

# **EXHIBIT N**



UNIVERSITY OF  
SOUTH CAROLINA

Equal Opportunity Programs

November 24, 2015

Ross Abbott  
Sent electronically to abbotr2@email.sc.edu

RE: Formal Complaint of [REDACTED]

Complaint Number: 20150091

Dear Mr. Abbott,

Enclosed is a copy of the Notice of Charge of in this matter, in addition to a copy of the official Complaint of Discrimination filed by the above-cited Complainant, [REDACTED]

Please contact this office within the next five (5) working days, by December 1, 2015, to arrange an appointment to fully discuss the charges as alleged. With respect to a complaint that is filed with this office we shall as a matter of policy attempt to resolve the complaint through mutually agreeable mediation. Should we be unable to mediate a complaint we shall move to investigate the complaint and we shall upon the completion of our investigation, issue to all parties a copy of our findings and recommendations which we shall make to the Provost and President of the University.

Please be advised that you are not to contact [REDACTED] regarding this matter while it is under investigation. Please also refrain from discussing this complaint with any member of the faculty, staff or student body.

Should you need any additional information at this time please contact me at 803-777-9560.

Sincerely,

A handwritten signature in blue ink that reads "Carl R. Wells".

Carl R. Wells  
Asst. Dir. EOP

CC: Henry White, University Lawyer



# UNIVERSITY OF SOUTH CAROLINA

Bias Report  
Submitted on November 23, 2015 at 10:18:26 pm EST  
Last modified November 24, 2015 at 12:21:42 pm EST

Type: **Student Witness**  
Urgency:

Incident Date: **2015-11-23**  
Incident Time: **2:00 pm**  
Incident Location: **Russell House Greene St. in front of Russell House**

Reported by

Name: [Redacted]  
Title: [Redacted]  
Email: [Redacted]  
Phone: [Redacted]  
Address: [Redacted]

Involved Parties

**Ross Abbott** [Redacted] [Redacted] abbotr2@email.sc.edu  
Off Campus  
[Redacted] [Redacted] [Redacted] [Redacted]  
Off Campus

Questions

\* Reasons for the Report  
Check all that apply:  
Hostile Environment, Racial Discrimination

\* Description/Narrative  
Please provide the facts of the incident in as much detail as possible. Describe what happened in chronological order using specific, concise, objective language (who, what, where, when, why and how).  
The College Libertarians hung several offensive signs at their event on Greene St today. One poster depicted a swastika, another had the word "Wetback" on it and described what the slur meant. Another sign was a dry erase board which asked "reasons USC wifi blows," referencing the incident last year where a girl wrote a racist message on a dry erase board. The other signs mocked the concept of a "safe space" by saying that these spaces, which serve to give minority students space, deprived them of their free speech. These students seem to want to use university resources and space to post offensive symbols and racial slurs.

\* Optional Questions  
How did the bias incident affect you?  
This is especially annoying to student organizers who go out of our way at our events to make sure that we limit cursing and sexual innuendo in order to make our events more palatable to members of administration. As an LGBTQ student on campus, the swastika is a reminder of the murders of 11 million people, many of which were LGBTQ. I had a Jewish student approach me after arguing with the people putting on the event and she was clearly very upset from their refusal to listen to what she said. I don't believe that USC wants to cultivate an environment where swastikas and racist slurs are welcomed on Greene St. I'd also like to note that several tour groups passed by while this was happening.

\* Other than completing this form, is there any other action that you took?  
Gathered attention to the issue via social media.

\* What do you think is the appropriate action for the Office of Diversity and Inclusion or the Office of Equal Opportunity Programs to take? (Please note that the action that the office takes is not solely up to the complainant. There may be instances when we are required to take the issue further than the complainant might prefer.)

At the very least, there needs to be a conversation with the leadership of the College Libertarians to address this incident and make sure it won't happen again. I believe that the students violated their representation of USC and should lose access to University funding for future events.

\* Have you reported the incident to another University of South Carolina office?

No

\* Type of incident (check all that apply)

Written Slur / Graffiti, Hate Symbol

\* Specify (Other type of incident)

Swastika and "wetback" were written.

\* Harm the Complainant experienced as a result of the incident?

Many students were visibly upset. Some are still messaging that they cannot calm down and that they can't believe that this is happening at our university. Many students are shocked.

\* Type relief and corrective actions the Complainant is seeking?

I'm fine. I would just like to see that student organizations are not welcomed to hold racist symbols and slurs in front of the university.

#### Attachments

fullpicture.jpg  
safespace.jpg  
swastika.jpg

*Pending IR #00000372*

*Submitted from 71.68.146.231 and routed to Carl R. Wells (Asst. Dir. EOP)*

*Modified by Carl R. Wells on November 24, 2015 at 12:21:42 pm EST from 129.252.66.91*



Handwritten text on a sign, partially illegible.

Handwritten text on a sign, partially illegible.

Handwritten red swastika symbol.

Handwritten text on a sign, partially illegible.

STOP...  
Handwritten text on a sign.

Wetback  
Handwritten text on a sign.

SAFE SPACE  
Handwritten text on a sign.



Reasons why USC wife blows a

- 
- 
- 
- 
- 

Make your own list in  
a spread of this content  
under 1 min a day  
off - 100%  
no charge

SAFE  
SPACE

WARNING: L&A W/ BOTTLE RETURN PROLONG  
BEHIND A-10000



MEET YOUR  
MATCH





Bias Report  
Submitted on November 23, 2015 at 10:20:16 pm EST

Type: **Student**  
Urgency: **Witness**

Incident Date: **2015-11-23**  
Incident Time: **2:30 pm**  
Incident Location: **Russell House Greene Street center left location**

Reported by

Name:  
Title:  
Email:  
Phone:  
Address:

Involved Parties

Questions

Reasons for the Report

Check all that apply:

**Color Discrimination, Gender Discrimination, Hostile Environment, Racial Discrimination, Religious Discrimination**

Description/Narrative

Please provide the facts of the incident in as much detail as possible. Describe what happened in chronological order using specific, concise, objective language (who, what, where, when, why and how).

**The college libertarians/young Americans for Liberty on campus staged a tabling event that I witnessed at 1:13pm, where they had multiple offensive signs up on Greene street, one with the definition of a "wetback", one with a swastika, another with offensive information about Israel/Palestine, and one that even had a white board available for USC students to write their own opinions on why "USC wifi sucks", referencing the spring white board incident. This was extremely inappropriate, and very triggering to students on campus. It showed tours of campus how bigoted our student body can be. After witnessing it at 1:13pm, I notified Russell house, who said they would move the tabling event to the free speech zone outside of the Greene street gates. However, at 3:14pm when I left campus, they were still in front of Russell house, with swastikas, and engaging rudely with USC students, saying sexist and racist statements.**

Optional Questions

How did the bias incident affect you?

Other than completing this form, is there any other action that you took?

**Notifying Russell House and the director of OMSA.**

What do you think is the appropriate action for the Office of Diversity and Inclusion or the Office of Equal Opportunity Programs to take? (Please note that the action that the office takes is not solely up to the complainant. There may be instances when we are required to take the issue further than the complainant might prefer.)

**Advise student organizations to abide by the free speech zones when they desire to engage in hate speech, do not allow symbols that could incite a riot to be present on Greene street, and do not subject other students & prospective students to seeing inflammatory posters and offensive imagery when they are simply trying to enjoy Greene street.**

Have you reported the incident to another University of South Carolina office?

**No**

Type of incident (check all that apply)

**Verbal Harassment, Written Slur / Graffiti, Hate Symbol**

Specify (Other type of incident)

**Posters, verbal comments**

Harm the Complainant experienced as a result of the incident?

**Triggering**

Type relief and corrective actions the Complainant is seeking?

**Don't allow this to happen again.**

Attachments

image.jpeg

*Pending IR #00000373*

*Submitted from 162.200.233.22 and routed to Carl R. Wells (Asst. Dir. EOP)*





Bias Report  
Submitted on November 24, 2015 at 12:22:50 am EST

Type: **Other**  
Urgency: **Third-party (received report)**

Incident Date: **2015-11-23**  
Incident Time:  
Incident Location: **Other**

Reported by

Name:  
Title:  
Email:  
Phone:  
Address:

Involved Parties

Questions

Reasons for the Report

Check all that apply:

**Hostile Environment, Religious Discrimination**

Description/Narrative

Please provide the facts of the incident in as much detail as possible. Describe what happened in chronological order using specific, concise, objective language (who, what, where, when, why and how).

**A flag with a Nazi symbol was displayed on campus, and the offenders refused to remove it, citing "free speech" as their reason.**

Optional Questions

How did the bias incident affect you?

**It's disgusting to think that such a well-known hate symbol is flown on a campus with Jewish students.**

Other than completing this form, is there any other action that you took?

**No.**

What do you think is the appropriate action for the Office of Diversity and Inclusion or the Office of Equal Opportunity Programs to take? (Please note that the action that the office takes is not solely up to the complainant. There may be instances when we are required to take the issue further than the complainant might prefer.)

**Issue an apology for letting the symbol appear and punish the offenders accordingly.**

Have you reported the incident to another University of South Carolina office?

**No**

Type of incident (check all that apply)

**Hate Symbol**

Specify (Other type of incident)

**Nazi symbol displayed on campus without being removed.**

Harm the Complainant experienced as a result of the incident?

**A Jewish friend was violently triggered by seeing the symbol, and now feels unsafe on campus.**

Type relief and corrective actions the Complainant is seeking?

**For this to be acknowledged as a hate crime against USC's Jewish population, for an apology to be issued, and for this incident to be avoided in future.**

*Pending IR #00000374*

*Submitted from 108.23.208.174 and routed to Carl R. Wells (Asst. Dir. EOP)*