to comply with the educational/community service sanction could result in suspension from the University.
- 5) **Loss of Privileges.** Denial of specified privileges for a designated period of time.

- 6) **Residence Hall Suspension.** Separation of the student from the residence halls or residence facilities owned by or operated for the institution for a specified length of time, after which the student may be eligible to return. In instances when a student is suspended from a residence facility, he or she may not transfer to another residence facility owned by or operated for the University.
- 7) **Suspension.** Separation from the University for a stated period of time, with conditions of readmission stated in the notice of suspension. Students who are suspended from the University shall be denied access to the institution, including its facilities, grounds, residence halls, activities, or privileges for which the student might otherwise be eligible. After the period of suspension has expired, a student may apply in writing to have the suspension notation on his or her transcript removed.
- 8) **Residence Hall Expulsion.** Permanent separation of the student from the residence halls or residence facilities owned or operated by the institution. In instances when a student is expelled from a residence facility, he or she may not transfer to another residence facility owned by or operated for the University.
- 9) **Expulsion.** Permanent separation of the student from the University. Students who are expelled from the University shall be denied access to the institution, including its facilities, grounds, residence halls, activities, or privileges for which the student might otherwise be eligible. The expulsion notation on the transcript may be permanently posted as determined by the president.

The Coordinator of Student Ethics and/or the Hearing Officer will inform the student of the sanctions in writing. The student will also be informed of the appeal procedure. The findings of the Coordinator of Student Ethics and/or the Hearing Officer will be final unless the student chooses to appeal the decision.

JUDICIAL APPEALS PROCEDURES AND BASIS FOR APPELLATE REVIEW

In each case involving imposition of a disciplinary sanction, the accused shall have the right to appeal the decision. All appeals must be in writing and submitted to the appropriate office within five business days of the original decision. The written request for review must state the grounds for appeal with precision and specify the reasons justifying the assertion of error. The president takes final action in every case decided by the Vice President for Student Affairs, Coordinator of Student Ethics, Student Government Association Judicial Branch, Residential Judicial Board, Board of Student Ethics, or a Hearing Officer, if a student chooses to appeal the decision.

A. Appeals to the Vice President for Student Affairs

A student may initiate an appeal to the Vice President for Student Affairs concerning a decision made by the Coordinator of Student Ethics, the Student Government Association Judicial Branch, the Board of Student Ethics, or a Hearing Officer. An appeal to the Vice President for Student Affairs may be made only on the grounds stated below.

- 1) Failure of the judicial body to follow procedures, including failure to observe the rights of the accused, but only if such failure actually resulted in preventing the accused from adequately defending against the charge.
- 2) The findings are not supported by substantial evidence or the sanctions are not supported by the findings.
- 3) Demonstrated bias on the part of one or more members of the adjudicating body. "Bias" requires more than merely knowing the accused or knowing something about the case. Disqualification occurs only where it can be established that the Coordinator of Student Ethics, a member of the Board of Student Ethics, or SGA Judicial Branch was incapable of rendering a fair decision.
- 4) Whether the sanction imposed by the adjudicating body was excessive, in light of the nature of the offense and the students' disciplinary record.

Exhibit E

AGENCY I.D. # GA0251000

CRN #: 060406 229

ORIGINAL REPORT ()	SUPPLEMENTAL REPORT <input checked="" type="checkbox"/>	REPORT DATE <u>20 April 06</u>
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NARRATIVE

On Thursday 20 April 2006 I, ofc. Lewis Simmons and ofc. Ebony Glaze were informed by Dr. Randy Gunther about members of Commission 2 Love assemble and marching around Felix Alexis Circle. My self and ofc. Glaze interpose the groups and inquired what was going on. The following students listed below stated that they were just walking around Felix Alexis Circle praying. I, ofc. Simmons, advised them because of their affiliation with Commission 2 Love they are not allowed to assemble. Because of past problems involving Commission 2 Love an agreement was made that no activities by this groups will be held on campus. After their disbursement from Felix S. Alexis Circle they later assemble behind King Lear Student Center and conducted a group prayer. Chain of Command Notified.

Students involving this incident: Consuela Johnson, Tasia Murray, Shondanita Myers, Kerica Rawls, Selin Kinsey, Aizama Thompson, Berdra David, Megan Jones, Eric Thomas, Amanda Rose, Tray Zachery, Christopher King, Gabrielle Denson, Taha Harrison, Danyelle Butler, Tesheena Morgan.

This incident happened at 2208 hrs.

REQUIRED DATA FIELDS: TIME: 2330 hrs

SHIFT: 2000-2330 hrs

PAGE 1 OF 1

Chain of Command Notified: Yes No

CLEARED BY ARREST ()	UNFOUNDED ()	EXCEPTIONALLY CLEARED ()
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REPORTING OFFICER: L. Simmons (310)

APPROVED BY: Cpl Dwight J. Williams 305

Exhibit F



**A UNIT OF THE UNIVERSITY SYSTEM OF GEORGIA
SAVANNAH, GEORGIA 31404**

*Office of Computer Services
and Information Technology
Telecommunications Coordinator*

*(912) 351-3815 Telephone
(912) 353-5268 FAX
suggsm@savstate.edu*

To: Commissioned II Love
Ms. Larinda Norwood, President (Certified)
269 E. DeRenne Avenue
Savannah, Georgia 31405

From: Marilyn S. Suggs
Hearing Officer

Re: Savannah State University v. Commissioned II Love (25 April 2006)

Date: May 1, 2006

This is the final report of the Hearing Officer regarding Savannah State University v. Commissioned II Love (April 25, 2006). The charge, specification of the case, summary of facts, and sanctions are articulated below. By copy of this report, Commissioned II Love is advised of their right to appeal the decision of the Hearing Officer.

CHARGE: Level I.1 Zero Tolerance Misconduct (Assault, Harassment & Fighting) and Level I.2 Zero Tolerance (Hazing) of the Savannah State University Code of Student Ethics.

SPECIFICATION: It is alleged that on April 6, 2006, Mr. Desi Campbell and Mr. Xavier Coombs submitted a Savannah State University Police Department Incident Report CRN # 060406229 citing incidents of concern that are possible violations of the Savannah State University Student Code of Ethics.

SUMMARY OF FACTS:

On 7 April 2006 the Assistant Vice President for Student Affairs conducted a preliminary conference regarding the above referenced charges. Ms. Larinda Norwood, President of Commissioned II Love was advised of her right to have the case adjudicated by the Assistant Vice President for Student Affairs, the Board of Student Ethics, or a Hearing Officer. Ms. Norwood pled Not in Violation to the allegations and requested that a Hearing Officer adjudicate the case.

The Hearing was convened on Tuesday, April 25, 2006 at 10:30 am in the Office of Student Affairs, King Frazier Student Center, Room 215.

Mr. Desi Campbell (Complainant) gave testimony concerning the organizations' interaction with him and other students. There was a specific incident in Payne Hall that escalated from a comment to a verbal altercation between him and Ms. Norwood that Mr. Gerald Darden witnessed in part and about which he made a statement at the hearing.

AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

Mr. Campbell also submitted a petition that requested printed names and signatures of persons asked to sign "...to either get C2L to stop harassing people or to be put off campus. Please sign if this group has either offended you in any way or you feel that they are taking the role of Christianity and the idea of real ministry out of context. Thy have now moved from ministry to badgering. Please help stop this cult like mentality."(petition attached)

Mr. Xavier Coombs (Complainant) gave testimony that he resigned from the Commissioned II Love organization voluntarily. Since this resignation, there has been contact with his mother via wireless telephone from Ms. Green who is the cook at the Commissioned II Love's house that he considered harassing as well as comments to him from members of the organization since he left. He also stated that while outside speaking on his wireless phone, a white Cadillac drove up to him occupied by Ms. Norwood and several other people followed by another car and Ms. Norwood told him to "Shut your mouth. Stop talking".

Mr. Coombs also stated that he washed the feet of another member of Commissioned II Love and that he jumped in the ocean at Tybee Island along with the other Commissioned II Love members. Under cross examination by Ms. Norwood, he stated that he felt that he had to do these things as a part of membership in the organization. When asked by Ms. Norwood if there were others that had not done these things but were a members, Mr. Coombs did not recall any others that had not done these things and if not, whether they were considered members of Commissioned II Love.

Ms. Larinda Norwood, President of Commissioned II Love (defendant) provided testimony as follows:

Ms. Larinda Norwood told the Hearing Officer that these charges stem from anger that had escalated over Mr. Campbell's choir experiences and Mr. Coombs alleged reasons for leaving Commissioned II Love. Ms. Norwood stated that she remembers the incidents presented by both Mr. Campbell and Mr. Coombs but her perception of how they were initiated was in direct contrast to the statements made by the complainants.

Ms. Norwood admitted that there was a verbal altercation with Mr. Campbell but disagreed with how it started. Ms. Norwood also gave testimony that she did in fact approach Mr. Coombs from a vehicle and told him to shut his mouth. She also gave testimony that Mr. Coombs did submit to foot washing and that he indeed jumped into the ocean during a ceremony held on Tybee Island, however it was not a baptismal. Statements from Ms. Anissa M. Stephens and Ms. Angela Holloway reiterate that this was not a baptismal. (attached)

Several witnesses spoke to the basis of this action being due to anger on the part of Mr. Coombs. There were multiple statements that these differences should have been settled by means other than a "world" court.

1. Based on the testimonies from the complainants (Mr. Campbell and Mr. Coombs), the defendant (Commissioned II Love, Larinda Norwood, President), the Hearing Officer did find 'cause of concern' with the admitted contact by Commissioned II Love with both complainants and others unwelcome and consistent with causing them to be reasonably apprehensive. Furthermore, the Hearing Officer did find 'cause of concern' with the processes voluntarily submitted to by Mr. Coombs as part of his membership in the organization as a precondition to his acceptance, or membership in Commissioned II Love. The campus organization's leadership and its external (non-institutional) advisement of this organization was a "cause of concern" for this Hearing Officer. Ms. Norwood stated that the organization is incorporated and based on that are allowed to have activities outside of the university as well as mention of an overseeing minister from outside the state of Georgia that serves as an advisor.

Recommendations from the Hearing Officer:

The Hearing Officer recommends to the Vice President for Student Affairs to immediately accept the following sanctions to bring final resolve to the case of Savannah State University v. Commissioned II Love

- a. **Suspended** from Savannah State University from 2 May 2006 to 1 January 2007 as prescribed:
- Commissioned II Love will not participate or conduct any activities during this period;
 - Commissioned II Love will not congregate during this period;
 - Commissioned II Love will not wear its paraphernalia during this period;
 - Commissioned II Love will not solicit membership from any SSU students during this period.
 - Commissioned II Love will not participate in meetings, step shows, or other 'underground' activities on campus or off campus during this period.

- b. **Community Service** while suspended:

Commissioned II Love must provide written documentation (before allowed back on-campus January 2007) of the organization's participation in a service learning project; and/or a community service project; and/or mentoring project; and/or a volunteerism project; and/or a leadership project at a local public school and/or a local non-profit organization.

NOTE: Whatever project(s) the organization chooses, the project(s) are to be constructive in nature, such as work projects or social service projects and must be approved by the Office of Student Ethics so as to determine their suitability and appropriateness with respect to the violations.

- c. **Probation** through Spring 2008

Commissioned II Love will face suspension or permanent expulsion from the University should you violate the Student Code of Ethics during this period for the **same infraction**.

NOTE: An organization serving a period of disciplinary probation is entitled to request a hearing under these procedures when accused of a subsequent violation. A organization's probation may not be revoked merely because a charge has been lodged against the organization.

- d. **Plan of Action & Amendments** to the Commissioned II Love's Constitution demonstrating the organization's commitment to University policies & procedures upon return to the campus (due to the Office of Student Ethics on or before 1 July 2006).

APPEAL

Should you wish to appeal these sanctions, you may do so by submitting a written appeal to the Vice President of Student Affairs within **five business days** of the original decision as noted in the Savannah State University Student Handbook.

ENCLOSURES (3): Copy of Petition (11 sheets)
 Letter from Ms. Anissa M. Stevens
 Letter from Ms. Angela Y. Holloway

cc: Dr. Carlton E. Brown, President
 Dr. Randy Gunter, Vice President for Student Affairs
 Dr. Irvin Clark, Assistant Vice President for Student Affairs
 Mr. Desi Campbell
 Mr. Xavier Coombs
 Student Ethics File

Exhibit G



SAVANNAH STATE UNIVERSITY
A UNIT OF THE UNIVERSITY SYSTEM OF GEORGIA
SAVANNAH, GEORGIA 31404

Center for Student Ethics
KING -FRAZIER COMPLEX, RM 225
TELEPHONE: (912) 356-2194

FAX: 912-356-2464

8 September 2006

ORGANIZATION EXPULSION NOTIFICATION

Commissioned II Love

Ms. Larinda Norwood, President (Sent Certified Mail - -E-mailed Larindalady@yahoo.com and C21. Ministries@bellsouth.net)
269 E. DeRenne Avenue
Savannah, Georgia 31405

Dear Ms. Norwood,

The Office of Student Affairs is in receipt of written complaint from a concerned parent of a student that identifies themselves as a member of Commissioned II Love. In particular, this parent is concerned about a trip to Orlando, FL (Disney World) that Commissioned II Love has planned for this weekend (8-10 September 2006). Furthermore, the Office of Student Affairs is in receipt of written complaint from a student that alleges that members of Commissioned II Love are questioning students who signed the petition against the organization last spring. Please know that the organization is in violation of the sanctions imposed by the Hearing Officer on 1 May 2006 (ref. attachment). Further, the sanctions delivered at that time have not been amended or modified. Therefore, in keeping with the sanctions rendered by the Hearing Office on 1 May 2006 the campus organization Commissioned II Love is hereby **EXPELLED AND DEACTIVATED AS AN ORGANIZATION** from Savannah State University effective **IMMEDIATELY**. According to Savannah State University Code of Student Ethics:

Expulsion. Permanent separation of the organization from the University, Organizations expelled from the University shall be denied access to the institution, its facilities, grounds, residence halls, activities, or privileges for which the organization might otherwise be eligible (page 52 of the 2006-2007 Student Handbook).

EXPULSION NOTIFICATION: Commissioned II Love
Page Two: 8 September 2006

Organization Deactivation - - Loss of privileges, including University recognition for a specific period time or permanently. Loss of privileges may include, but is not limited to a prohibition on social events, fund-raising projects, intramural events, and completion of community service hours and special projects (page 52 of the 2006-2007 Student Handbook).

APPEAL

Should you wish to appeal these sanctions, you may do so by submitting a written appeal to the Vice President for Student Affairs within **five business days** of the original decision on the grounds for appeal as stated on pages 52-54 of the 2006-2007 Savannah State University Handbook.

Sincerely,



Irvin Clark, Ed.D.
Assistant Vice President for Student Affairs

ENCLOSURE (1): Copy of Sanctions from the Hearing Officer (dated 8 May 2006)

Cc: Dr. Carlton E. Brown, President
Dr. Randy Gunter, Vice President for Student Affairs
Chief Thomas Trawick, Chief of Police
Mr. Gary Oliver, Director for Student Programs & Organizations
Student Ethics File