

No. 19-3389

**United States Court of Appeals
for the Eighth Circuit**

INTERVARSITY CHRISTIAN FELLOWSHIP/USA AND INTERVARSITY
GRADUATE CHRISTIAN FELLOWSHIP,

Plaintiffs-Appellees,

v.

THE UNIVERSITY OF IOWA, ET AL.,

Defendants-Appellants.

On Appeal from the United States District Court
for the Southern District of Iowa
No. 3:18-cv-00080

APPELLEES' APPENDIX VOL. 3

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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
EASTERN DIVISION**

INTERVARSITY CHRISTIAN
FELLOWSHIP/ USA, and INTERVARSITY
GRADUATE CHRISTIAN FELLOWSHIP,

Plaintiffs,

v.

THE UNIVERSITY OF IOWA; BRUCE
HARRELD, in his official capacity as
President of the University of Iowa and in his
individual capacity; MELISSA S. SHIVERS,
in her official capacity as Vice President for
Student Life and in her individual capacity;
WILLIAM R. NELSON, in his official
capacity as Associate Dean of Student
Organizations, and in his individual capacity;
ANDREW KUTCHER in his official capacity
as Coordinator for Student Organization
Development; and THOMAS R. BAKER, in
his official capacity as Student Misconduct
and Title IX Investigator and in his individual
capacity,

Defendants.

Civ. Action No. 18-cv-00080

APPENDIX VOLUME II-A

**OF PLAINTIFFS' STATEMENT
OF MATERIAL FACTS IN
SUPPORT OF PLAINTIFFS'
MOTION FOR PARTIAL
SUMMARY JUDGMENT**

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1 IN THE UNITED STATES DISTRICT COURT
 2 FOR THE SOUTHERN DISTRICT OF IOWA
 EASTERN DIVISION

3 BUSINESS LEADERS IN
 4 CHRIST, an
 5 unincorporated
 association,

6 Plaintiff,

7 vs.

8 THE UNIVERSITY OF
 9 IOWA; LYN REDINGTON,
 in her official
 10 capacity as Dean of
 Students and in her
 11 individual capacity;
 THOMAS R. BAKER, in
 12 his official capacity
 as Assistant Dean of
 13 Students and in his
 individual capacity;
 14 and WILLIAM R. NELSON,
 in his official
 15 capacity as Executive
 Director, Iowa
 16 Memorial Union, and in
 his individual
 17 capacity,

18 Defendants.

CASE NO. 3:17-CV-00080

Deposition of

NADINE C. PETTY

19 Deposition of NADINE C. PETTY, taken before
 20 Julie M. Kluber, Certified Shorthand Reporter,
 21 commencing at 1:20 p.m., September 20, 2018, at
 2500 Crosspark Road, Room W219, Coralville,
 22 Iowa.

23 Julie M. Kluber, CSR, RMR
 24 3515 Lochwood Drive NE
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1 NADINE C. PETTY,
 2 called as a witness, having been first duly
 3 sworn, testified as follows:
 4 DIRECT EXAMINATION
 5 BY MR. BLOMBERG:
 6 Q. Hi, Miss Petty. My name is Daniel Blomberg.
 7 I'm counsel for the plaintiffs in this case.
 8 Just a couple ground rules that I'll go over
 9 before we get started. One your counsel George
 10 just mentioned; that is, we'll both try to
 11 speak as slowly as we reasonably can for
 12 purposes of our court reporter.
 13 If you could please wait for me to finish
 14 my questions before you start an answer, and I
 15 will wait for you to finish your answer before
 16 I start on my next question. If you could
 17 please provide verbal answers, so if I ask you
 18 a yes-or-no question, say yes or no, because
 19 she can't record a head shake or a nod or
 20 something like that.
 21 A. Yes.
 22 Q. Perfect, perfect. If you don't understand my
 23 question, please just ask me to repeat it or,
 24 you know, repeat it back to me so we make sure
 25 we're understanding each other. If you need to

1 take a break any time, let me know. I don't
 2 think we'll go so long that you'll need to, but
 3 if you do, feel free to.
 4 A. Okay.
 5 Q. Could you please state your full name for the
 6 record.
 7 A. Nadine Cecelia Petty.
 8 Q. And are you an employee of the university?
 9 A. Yes.
 10 Q. How long have you been employed at the
 11 university?
 12 A. Three years.
 13 Q. And what position do you currently hold?
 14 A. Executive director for the Center for Diversity
 15 and Enrichment.
 16 Q. And have you always held that position?
 17 A. At the university, yes.
 18 Q. Okay. Before you came to the university, where
 19 else did you work?
 20 A. The University of Louisville, and do you want a
 21 progression of --
 22 Q. Sure.
 23 A. University of Louisville. Before then was
 24 Southwestern Illinois College. Before then I
 25 was teaching at high schools in various states.

1 Q. Okay, great, great. And what's your
 2 educational background as far as your training?
 3 A. My degrees are based on education so I have a
 4 bachelor's of arts in English, I have a
 5 master's of arts in teaching secondary English
 6 education, and I have a Ph.D. in educational --
 7 organizational effectiveness and leadership,
 8 higher leadership.
 9 Q. Have you ever been deposed before?
 10 A. No.
 11 Q. Do you understand that you're here today as a
 12 witness on behalf of the university?
 13 A. Yes.
 14 Q. All right. Let me show you a document that's
 15 been previously marked as Exhibit 2. Have you
 16 seen that document before?
 17 A. I -- No, not to my recollection. I don't
 18 think so.
 19 Q. Could you look at Number 4 on the page that you
 20 currently have open and read that quietly to
 21 yourself, and just let me know when you're
 22 done.
 23 A. I'm done.
 24 Q. Have you seen that language before?
 25 A. Yes.

1 Q. Okay. So do you understand that you have been
 2 designated by the university to testify on the
 3 material in Number 4, with the exception of the
 4 portion regarding admissions policies?
 5 A. Yes.
 6 Q. Okay. Did you do anything to review to prepare
 7 for today's deposition other than talk to your
 8 counsel?
 9 A. Not in particular, no.
 10 Q. All right. Did you look at any documents?
 11 A. No.
 12 Q. Did you speak with anyone other than to your
 13 counsel?
 14 A. No.
 15 Q. What role do you have in administering
 16 scholarships for the university?
 17 A. My role is strictly in managing scholarships
 18 that have been administered.
 19 Q. Okay. So that's after the awards have already
 20 been determined?
 21 A. That is correct.
 22 Q. Are you familiar with the determination
 23 process?
 24 A. Yes.
 25 Q. Okay. So you can speak to how someone might be

1 selected to receive a certain scholarship.
 2 A. Yes.
 3 Q. Okay. And what university departments are
 4 responsible for making the initial selection?
 5 A. It would depend on the specific scholarship in
 6 question.
 7 Q. Okay.
 8 A. But the two departments I work with are the
 9 Office of Student Financial Aid and also
 10 Admissions.
 11 Q. Okay. So those two offices are generally
 12 involved within the -- you know, the selecting
 13 someone who is going to be eligible for a
 14 scholarship?
 15 A. To some extent, yes.
 16 Q. Okay. What other departments would be involved
 17 with that selection?
 18 A. To my --
 19 Q. It doesn't have to be an exhaustive list.
 20 A. Yeah. To my knowledge, that would be it. As
 21 far as selection, sometimes our office may help
 22 with selections depending not on the main
 23 scholarships but if there's maybe a question or
 24 maybe -- I'm just going to use the word "tie."
 25 If we only have a spot for ten scholarships and

1 they're at -- we're at the tenth spot and there
 2 are two students who are pretty equitable, then
 3 we maybe act to make a determination, yeah.
 4 Q. Okay. Then the previous witness, Mr. Brent
 5 Gage, spoke to his familiarity with merit-based
 6 scholarships. He said there are about 16 that
 7 his department administered and he was involved
 8 with. Do you know about how many other
 9 scholarships the university has?
 10 A. I do not.
 11 Q. Do you have an estimate? Is it twenty? Two
 12 hundred? Two thousand?
 13 A. I couldn't even begin to estimate.
 14 Q. Okay.
 15 A. I focus only on what my office manages.
 16 Q. Okay. So you're not familiar with any of the
 17 other offices and the scholarships they
 18 administer?
 19 A. I may or may not be. It depends on if you're
 20 referring to a specific scholarship. I am most
 21 familiar with the ones that we administer or
 22 manage --
 23 Q. Okay.
 24 A. -- in our office.
 25 Q. What scholarships do you administer?

1 A. So we manage the Advantage Iowa scholarship, we
 2 manage the Storm Lake scholarship.
 3 Q. Okay.
 4 A. And we also -- and these aren't exactly
 5 scholarships but we administer -- both
 6 administer and manage some what we call grant
 7 aid through our TRIO program. It's a federal-
 8 funded grant program.
 9 Q. And what is that?
 10 A. What is TRIO?
 11 Q. Yes, what is that?
 12 A. It's a -- it's a department basically -- or
 13 it's a program that's meant to help with first-
 14 generation, low-income, and/or disabled
 15 students, and so the students who come to the
 16 university if they qualify, they apply and
 17 there's a review process, an intake process,
 18 and students who are TRIO students then in
 19 essence have academic coaches or success
 20 coaches that guide them through the four years
 21 that they're there.
 22 Q. Gotcha.
 23 A. And so they're objectives set by the federal
 24 government based on retention and graduation
 25 for those students.

1 Q. Okay. And the three criteria I think I heard,
 2 one was first generation, I missed the second,
 3 and the last one was disabled.
 4 A. Yeah, low income.
 5 Q. Low income, okay.
 6 A. And it's not all three, it's either/or or a
 7 combination.
 8 Q. Yeah, I heard you mention or, okay. So a
 9 student might be first generation and not low
 10 income or disabled but they still could be
 11 eligible?
 12 A. Yes.
 13 Q. Okay. When you say first generation, what do
 14 you mean?
 15 A. So first generation would be any student whose
 16 parent does not have a college degree and for
 17 the terms of this program, it would be a
 18 bachelor's degree.
 19 Q. Okay. So you're looking at the first
 20 generation to go to school within that family,
 21 a college.
 22 A. Yes, to -- yes.
 23 Q. Okay. What is the threshold for income, do you
 24 know?
 25 A. It is the federal low-income guidelines. I

1 don't have that number, so it's based on how
 2 many -- so it's based on how many people are in
 3 the family and then what the actual income is,
 4 and then we're given a chart, and then we just
 5 compare family number to what that income is.
 6 Q. Okay, great. And the disabilities, are there
 7 any particular class of disabilities that are
 8 eligible, or how do you determine what --
 9 A. So the federal language says it has to be
 10 verifiable.
 11 MR. CARROLL: Just a minute. Make sure
 12 he's finished first.
 13 THE WITNESS: Oh, I'm sorry.
 14 MR. CARROLL: It's okay. It's just --
 15 THE WITNESS: Yes, because she can't --
 16 A. Do you want to repeat?
 17 Q. You're doing great. So you're saying the
 18 federal guidelines and then --
 19 A. Says it has to be a verifiable disability.
 20 Q. Okay. And what is a verifiable disability?
 21 A. So a disability that we can verify either
 22 through disability services on campus, maybe
 23 the student has some sort of documentation to
 24 prove their disability, something from their
 25 previous school, just anything we can verify

1 and document so that if we're audited by the
 2 federal government we can say, yes, this
 3 student was eligible for the program.
 4 Q. And are there classes of disabilities that
 5 you're looking for or how do you define
 6 disability?
 7 A. We are not looking for any classes. So a
 8 disability would be just defined as any
 9 individual that has either a physical ailment
 10 or could also be a mental ailment, and those
 11 would be falling under disability.
 12 Q. So a student that has been diagnosed with
 13 depression, for instance. Would they be
 14 disabled?
 15 A. If the depression caused some sort of challenge
 16 for them; challenge for success, in other
 17 words. Not all students who are diagnosed with
 18 depression are then termed disabled.
 19 Q. Okay. That makes sense. Any other examples of
 20 disabilities that you've seen, you know,
 21 students with disabilities who have been
 22 awarded this scholarship?
 23 A. The grant aid? It could be anything. It could
 24 be a physical disability, they could be in a
 25 wheelchair, they could be learning disabled. I

1 mean they could just -- the range is -- there's
 2 no cap on that, as long as they're verifiable
 3 disability.
 4 Q. Okay. And then can you talk to me, you
 5 mentioned the Advantage Iowa program and the
 6 Storm Lake scholarship program. Can you talk
 7 to me about what the Advantage Iowa program is?
 8 A. So the Advantage Iowa program is a scholarship
 9 the university offers in order to recruit
 10 underrepresented students to the institution
 11 and also to recruit first-generation students
 12 to the institution.
 13 Q. And what would be examples of the kind of
 14 underrepresented student you're looking for?
 15 A. So the categories are -- it would be black,
 16 Hispanic or Latino, Native American, or
 17 Asian -- or Pacific Islander. Not Asian,
 18 Pacific Islander.
 19 Q. So when you're looking at the criteria for who
 20 would qualify for the Advantage Iowa, you're
 21 looking at the first-generation criteria you
 22 mentioned earlier, then you're looking at one
 23 of those classifications, and someone who meets
 24 both of those would be eligible or how does
 25 that work?

1 A. No, it would be either/or, not both.
 2 Q. Okay.
 3 A. And for the first-generation criteria, it would
 4 be specific to anyone who took part in an
 5 Upward Bound program, so it gets a little bit
 6 more --
 7 Q. Specific?
 8 A. -- specific, yes.
 9 Q. Sorry. I was stepping on you there, but thank
 10 you.
 11 A. That's okay.
 12 Q. Okay, so it's either/or. The first generation
 13 who participated in the Upward Bound program?
 14 A. Yes.
 15 Q. They could be eligible under the Advantage
 16 Iowa?
 17 A. Yes.
 18 Q. All right. Or someone who would be African-
 19 American, Latino, Pacific Islander?
 20 A. Or Native American.
 21 Q. And they would be eligible under the Advantage
 22 Iowa program?
 23 A. Yes.
 24 Q. And what does the Advantage Iowa program
 25 provide?

1 A. So it provides both a need-based scholarship
2 and an income-based -- It's a merit
3 scholarship so first it's a merit scholarship,
4 and you have to first be eligible for that. So
5 if you're awarded the merit-based program, the
6 Office of Student Financial Aid will then look
7 at a student's need and if there is need there,
8 there's income there, then they're given a
9 need-based scholarship to help cover any
10 financial gaps. So that's the fiscal part.

11 The other part of it is through our center
12 we provide, then, strenuous monitoring of the
13 students, and so the students are required to
14 adhere to certain requirements. For example,
15 they have to come to our office and meet with
16 an academic coach each semester, so there are
17 check-ins, there are programs they have to
18 attend, and it's all there to make sure they're
19 as successful as possible.

20 Q. That makes sense.

21 A. Yeah.

22 Q. That makes sense. So for a Caucasian student
23 to be eligible for the Advantage Iowa program,
24 they would have to fit under the Upward Bound
25 side of the first-generation criteria.

1 A. Yes.

2 Q. Okay. Can you tell me what the Storm Lake
3 program looks like?

4 A. The Storm Lake program is a scholarship program
5 for first-generation and low-income students.
6 Students who attend Storm Lake High School are
7 eligible for the program, and so they have to
8 apply. The Office of Student Financial Aid
9 receives the applications, and there's a
10 certain amount of funding that is put in place
11 for this particular scholarship, and students
12 are awarded first come, first served until the
13 monies are diminished.

14 Q. Okay. And so that's indexed to a specific high
15 school that people are coming out of?

16 A. Yes.

17 Q. So how did that start? That seems a little
18 oddly specific, so how did that start?

19 A. I don't know. I can't really speak to it. It
20 was in place before I started at the
21 university.

22 Q. Okay. But somebody created a scholarship, an
23 endowment, and said people coming through this
24 high school who fit the other scholarship
25 criteria are folks I want to give this award

1 to?

2 A. Yes.

3 Q. Okay. Other than those three -- I think we
4 talked about the Advantage Iowa, the Storm
5 Lake, and the grant aid TRIO program -- are
6 there any other ones that you specifically are
7 involved with or your department is?

8 A. Not as far as scholarships, no.

9 Q. All right. What would be other types of aid
10 programs or assistance that you would be
11 involved with?

12 A. Student emergency funding, and those are all
13 through private donors.

14 Q. Okay. So what would be an example of student
15 emergency funding?

16 A. A student comes in because they maybe lost
17 their job and they're about ready to be evicted
18 from their apartment, which affects their
19 academic performance, and there's a trickle
20 effect, and so we may assist that program with
21 a month's rent or may assist the student in
22 other ways depending. Sometimes they don't
23 have food to eat. Sometimes it may be a death
24 of a family member or they need an emergency,
25 you know, plane ticket or bus ticket to get

1 home and it may be that. It just depends, but
2 we deem it an emergency if it's something the
3 student cannot take care of on their own and if
4 it will cause undue duress or potentially
5 hinder their ability to be successful in any
6 academic semester.

7 Q. Gotcha. That makes sense. The administration
8 of scholarships through your department and
9 other university departments, those are going
10 to be subject to standard university policies.
11 Correct?

12 A. Yes.

13 Q. That would include things like the university's
14 human rights policies?

15 A. I'm not a lawyer. I don't have legal expertise
16 so I'm not going to answer that question.

17 Q. All right. So you don't have any knowledge,
18 though, of whether or not a scholarship program
19 would be administered in violation of the human
20 rights policy?

21 A. I, again, am not going to answer that question.
22 I don't know.

23 Q. All right. So the answer is you don't know --

24 A. Yeah.

25 Q. -- whether or not it would be administered in

1 violation of the policy?
 2 A. My -- I can say that any scholarship that we
 3 administer or manage is not a scholarship that
 4 would be exclusive of any particular group, so
 5 all of our scholarships we have 100 percent
 6 representation; right? We allow any student to
 7 take part in it. We don't exclude anyone,
 8 although we may have preferential targeting for
 9 different reasons, whether it be recruiting or
 10 to support academic success or whatever it may
 11 be, but there's no exclusion of any particular
 12 group.
 13 Q. What do you mean by preferential targeting?
 14 What does that look like?
 15 A. Like for the recruiting, for example, like for
 16 the Advantage Iowa scholarship, and so for
 17 students to get that particular scholarship
 18 they have to, of course, first apply to the
 19 institution. There's no application process,
 20 so the admissions office will then take the
 21 student's application and then see whether or
 22 not they have the merit base, and that's the
 23 very first thing they need.
 24 So they need a particular GPA, they need a
 25 particular ACT score, and then the institution

1 looks at the student and says, "This is a
 2 student that we want. We don't want them to go
 3 to another institution and so we're going to
 4 try to recruit them here," and so that's the
 5 purpose of the scholarship; right? It's to
 6 say, "Here, we're going to give you this
 7 particular amount of money so that we can try
 8 to get you here and not to another
 9 institution."
 10 The targeting would be that we don't
 11 have -- So part of the mission and part of the
 12 strategic plan of the university is to try to
 13 increase diversity on campus and diversity in
 14 all kinds of spectrums and all kinds of ways,
 15 and so part of doing that and part of the way
 16 that we can help to ensure that we do that is
 17 by trying to recruit, and that's what I mean
 18 when I say targeted populations; right?
 19 Because we look at populations that are not
 20 represented on campus, and then we try to
 21 encourage them by, you know, giving them
 22 incentives to apply, and essentially that's a
 23 scholarship.
 24 Q. What would be examples of some of the
 25 populations that aren't as represented on

1 campus and that you are targeting and trying
 2 to -- I think we -- we talked about the
 3 Advantage Iowa one. Would that be an example
 4 of some populations that you're trying to --
 5 A. That's --
 6 Q. -- recruit?
 7 A. Yeah. That's a scholarship that 100 percent
 8 targets populations we're trying to recruit,
 9 yes.
 10 Q. Okay. What would be other examples?
 11 A. In my office? That my office does or --
 12 Q. Or that the university does, since you're
 13 speaking on behalf of the university, just to
 14 your knowledge.
 15 A. To my knowledge, the university has a
 16 scholarship for Native American students who
 17 identify as Iowa First Nations, so they have to
 18 be able to verify that they are from a tribe
 19 that is one of the Iowa First Nation tribes,
 20 and there is some sort of financial incentive
 21 there as well.
 22 Q. I think I might know what that one's called.
 23 Is that the Iowa First Nations Tuition Program?
 24 A. Yes.
 25 Q. Okay. And so the way that one works, and

1 correct me if I'm wrong, but it's if you're
 2 from a tribe that historically was a First
 3 Nations tribe in Iowa, you can get in-state
 4 tuition even if you're not a resident of Iowa.
 5 Does that sound right?
 6 A. Yes, that is my understanding.
 7 Q. Okay. And so that would be an example of
 8 trying to target underrepresented populations
 9 and kind of encourage them to attend the
 10 university.
 11 A. That is correct.
 12 Q. Okay. What would be other examples that you're
 13 aware of?
 14 A. That is the only example outside of my office
 15 that I am -- at this moment coming to mind,
 16 that's coming to mind.
 17 Q. That's fair. Let me show you this document
 18 that's been marked Exhibit 203, and this is a
 19 list of scholarships that the university's
 20 administered that the university gave us, and
 21 I'd just like to talk with you a little bit
 22 about it. Going to the first page there, it
 23 talks about donor intent. Can you explain to
 24 me how donor intent plays into how the
 25 university administers a scholarship?

1 A. Yeah. I don't believe -- I'm not an expert on
2 this, but I can talk from my experience based
3 on -- because we have donors that kind of help
4 our scholarships as well. So donor intent
5 really is when a donor grants a certain amount
6 of money to the institution, does an endowment,
7 whatever it is, the Center for Advancement,
8 which is what's referring on this first page,
9 will ask the donor, well, what is the intention
10 for this money, and then the donor will
11 stipulate this is what the money is for.

12 Once the donor stipulates what that money
13 is for, the institution is bound to adhere to
14 that, and so if they say this money is only for
15 freshman students who are majoring in a STEM
16 field, then the money has to go to freshman
17 students majoring in a STEM field, so forth, so
18 on. So it sets the parameters for
19 distribution.

20 Q. So the university has a choice on the front
21 end. If you don't have a STEM program, for
22 instance, if you're a smaller school, didn't
23 have a STEM program you could say, well, we
24 won't accept the donation then because we
25 couldn't administer it in that way. But once

1 you've accepted it, you'll administer it
2 consistent with the donor's intent?

3 A. That is -- We're supposed to. I mean that is
4 the idea. I don't know -- I don't work for the
5 Center for Advancement. I can't answer what
6 happens, but I will tell you that that's the
7 intention of it, yes.

8 Q. Okay. Thank you. And what is the Center for
9 Advancement?

10 A. It used -- It's a foundation office, so the
11 name changed.

12 Q. Okay.

13 A. So it's essentially just where all the
14 donations and sponsorships get housed, so they
15 do our fundraising and so forth. Private
16 donors, corporate donors, what have you.

17 Q. Can you look at page 8700. It's a little
18 tricky. If you look in the bottom left-hand
19 corner or your right-hand corner right there --

20 MR. CARROLL: These numbers here
21 (indicating).

22 Q. It's partially cut off.

23 MR. CARROLL: I'll try to help. What
24 number?

25 MR. BLOMBERG: 8700. So it's going to be

1 00 and then 8700.

2 MR. CARROLL: It was pretty early.

3 MR. BLOMBERG: That's exactly right. Yes.

4 A. The second page.

5 Q. Oh, I didn't realize. That was really easy. I
6 made it harder than it had to be. And just
7 looking at it, so I can understand the donor
8 intent side, I think this has language, and you
9 just take a moment to look through it, but as
10 you're looking, it has language about the donor
11 intending this to be scholarship aid to needy
12 and deserving handicapped students. So just
13 let me know when you see that.

14 A. Yes, I see it.

15 Q. Okay. And then I think further down it talks
16 about how the fund is established for the
17 purpose of purchasing a van for handicapped
18 persons and to make the campus more accessible
19 to handicapped students, faculty, and visitors.

20 A. Yes, I see that.

21 Q. Okay. And so would that be an example of the
22 donor saying, you know, this is why I'm giving
23 you the money, and then the university is going
24 to administer it consistent with that intent?

25 A. That is my understanding, yes.

1 Q. And then when it says the selection is made by
2 the director of the Office of Services for
3 Persons with Disabilities, that's the
4 university department that's going to be
5 handling the awarding and the distribution of
6 the funds?

7 A. Where is that?

8 Q. It might be -- I think it's closer to the top.
9 It says the selection is made by the director
10 of, quote, "Office of Services for Persons with
11 Disabilities." I'm sorry, I only have one
12 copy.

13 A. Oh, here it is. Okay. Okay, I see it. I had
14 to read it over. What was your question again?

15 Q. So that's just telling us who within the
16 university is going to be making the award and
17 making those determinations?

18 A. Yes.

19 Q. Okay. Great. Could you turn two pages to
20 8702. And again, I apologize. It's tough to
21 read in that corner there, but this one talks
22 about how the funds are being used to enhance
23 services for students with learning
24 disabilities and attention deficit disorders.

25 A. Yes.

1 Q. And so this scholarship program here would be
2 administered with that intent in mind, and the
3 university is going to be administering it for
4 those kinds of students?

5 A. That is my understanding.

6 Q. And that would be kind of consistent with what
7 we were talking about earlier with the TRIO
8 program and students with verified
9 disabilities, this is an example of the
10 university assisting, you know, populations
11 that need more help?

12 A. Yes and no because the TRIO funds are not
13 institutional funds, they are all federal.
14 It's a grant but it's -- the grant is housed in
15 the university. The university owns the grant,
16 and so it's a partnership in that sense, but
17 the money is all federal.

18 Q. Gotcha. And then does the university have to
19 accept the TRIO funding or is it choosing to
20 to, you know, serve its student populations?

21 A. The university -- So in order for any TRIO
22 grant to exist, the university where it's
23 housed has to agree to the partnership, so the
24 university has to agree that the TRIO program
25 will sit there, and the university also has to

1 agree to some sort of in-kind service, whether
2 that be I'm going to give you space, which is
3 like an office building or office rooms, or I'm
4 going to provide you with access to fill in the
5 blank, right. So that's true for all kinds of
6 TRIO programs across the nation. So for your
7 question, which is very specific, does it have
8 to accept the funds?

9 Q. Yeah. What I'm trying to understand is, you
10 know, Uncle Sam is standing here with the TRIO
11 program; right? Does the University of Iowa
12 have to take it? You know, is Uncle Sam
13 pushing it on you, or are you choosing to
14 partner with Uncle Sam in that decision?

15 A. No, there is no forced partnership in the TRIO
16 program and the institution.

17 Q. Okay. So you're choosing to participate in the
18 program, but once you do choose to participate
19 in it, you have to administer it consistent
20 with federal guidelines.

21 A. With the federal guidelines, yes.

22 Q. Okay. That makes sense. And then are you
23 aware of other types of programs? We've looked
24 at a couple now. We talked about the TRIO
25 program that serves students with disabilities

1 that -- or target and assist those populations.

2 A. I'm aware of, yeah, student disability services
3 on campus. That's their sole purpose.

4 Q. Okay. And that wouldn't be inconsistent with
5 the mission of the university at all?

6 A. No.

7 Q. Could you turn to page 8734. It's a little bit
8 further in.

9 A. Okay.

10 Q. And this is a scholarship for the National
11 Education for Women's Leadership, and it states
12 it has the long-term goal of increasing women's
13 representation in all levels of government.

14 A. Okay.

15 Q. Do you see that language?

16 A. I do.

17 Q. So would this scholarship be administered in a
18 way that's consistent with that intent?

19 A. I am not familiar with this scholarship. This
20 is actually the first time I'm seeing it. So
21 is your question -- Can you rephrase your
22 question?

23 Q. Certainly, certainly. So looking at the
24 language there, describing the purpose of the
25 scholarship, would this scholarship be

1 administered consistent with the, quote,
2 "long-term goal of increasing women's
3 representation at all levels of government"?

4 A. Well, if that's the donor intent and the
5 university is supposed to adhere to the donor
6 intent, then the answer would then follow that,
7 yes, it is; but again, I'm not familiar with
8 this scholarship.

9 Q. With this specific one.

10 A. Yes, with this specific one.

11 Q. So it would be consistent with how your
12 understanding is of other types of scholarships
13 that are administered consistent with donor
14 intent, but you just haven't looked at this one
15 before.

16 A. That is correct.

17 Q. Okay. Can you look at the next page, please,
18 8735, and where it states that -- and I'll read
19 it but if you could find it. It says, "The
20 award will be presented to one member of the
21 Panhellenic Council Sorority Community who
22 embodies the leadership characteristics of a
23 quiet, yet contributing, member of her
24 chapter."

25 A. I see that.

1 Q. So is it your understanding, then, that this,
2 consistent with donor intent, would be for a
3 sorority member who meets the other criteria
4 that are mentioned here: Leadership
5 characteristics, quietly contributing?
6 A. Yes. Based on the donor intent, yes.
7 Q. Could you go to 8739. It's about four pages
8 back. And this is the Mary Peterson Sorority
9 Woman of the Year Fund. And it offers an
10 annual five-hundred-dollar award for one member
11 of the sorority community. Are you familiar
12 with this scholarship at all?
13 A. No.
14 Q. Do you have any reason to think that the
15 university isn't providing the Woman of the
16 Year award in the way that the donor intent
17 indicates here?
18 A. No.
19 Q. Okay. Can you turn to the next page, please.
20 And this is the award that honors one
21 fraternity man annually. Do you see that
22 language?
23 A. I do.
24 Q. And under the award criteria, it says "UI
25 Fraternity Man" as the first criteria?

1 A. I see that.
2 Q. And so would the university -- Consistent with
3 your understanding of other types of awards,
4 would the university award this scholarship
5 consistent with the donor's intent?
6 A. That would be my understanding.
7 Q. Okay. Can you turn to 8754, please. This one
8 might be a little trickier to find but it says,
9 "Applicants must" -- I think it may be the
10 second paragraph. "Demonstrate interest and
11 work toward promoting cultural awareness of" --
12 I apologize if I get this wrong -- "Chicano and
13 Latino populations." Did I mispronounce that?
14 A. Chicano.
15 Q. Chicano, thank you. "Toward promoting cultural
16 awareness of Chicano and Latino populations."
17 Do you understand what that means, what they're
18 trying to get at there?
19 A. It's vague. It is vague. It's vague language,
20 but I -- I think I understand what it means.
21 Q. And what would your understanding be?
22 A. My understanding is that whoever is eligible
23 for this particular scholarship is someone
24 who's working towards promoting information or
25 educating the wider community about Chicano and

1 Latino concerns, Chicano and Latino culture,
2 and just anything involved with that particular
3 population.
4 Q. Okay. And so while the university wouldn't
5 necessarily have any problem with this, this
6 scholarship wouldn't be, say, for somebody who
7 was working towards promoting cultural
8 awareness of African-American or Jewish
9 populations.
10 A. Not based on the donor intent.
11 Q. Okay. Can you turn to 8762, please. It's
12 about ten pages down. Eight, precisely. And
13 this is for the university Women's Water Polo
14 Club. Do you know, is it normal to have
15 scholarship programs or funds set up for
16 different sports teams on campus? Do you have
17 any familiarity with that?
18 A. I don't. I don't have familiarity with that.
19 Q. Okay. Do you know if the university would
20 check to see if the Women's Water Polo Club was
21 admitting men as well before it would award the
22 scholarship?
23 A. I don't know.
24 Q. Do you think the university would stop
25 providing funds if it came to its awareness

1 that the Women's Water Polo Club was not
2 accepting men?
3 A. I don't know.
4 Q. I don't think we'll need to go through all of
5 them, but I'm going to represent to you that on
6 pages 8769, 65, 70, and 78 -- or sorry, strike
7 78, just 70 -- there's the Men's Water Polo
8 Club, the Men's Rugby Club, and the Men's
9 Volleyball Club. Feel free to take a look.
10 A. Okay.
11 Q. And with all those, the same kind of basic
12 question: You don't have any awareness that
13 the university is going and asking, hey, Men's
14 Water Polo Club, are you letting women in
15 before the university administers this fund.
16 A. I don't know.
17 Q. Okay. And you don't know if the university
18 were to determine that the Men's Water Polo
19 Club was not, in fact, administering -- or
20 allowing women in, that would stop
21 administering this fund for them?
22 A. I don't know.
23 Q. Okay. At page 8778, this is a Chi Omega
24 Scholarship Fund, and it says that preference
25 will be given to a junior female student. Do

1 you see that language?

2 A. Yes.

3 Q. And so here, consistent with what we've been
4 talking about, your understanding is the
5 university is going to administer this fund,
6 this scholarship, consistent with the donor
7 intent that preference will be given to a
8 junior female?

9 A. That is my understanding.

10 Q. Okay. At 8780, just two pages, this is the
11 Melissa Ann Brendes Memorial Scholarship, and I
12 believe it says that the scholarship is
13 administered by the vice president of Student
14 Life Office. Does that sound correct to you or
15 do you know --

16 A. I'm not familiar with this scholarship.

17 Q. But no reason to think that that language is
18 incorrect about who administers it?

19 A. I don't have any reason to think it's
20 inaccurate, no.

21 Q. Okay. And it says the preference will be given
22 to a member of the Tau Chapter of Delta Gamma.
23 Do you see that language?

24 A. I do.

25 Q. Okay. And do you know if the Tau Chapter of

1 Delta Gamma is a sorority?

2 A. I am not Greek, and I know nothing about the
3 Greek system so I don't know.

4 Q. I didn't know either. I had to look it up, but
5 what I saw suggested that it is a sorority.

6 A. Okay.

7 Q. But if it was a sorority, and it said the
8 preference would be given to a member of the
9 Tau Chapter of Delta Gamma, that means
10 preference would be given to that sorority.

11 A. Okay.

12 Q. Consistent with the donor intent. Does that
13 sound right to you?

14 A. If it's consistent with the donor intent, yes.

15 Q. Okay. Which, you know, consistent with that
16 language on the page there in front of you.

17 A. Yes.

18 Q. Okay. And then just the very next page, the
19 Edith Williams Malone Scholarship. And do you
20 see where it says preference will be given to
21 female students who are members of Kappa Alpha
22 Theta sorority?

23 A. Yes.

24 Q. So your understanding is that this will be
25 administered consistent with that intent.

1 A. Yes.

2 Q. All right. I'd like to show you Exhibit 28.

3 Are you familiar with this scholarship?

4 A. No.

5 Q. Do you see on the first paragraph of the first
6 page where it says that preference is going to
7 be given to underrepresented minority
8 undergraduate students, African-American,
9 Latino, Latina, or American Indian heritage who
10 are active in the gay, lesbian, bisexual,
11 transgender community?

12 A. Yes.

13 Q. What is your understanding of what that means
14 for purposes of this scholarship?

15 A. Who are active in the community. So I'm
16 interpreting -- who contribute to the -- okay.
17 So I'm interpreting this to mean -- So my
18 understanding is any of the stated
19 underrepresented minority undergraduate
20 students who in some way may contribute to the
21 gay, lesbian, bisexual, and transgender
22 communities.

23 It may be through advocacy, it may be
24 through allyship, it may be through individual
25 membership, but it doesn't look like they're

1 talking about just identifying but somehow
2 maybe being active in the advocacy or the
3 allyship of this group. That would be my
4 interpretation of it.

5 Q. Okay. So then would it be consistent with your
6 understanding, then, that the preference is
7 going to be given to students from the minority
8 backgrounds listed who in some way are
9 supportive of the LGBT community?

10 A. Yes.

11 Q. Okay. And if you look on the second page,
12 please. Near the top it has some boxes to
13 check where it asks about gender identity and
14 racial and ethnic identity. Do you see those?

15 A. Yes.

16 Q. Why do you think those are included on the
17 application form?

18 A. I don't know. I would -- I may make an
19 educated guess that if there is a criteria for
20 the scholarship and that criteria has to do
21 with preference given to underrepresented
22 minority students who are active in the GLBT
23 community, then they may be trying to capture
24 if the applicant is, in fact, meeting the
25 intent of the scholarship.

1 Q. Okay. I'd like to show you -- we're done with
 2 that one now -- what's been marked Exhibit 29.
 3 It's titled the Rainbow Scholarship. Do you
 4 see that?
 5 A. Yes.
 6 Q. Do you see the first paragraph where it says,
 7 "This annual scholarship is intended for
 8 regularly enrolled University of Iowa" -- "for
 9 a regularly enrolled University of Iowa
 10 undergraduate student who is gay, lesbian,
 11 bisexual, or transgender"?
 12 A. Yes.
 13 Q. What would be your understanding of what that
 14 would mean for purposes of the scholarship?
 15 Feel free to take your time reading it.
 16 A. So my understanding would be this is a student
 17 who is a full-time, continuously enrolled UI
 18 undergrad who identifies as a member of the
 19 LGBT community and who is also low income.
 20 Q. Okay.
 21 A. And is in state, yeah.
 22 Q. So those would be the criteria for the award?
 23 A. Based on my understanding of what it's
 24 indicating, yes.
 25 Q. Okay. Could you turn to the second page,

1 please, where it has the application, and do
 2 you see where it says it's awarded by the
 3 university Office of Student Financial Aid?
 4 A. On the -- Yes.
 5 Q. Do you have any reason to think that's
 6 incorrect?
 7 A. No.
 8 Q. And then if you look further down the page, it
 9 has that kind of check box where it says, I
 10 think, confirm or affirm, all those criteria
 11 you were talking about earlier, including that
 12 the individual identifies as lesbian, gay,
 13 bisexual, or transgender.
 14 A. Yes.
 15 Q. So that would be as part of the application,
 16 the applicant would have to check that box to
 17 be eligible?
 18 A. The applicant would have to check the box to
 19 indicate that they are meeting whatever the
 20 criteria is for this particular scholarship.
 21 Q. Okay, great. Thank you. Just one more
 22 scholarship question. Are you familiar with
 23 the U.S. Armed Forces Services Award?
 24 A. Not off the top of my head. It sounds like it
 25 may be -- Is it coming from the Military and

1 Veterans Student Services Office?
 2 Q. You know what, I'm not certain. Let me take a
 3 quick look.
 4 A. Okay.
 5 Q. What I see the description as saying, it says
 6 U.S. Armed Forces Award, and it says, "Military
 7 veterans with M.B.A.s bring valuable skills to
 8 the classroom and to their post M.B.A.
 9 employer. Leadership, reliability,
 10 productivity, and an understanding of a diverse
 11 teams." It says, "We are dedicated to
 12 supporting veterans and active-duty members of
 13 the U.S. military through financial awards that
 14 augment post 9/11 GI Bill and Yellow Ribbon
 15 Program benefits."
 16 And it appears the program is awarded to
 17 graduate students through the Military and
 18 Veteran Student Services program. Does that
 19 sound at all familiar to you?
 20 A. Now, interestingly enough, Military and Veteran
 21 Student Services is one of the departments in
 22 my center, in part of the Center for Diversity,
 23 but that particular award I've never heard of.
 24 Q. Okay.
 25 A. And we don't work with graduate students

1 formally, so this is news to me.
 2 Q. Okay. I spoke over you there.
 3 A. That's okay.
 4 Q. You said it was news to you, and I said that
 5 might explain it because you work with
 6 undergrad, and this would be a graduate
 7 program?
 8 A. That is a graduate program.
 9 Q. But if you were to look on the university's
 10 website where it says diversity.UIowa.edu/
 11 awards/armedforcesaward, you wouldn't have any
 12 reason to think that wasn't an award that
 13 students could apply for at the university.
 14 A. Well, so that's not -- so I'm going to say this
 15 because this is what's going on. Our website
 16 is not necessarily up to date.
 17 Q. Okay.
 18 A. And so there are things on there that are not
 19 currently accurate. So for that particular
 20 question I'm going to say I don't know.
 21 Q. Okay.
 22 A. Because I've never heard of that scholarship to
 23 begin with and then, you know, if we were
 24 awarding it, I would think that I would know
 25 that we were awarding it.

1 Q. Gotcha. Would there be any way to confirm that
2 this U.S. Armed Forces Award is, in fact,
3 something that the university does or doesn't
4 offer?

5 A. Sure, yes.

6 Q. How would one do that?

7 A. I would say through the director of the
8 Military Veteran Student Services Program or
9 through the university's registrar's office,
10 the GI billing portion of it.

11 Q. Okay.

12 A. Yeah.

13 Q. And if the requirement was that a person be
14 either a veteran or active duty U.S. military,
15 then that would probably be -- you wouldn't
16 have any reason to think that would be
17 inconsistent with how the award would be
18 administered.

19 A. No.

20 Q. Okay. Those are my scholarship questions. I
21 want to ask you a couple questions about the
22 university sports team. Or teams, plural,
23 because there's more than one. Do you know if
24 the university has a men's football team?

25 A. Yes. And I'm not --

1 MR. CARROLL: She's -- Excuse me. This
2 witness is here to talk about scholarships, not
3 other matters.

4 MR. BLOMBERG: So she was designated by
5 you to speak about University of Iowa programs
6 that have existed since 1997 including, but not
7 limited to, scholarships, awards, events,
8 mission policies, and educational programs. So
9 you did not limit her ability to testify on
10 that issue.

11 MR. CARROLL: Well, I'm limiting it now
12 because her expertise for the University of
13 Iowa is scholarships.

14 MR. BLOMBERG: Okay. Who are you going to
15 designate to speak on this issue then?

16 MR. CARROLL: What? The sports teams?

17 MR. BLOMBERG: Yes.

18 MR. CARROLL: It's so patently obvious.
19 We have men's and women's sports teams. What
20 do you want? Do you want the University of
21 Iowa to file a -- You file a request for
22 admission. And I'll answer it.

23 MR. BLOMBERG: All right. Well, let me
24 ask my questions. Feel free to not answer them
25 if you don't know the answers to them and then

1 we can follow back up. Does that work for you?

2 MR. CARROLL: Yeah. And if it's not
3 admissions policy or in your office, don't
4 answer on behalf of the University of Iowa.

5 THE WITNESS: Sure.

6 MR. CARROLL: It's not as simple as
7 Plaintiff's counsel thinks Title IX is.

8 Q. Are you familiar with the university's -- that
9 the university has a men's football team?

10 A. I'm not going to answer.

11 Q. Okay. Do you know if any female students have
12 ever been selected to play on the men's
13 football team?

14 A. I don't know.

15 Q. Do you know if they're eligible to play on the
16 men's football team?

17 A. I don't know.

18 Q. Okay. Do you know if any female students would
19 be eligible to play on the men's wrestling
20 team?

21 A. I don't know.

22 Q. Their golf team?

23 A. I don't know.

24 Q. Their tennis team?

25 A. I don't know.

1 Q. Okay. Do you know if the university has any
2 female sports teams?

3 A. I don't know.

4 Q. You don't know or you're not going to answer?

5 A. I'm not going to answer. That's probably
6 more --

7 Q. I would guess that you might know.

8 A. -- appropriate.

9 Q. And do you know if all of the sports teams that
10 the university has are NCAA sanctioned?

11 A. I really don't know.

12 Q. Do you know if the university holds sports
13 camps for kids in the summer?

14 A. I will not answer that question.

15 Q. All right. And are you familiar with the boys
16 and girls basketball summer camps run by the
17 university?

18 A. I won't answer that question.

19 MR. BLOMBERG: All right. Then we'll
20 follow back up with your counsel about that. I
21 think we'll take a short break, and we'll go
22 from there.

23 MR. CARROLL: Yeah, so we'll step out.

24 (A brief recess was taken.)

25 Q. Miss Petty, could you please tell me about the

1 Women's Resource and Action Center.

2 A. It is an organization on campus that is geared
3 towards providing support for students on
4 campus. I don't know much about it. It's not
5 under my purview.

6 Q. Okay. What significance, if any, is there that
7 it is the Women's Resource Center instead of
8 the Student Resource Center?

9 A. None, because right on the door it says
10 "all" -- "all genders welcome." That's etched
11 right on the door. I know that the director of
12 that program has a very vocal and visible
13 policy about accepting everyone regardless of
14 their gender identity.

15 Q. Is it at all a part of what we were discussing
16 earlier about an attempt to maybe reach out to
17 underrepresented populations or vulnerable
18 populations by making the university attractive
19 in different ways? You mentioned earlier some
20 of the tuition programs and the scholarship
21 programs. Do you have any knowledge whether
22 this center is reflective of the university's
23 attempt to reach out to, you know, minority or
24 underrepresented communities?

25 A. For recruiting?

1 Q. Or other purposes. Or other purposes.

2 THE WITNESS: Should I answer?

3 MR. CARROLL: If you know.

4 A. So it's not the university's -- it's not there
5 to necessarily reach out to -- in this case it
6 would be for the women -- So it initially
7 started focused on women. It's changed its
8 scope over time and over the years. The point
9 of it really is to provide a space for any
10 student who has experienced certain types of
11 biases or challenges on campus if those biases
12 or challenges are based on gender identity, and
13 so we actually have men who are using the space
14 as well, so no one is ever turned away when
15 they come in.

16 So the first part of your question I would
17 say I don't know because I don't know what, you
18 know, the university's intention is at this
19 point, right. It's not -- because it's not
20 specific to women. It's certainly not for
21 recruiting. It really is just to provide a
22 support on campus for students.

23 Q. Okay. And how was that distinct and how is the
24 mission of that center distinct from the
25 Afro-American Cultural Center?

1 A. The cultural centers are also there to provide
2 support but it's -- the cultural center is more
3 of a space, it's a house, whereas WRAC is
4 providing actual services to students, and so
5 I'll give you the difference of the cultural
6 center. For example, sometimes faculty will
7 have classes in the cultural center. Sometimes
8 there are different student organizations or
9 various organizations using the space to host
10 events.

11 It is not meant for any one particular
12 thing, if that makes sense. The Afro House is
13 not just meant for black or African-American
14 students. We have all kinds of students using
15 the space for all kinds of different
16 multicultural and intercultural events.

17 Q. You mentioned where the WRAC, the Women's
18 Center, that it kind of started focused on
19 women, but that purpose has changed over time?

20 A. It shifted.

21 Q. Is that what's happened with the Afro center
22 and, you know, it started with that focus? I'm
23 just trying to understand the name. And what
24 the purpose is there.

25 A. Yeah, so I -- I can't speak to that. I wasn't

1 here. The Afro House has been in existence
2 probably since the '60s; way before, you know,
3 I was even born. I'm going to say that. So I
4 don't know. So to answer your question, I
5 don't know specifically.

6 Q. So while you have some familiarity of the
7 transition that's taken place at the Women's
8 Center, you don't have any familiarity with the
9 Afro-American Center?

10 A. Not specifically. I can only make assumptions,
11 just kind of intelligent assumptions, but I
12 don't want to do that in a deposition, so I
13 don't actually have the facts.

14 Q. Okay, that's fine. So there's the Women's
15 Center and then the Afro-American Center. Can
16 you tell me how those two centers are different
17 from Latino-Native American Cultural Center?

18 A. The African-American Center, the Latino -- what
19 we call the L-Nat, Latino-Native American
20 Cultural Center, and then you mentioned --

21 Q. There's the Women's, the African-American, and
22 then the Latino-Native American Cultural
23 Center.

24 A. Okay. So the last two centers are centers that
25 are -- they're cultural centers for students

1 that are -- again, they're spaces, they're
2 houses; right? And so they're manned by
3 graduate students, so graduate students are
4 there part-time just to sort of watch over the
5 space as students come and go, as events are
6 occurring. Again, you can go there for events,
7 students go there to study. It's sort of just
8 like a multipurpose-use space.

9 The use of those spaces are currently
10 undergoing some transition as the Student Life
11 department is looking to try to make it more
12 vibrant and to try to get word out across
13 campus that, hey, we have these houses. Feel
14 free to use them and, you know, reserve them
15 and teach your courses here and, you know,
16 tutoring sessions here and so forth and so on.

17 The WRAC is, again, a -- it's run by a
18 director. It's professional staff, there's
19 staff that are trained to work with the
20 students who are either undergoing, you know,
21 challenges or have been, you know, targeted
22 because of gender issues. There's also events
23 that the WRAC will sponsor.

24 Q. What kind of events?

25 A. The most recent one was a -- it was a

1 networking lunch. So they'll do opportunities
2 for staff to come together and get to know each
3 other over lunch, you know. Just a
4 conversation lunch. They've done network --
5 I've never attended any of them so I can't
6 speak specifically on them, but I'm just trying
7 to remember things I've seen in my email and
8 fliers. So just opportunities for faculty and
9 staff and students to get together where
10 opportunities may not be there normally.

11 Q. And when you say the Afro-American Center and
12 the Latino Native American Center are houses,
13 you don't mean that in a term in sense of like
14 a home, a residence that people are living in?

15 A. People are not living in them. They're just
16 physical houses that the university has
17 purchased.

18 Q. Gotcha. And then using for the purpose that
19 you mentioned?

20 A. Yes.

21 Q. As a space that they can hold classes in and do
22 tutoring and things like that?

23 A. Yes.

24 Q. Does the university have any other centers or
25 houses other than the three we've discussed?

1 A. The Asian -- and I may have this name
2 incorrect -- the Asian-American Pacific
3 Islander House, and so it's similar, similar in
4 purpose, similar in scope. It's a house that
5 students use for various things and, you know,
6 faculty can use, staff can use for various
7 events and so forth.

8 Q. Do you have any familiarity with why -- You
9 have three different centers of three different
10 kind of nationalities or ethnic backgrounds
11 with those names, but from the way you
12 describe, it seems like they're pretty
13 interchangeable. Is there any reason for that?

14 A. Yes. So what I know is that the
15 interchangeability is part of a shift that's
16 occurred in recent years. I don't know when
17 that shift has -- began. I just know that
18 there was a revisioning of what those cultural
19 houses were going to be. I think at one
20 time -- I think, I know, based on conversations
21 with higher-ups who are over that space that
22 the spaces were not being used. They were just
23 kind of sitting there.

24 At one point they were dilapidated, kind
25 of falling apart. There was a student push to

1 try to renovate because it was supposed to be
2 student space and, you know, they were like
3 we're walking in there and the toilets don't
4 flush and there's problems, and so higher-ups
5 said, yeah, you're absolutely correct. We need
6 to make this better. Let's fix it.

7 So there was this overall push to not only
8 revamp the cultural houses but then as you were
9 doing that, let's revamp the mission of them,
10 let's revamp what we're using them for and get
11 the word out that, hey, these houses are here,
12 because it just sort of fell off campus, if
13 that makes sense. People just stopped. It's
14 like it wasn't even there.

15 So some of the initiatives also were
16 trying to get the bus routes, the campus bus
17 routes, to stop at the cultural houses because
18 in the past you had to walk quite a distance to
19 get to them, which was problematic and also
20 unsafe.

21 Q. Okay. Yeah.

22 A. Yeah.

23 Q. Are there any other centers beyond, I guess,
24 the four we've talked about now?

25 A. No, I believe I've covered them all.

NADINE C. PETTY

9-20-18

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1 Q. Okay. I seem to recall there's some sort of --
 2 maybe it's not a center but like an LGBT center
 3 or house?
 4 A. Resource.
 5 Q. Resource. How would that be distinct from
 6 these other entities we talked about?
 7 A. It is -- I know it's not considered a cultural
 8 center. They call it a resource center, and so
 9 my understanding of the LGBTQ Resource Center
 10 is it provides resources for campus.
 11 Q. Is it more like the Women's Resource Center in
 12 that respect? It's less a house and more of a
 13 place where people can come and receive
 14 services and support?
 15 A. That I don't know.
 16 Q. Okay. Are you familiar with the types of
 17 services they provide?
 18 A. I am not.
 19 Q. Okay. Anything about the types of activities
 20 that take place there?
 21 A. It's very similar to the Afro House and the
 22 L-Nat and the Asian-American Pacific House in
 23 that it's open for anyone who wants to use the
 24 space. Again, I've seen events housed there.
 25 I know that students also use the space for

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1 studying or, you know, breaks between classes
 2 as well. I'm not as well versed in what occurs
 3 in the -- in that particular resource center.
 4 MR. BLOMBERG: Okay. I have no further
 5 questions.
 6 MR. CARROLL: Okay, thank you.
 7 (Deposition concluded at 2:17 p.m.)
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CERTIFICATE

1 I, the undersigned, a Certified Shorthand
 2 Reporter of the State of Iowa, do hereby
 3 certify that there came before me at the date,
 4 time and place hereinbefore indicated, the
 5 witness named on the caption sheet hereof, who
 6 was by me duly sworn to testify to the truth of
 7 said witness's knowledge touching and
 8 concerning the matters in controversy in this
 9 cause; that the witness was thereupon examined
 10 under oath, the examination taken down by me in
 11 shorthand, and later reduced to computer-aided
 12 transcription under my supervision and
 13 direction, and that the deposition is a true
 14 record of the testimony given and of all
 15 objections interposed.

16 I further certify that I am neither
 17 attorney or counsel for, nor related to or
 18 employed by any of the parties to the action in
 19 which this deposition is taken, and further that
 20 I am not a relative or employee of any attorney
 21 or counsel employed by the parties hereto, or
 22 financially interested in the action.

23 Review of the transcript was not requested
 24 by the witness or any party.

25 Dated at Cedar Rapids, Iowa, this 27th day
 of September, 2018.

Julie M. Kluber
 Certified Shorthand Reporter

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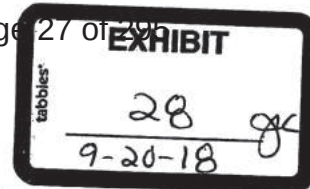
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THE ROBERT D. DOCKENDORFF SCHOLARSHIP

The Robert D. Dockendorff Scholarship is to be used to support one or more annual scholarships for University of Iowa students with preference given to underrepresented minority undergraduate students (African American, Latino/a, or American Indian heritage) who are active in the Gay, Lesbian, Bisexual, Transgender community, who contribute to the diversity of the University campus, and who demonstrate financial need. One or more awards may be granted for the 2016-2017 academic year.

BIOGRAPHY

Robert D. Dockendorff graduated from The University of Iowa in 1960 with a B.A. in Sociology. He is a native of Danville, Iowa, and his family still owns a farm there. Mr. Dockendorff has lived in San Francisco for many years and worked for the Pacific Maritime Association there for 35 years prior to his retirement. Mr. Dockendorff's interest in student aid stems from his belief that education is the key to solving the country's problems. Through the years, he has been very involved with the San Francisco schools and also served many years on the Ethics Committee for the city of San Francisco.

ELIGIBILITY

1. Students who are active participants in the Gay, Lesbian, Bisexual, Transgender community.
2. Students who contribute to the diversity of The University of Iowa campus.
3. Students who demonstrate financial need.
4. Students must be in good academic standing (have a minimum 2.0 cumulative GPA on a 4.0 scale).
5. Both undergraduate and graduate students may apply; however, preference will be given to undergraduates.
6. All students who meet the above criteria may apply; however, preference will be given to underrepresented minority undergraduate students (African-American, Latino/a, or American Indian heritage.)

TO APPLY

1. Complete and sign the application form available online at <http://lgbtqsf.org.uiowa.edu/>. This form is also your release of information authorizing the Office of Student Financial Aid to give the committee the required financial need information.
2. Write an essay no longer than 1,000 words, typed, double-spaced on an 8.5 x 11 sheet of paper or electronically, telling us about your participation in the LGBT community; your contribution to the diversity of The University of Iowa campus; and your educational and career goals.
3. Attach your most recent financial aid award notification, printable from ISIS.
4. Attach a copy of your grade report, printable from ISIS.

SELECTION

Recipients shall be determined by a selection committee made up of members of the Lesbian, Gay, Bisexual and Transgender Staff and Faculty Association in coordination with the Office of Student Financial Aid. Applicants selected will be notified via mail or email by November 30, 2016.

Students applying for the Dockendorff Scholarship will also be considered for the Rainbow Scholarship if they meet eligibility criteria. Information about this and other award opportunities specific to LGBTQ students can be found on the LGBTQ SFA webpage. <https://lgbtqsf.org.uiowa.edu/>

DEADLINE

All materials (application form, grade report, financial aid award notification and essay) must be submitted electronically or postmarked for submission to the address on the application no later than November 5, 2016.

D 000260

The Robert D. Dockendorff Scholarship Application Form 2016-17

Personal Information

Name:

University ID:

Permanent Address:

Phone:

Email address:

Number of dependents:

Gender Identity:

Racial/Ethnic Identity:

Educational Background

List the names and dates of all colleges, universities, or training programs you have attended:

Institution	City/State	Dates (month/year to month/year)	Degrees/Credits Earned

I am currently a/an (circle one): Undergraduate student Graduate/Professional student

When do you expect to graduate?

What is your major or primary area of study?

Release of information

My signature below authorizes The University of Iowa Office of Student Financial Aid to furnish information related to my financial aid file to the Dockendorff Scholarship Committee for the purpose of evaluating my qualifications for the scholarship.

Signature _____

Date _____

Please also attach your financial aid award summary and grade report (both printable from ISIS) as well as your 1,000 word essay statement about your LGBT community involvement, contribution to diversity on the UI campus and academic and career goals.

SUBMIT TO:

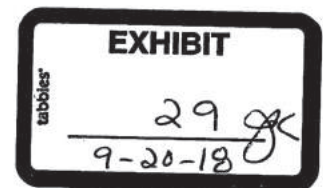
Robert D. Dockendorff Scholarship Committee
 c/o Autumn Tallman
 International Programs
 1111 University Capitol Centre
 Iowa City, IA 52242
 319-335-0353
autumn-tallman@uiowa.edu

D 000270

The Rainbow Scholarship 2016-17

The Rainbow Scholarship is coordinated by the UI LGBTQ Staff and Faculty Association and is awarded by the UI Office of Student Financial Aid. This annual scholarship is intended for a regularly enrolled University of Iowa undergraduate student who is gay, lesbian, bisexual or transgender; who demonstrates financial need; and who graduated from an Iowa high school.

And application for the Rainbow Scholarship, plus details about this and other award opportunities specific to LGBTQ students, can be found on the LGBTQ SFA webpage: <https://lgbtqsf.org.uiowa.edu/>



D 000271

Rainbow Scholarship Application 2016-17

University of Iowa

The Rainbow Scholarship is coordinated by the UI LGBTQ Staff and Faculty Association and is awarded by the UI Office of Student Financial Aid. This annual scholarship is intended for a regularly enrolled University of Iowa undergraduate student who is gay, lesbian, bisexual or transgender; who demonstrates financial need; and who graduated from an Iowa high school.

For each applicant, financial need will be assessed by the UI Office for Student Financial Aid.

Name: _____ Student ID#: _____

E-mail address: _____ Phone number: _____

Name of High School: _____ High School Graduation Date (MM/YY): _____

Location of High School (Street Address/City/State/Zip): _____

Anticipated University of Iowa Graduation Date: _____

☐ I confirm that I am currently enrolled as a degree-seeking undergraduate University of Iowa student who graduated from an Iowa high school; I identify as lesbian, gay, bisexual or transgender; I have demonstrated financial need and I wish to be considered for a Rainbow Scholarship by the UI Office of Student Financial Aid.

Student's signature

Date

Applications must be submitted by 5 p.m. on **October 28, 2016**. Direct applications to the attention of **Cathy Wilcox, Director of Operations, UI Office of Student Financial Aid, 208 Calvin Hall, Iowa City, IA 52242**.

D 000377

The University of Iowa Center for Advancement - Donor Intent Document

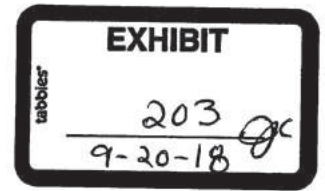
30014000 - Vice President for Student Life Development Fund

Account Name: Vice President for Student Life Development Fund
Account Number: 30-014-000

Date Revised: 5/10/12
Revision Source: Department Request
Endowment Type: Non-endowed

Intent:
Official name of the VP for Student Services division was changed to VP for Student Life. Name of the account has been updated to reflect that change.

Date Established: 7/27/2001
Established By: UI Department
Endowment Type: Non-endowed
Original Donor Intent (include date and description of restrictions and use):
The fund is to provide unrestricted support for the Vice President for Student Services



Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014000 - Vice President for Student Life Development Fund

Run Time: 4:37:00 PM

RI inC DEF 008600

The University of Iowa Center for Advancement - Donor Intent Document

30014001 - Handicapped Projects Program Fund

Date Revised: 7/5/1990
Revision Source: Correspondence
Endowment Type: Quasi-endowment

Intent:

Per letter authorization was given to invest \$10,000 as an endowment, with all payouts invested back to increase the endowment until such time as the endowment is of sufficient size to fully support the scholarships.

Account coded as a quasi-endowment. Endowment status to change to a permanent endowment when the account is of sufficient size to fully support the scholarships.

Date Revised: 1980
Revision Source: Correspondence
Endowment Type: Non-endowed

Intent:

Funds could be used for scholarship aid to needy and deserving handicapped student(s) enrolled in a University of Iowa graduate program or professional college. Actual selection of the scholarship(s) will be administered through a selection committee chaired by the director of the Office of Services for Persons with Disabilities.

Date Established: 9/29/1976
Established By: Donors
Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):
Fund established with the purpose of purchasing a van for handicapped persons and to make the campus more accessible to handicapped students, faculty and visitors.

The University of Iowa Center for Advancement - Donor Intent Document

30014002 - Student Disability Services Office Development Fund

Account Name: Student Disability Services Office Development Fund

Account Number: 30-014-002

Date Established: 12/23/1994

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The fund is to provide unrestricted support for the director of the Office of Student Disability Services for program support.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014002 - Student Disability Services Office Development Fund

Run Time: 4:37:00 PM

BLIND DEE 008701

The University of Iowa Center for Advancement - Donor Intent Document

30014003 - Learning Disability Assistant Fund

Account Name: Learning Disability Assistant Fund
Account Number: 30-014-003

Date Established: 5/21/1998

Established By: Donor

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Funds are to be used to provide salary support over three years for a program assistant to enhance the services for students with learning disabilities and attention deficit disorders.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014003 - Learning Disability Assistant Fund

Run Time: 4:37:00 PM

RI inC DEF 008702

The University of Iowa Center for Advancement - Donor Intent Document

30014005 - UI Student Senate Self-Help Scholarship

Date Revised: 1/27/2016

Revision Source: Donor

Endowment Type: Permanent endowment

Intent:

Funds changed to non-endowed per donor. New account #30-014-060.

Date Revised: 4/4/1984

Revision Source: Correspondence

Endowment Type: Permanent endowment

Intent:

Name of fund changed to UI Student Senate Self-Help Scholarship per department request.

Date Established: 11/17/1961

Established By: UI Department

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):

This fund was initially established by the UI Student Senate for Project AID, a group that raised funds for scholarships for needy students. This shall be a permanent endowment fund and principal shall not be invaded. Whenever principal exceeds \$15,000, the total amount annually made available for scholarships is not to exceed the amount of interest accruing in fund. When the principal is less than \$15,000, the Executive Council may elect to distribute the interest accruing in the fund, or \$400, whichever is greater, as long as \$400 will not invade the principal.

Donor Intent Document

30014005 - UI Student Senate Self-Help Scholarship

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

BLIND DEE 008703

Date Revised: 1/20/2016
Revision Source: Donor
Endowment Type: Non-endowed

Intent:
Endowment status changed to non-endowed per donor request. Old number 30-014-005.

Date Revised: 4/4/1984
Revision Source: Correspondence
Endowment Type: Permanent endowment

Intent:
Name of fund changed to UI Student Senate Self-Help Scholarship per department request.

Date Established: 11/17/1961
Established By: UI Department
Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):
This fund was initially established by the UI Student Senate for Project AID, a group that raised funds for scholarships for needy students. This shall be a permanent endowment fund and principal shall not be invaded. Whenever principal exceeds \$15,000, the total amount annually made available for scholarships is not to exceed the amount of interest accruing in fund. When the principal is less than \$15,000, the Executive Council may elect to distribute the interest accruing in the fund, or \$400, whichever is greater, as long as \$400 will not invade the principal.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014005 - UI Student Senate Self-Help Scholarship

Run Time: 4:37:00 PM
PL inC DEF 008704

The University of Iowa Center for Advancement - Donor Intent Document

30014006 - Women's Resource and Action Center Fund

Account Name: Women's Resource and Action Center Fund

Account Number: 30-014-006

Date Established: 10/1974

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The fund is to provide unrestricted support for the Women's Resource and Action Center (WRAC).

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014006 - Women's Resource and Action Center Fund

Run Time: 4:37:00 PM

BLIND DEE 008705

The University of Iowa Center for Advancement - Donor Intent Document

30014007 - Keyhole Development Fund

Account Name: Keyhole Development Fund

Account Number: 30-014-007

Date Revised: 10/18/1999

Revised by: UI Department

Endowment Type: Non-endowed

Intent:

A portion of the annual earnings from the Carver Scholarship for Disadvantaged Students Fund (30-120-003) are transferred to this account to be used to aid in the retention, inclusion, and success of Support Service Program students. Funds to be allocated for programs and activities associated with inclusion into the campus culture and identity, utilization of university-wide services, and projects that foster the pursuit of academic excellence.

Guidelines:

Programs: Funding for programs presented to students. These programs may be co-sponsored with other University-affiliated areas. The emphasis of these programs will be on providing information and skills to students, such as workshops on career planning or interpersonal relationships. Costs involved will typically include refreshment needs, transportation needs, publicity, as well as possible speaker/leader expenses.

Activities: Funding for activities in which students will participate. These activities may be co-sponsored with other University-affiliated areas. The emphasis of these activities will be on the inclusion of students into the campus culture and to promote an identity within the campus. Examples would include movie nights, pizza parties, and attendance at live performances such as cultural and sporting events on campus. Costs will typically include refreshment needs, prizes, and tickets to events, transportation needs, and publicity.

University-affiliated services and programs: Funding to students who have established a working relationship with Support Service Programs. The emphasis will be on providing funding for services that are educationally related, such as the Bridging the Gap Pre-Law conference registration fee.

Annual Support Service Programs and co-sponsored activities: Funding for community-building and educational activities and programs, such as opening-of-classes events, the Cultural Diversity Festival, the Harvest Festival, and the Multicultural Graduation and Recognition Banquet. Funding also could be used for promotional materials for visibility and identity purposes at University events for students and staff; for example, brochures, signs, or shirts.

Staff development: Funding for staff development including student staff such as undergraduate peer assistants, in an effort to enhance the quality of services provided to students. A wide variety of training programs are available and will be considered on an as-needed basis. Emphasis will be given to those programs offered by UI Staff Development. Professional membership fees will not be funded.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014007 - Keyhole Development Fund

Run Time: 4:37:00 PM
BINC DEF 008706

Date Established: 1977

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Fund initially established to receive gift and miscellaneous income to the Celebrate Life Program; Miscellaneous income will include performance receipts and advertising income.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014007 - Keyhole Development Fund

Run Time: 4:37:00 PM

BLIND DEE 008707

The University of Iowa Center for Advancement - Donor Intent Document

30014008 - Afro-American Cultural Center Student Fund

Account Name: Afro-American Cultural Center Student Fund
Account Number: 30-014-008

Date Established: 5/19/1978

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Funds are to support the cultural, educational and recreational activities sponsored by the Afro-American Cultural Center.

Donor Intent Document

30014008 - Afro-American Cultural Center Student Fund

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

RI inC DEE 008708

The University of Iowa Center for Advancement - Donor Intent Document

30014009 - Voices of Soul

Account Name: Voices of Soul

Account Number: 30-014-009

Date Established: 11/13/1978

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Funds are to be used for activities and programs of the Voices of Soul.

Donor Intent Document

30014009 - Voices of Soul

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

BLIND DEE 008700

The University of Iowa Center for Advancement - Donor Intent Document

30014013 - Scottish Highlanders Support Fund

Account Name: Scottish Highlander Support Fund

Account Number: 30-014-013

Date Established: 11/20/1981

Established By: Donor

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):
Established to receive gift support of regular Scottish Highlanders operations.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014013 - Scottish Highlanders Support Fund

Run Time: 4:37:00 PM

RI inC DEE 008710

The University of Iowa Center for Advancement - Donor Intent Document

30014014 - Scottish Highlanders Uniform Fund

Account Name: Scottish Highlanders Uniform Fund

Account Number: 30-014-014

Date Established: 2/29/1988

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

To deposit funds received for new uniforms for the Scottish Highlanders.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014014 - Scottish Highlanders Uniform Fund

Run Time: 4:37:00 PM

BLIND DEE 008711

The University of Iowa Center for Advancement - Donor Intent Document

30014015 - Scottish Highlanders Scholarship Fund

Account Name: Scottish Highlanders Scholarship Fund
Account Number: 30-014-015

Date Established: 2/29/1988

Established By: Donors

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Account established to accept gifts for support of scholarships for the
Scottish Highlanders.

Donor Intent Document

30014015 - Scottish Highlanders Scholarship Fund

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

RI inC DEE 008712

The University of Iowa Center for Advancement - Donor Intent Document

30014016 - Latino Native American Cultural Center

Account Name: Latino Native American Cultural Center
Account Number: 30-014-016

Date Revised: 4/2003
Revision Source: Description of Account
Endowment Type: Non-endowed

Intent:
The account name was changed from Chicano/Native American Cultural Center to Latino Native American Cultural Center.

Date Revised: 10/1992
Revision Source: Description of Account
Endowment Type: Non-endowed

Intent:
The account name was changed from Chicano/Indian Cultural Center to Chicano/Native American Cultural Center.

Date Established: 9/23/1991
Established By: UI Department
Endowment Type: Non-endowed
Original Donor Intent (include date and description of restrictions and use):
The fund is to provide unrestricted support for the Director of Campus Programs/Student Activities for program support.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014016 - Latino Native American Cultural Center

Run Time: 4:37:00 PM

BLIND DEE 008712

The University of Iowa Center for Advancement - Donor Intent Document

30014017 - University Lecture Committee Fund

Account Name: University Lecture Committee Fund

Account Number: 30-014-017

Date Established: 10/18/1991

Established By: UI Department

Endowment Type: Quasi-endowment

Original Donor Intent (include date and description of restrictions and use):

Funds are to be used to enhance the University Lecture Series. These funds will supplement the funds provided by mandatory student fees.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014017 - University Lecture Committee Fund

Run Time: 4:37:00 PM

BLIND DEE 002714

The University of Iowa Center for Advancement - Donor Intent Document

30014019 - Friends of KRUI Gift Fund

Account Name: Friends of KRUI Gift Fund

Account Number: 30-014-019

Date Established: 3/4/1994

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Gift funds will be used for general support of KRUI, primarily for equipment and operational needs and special projects.

Donor Intent Document

30014019 - Friends of KRUI Gift Fund

Run By: UIFoundation\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

RI in C DEF 008715

The University of Iowa Center for Advancement - Donor Intent Document

30014020 - Women's Resource and Action Center Gift In Kind

Account Name: Women's Resource and Action Center Gift In Kind

Account Number: 30-014-020

Date Established: 4/15/1994

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The purpose of this fund is to record gifts-in-kind (non-cash, non-stock, ie: books, artwork, computers, equipment, services, etc.).

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014020 - Women's Resource and Action Center Gift In Kind

Run Time: 4:37:00 PM

RI inC DEE 008716

The University of Iowa Center for Advancement - Donor Intent Document

30014021 - George L. Droll Residence Hall Student Award

Account Name: George L. Droll Residence Hall Student Award

Account Number: 30-014-021

Date Established: 11/18/1994

Established By: UI

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):

Funds are to be used for student scholarship award support. Awards will be made to students residing in the residence halls. Awards should go to a student (perhaps in his or her junior year) who had financial need and who had been active in residence hall activities and governance.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014021 - George L. Droll Residence Hall Student Award

Run Time: 4:37:00 PM

BLIND DEE 008717

The University of Iowa Center for Advancement - Donor Intent Document

30014022 - Friends of KRUI Sports Account

Date Revised: 4/27/2016

Revision Source: UI Department

Endowment Type: Non-endowed

Intent:

Account closed per request on final PAF.

Date Established: 12/15/1994

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Gift funds to be used to support the activities related to KRUI sports, such as travel to road and tournament games.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014022 - Friends of KRUI Sports Account

Run Time: 4:37:00 PM

PL inC DEF 008718

The University of Iowa Center for Advancement - Donor Intent Document

30014023 - UI Dance Marathon Fund

Revised Date: 7/16/2018

Revised Source: UI Center for Advancement

Endowment Type: Non-endowed

Intent:

The donor intent remain the same.

Date Established: 2/1/1995

Established By: UI Foundation

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Gift funds (net of fund-raising expenses) are to be used to support UI projects selected by the Dance Marathon organization. This will include, but may not be limited to, support of the UIHC Pediatric Oncology Unit in the following areas: research, children's materials, equipment, and financial support.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014023 - UI Dance Marathon Fund

Run Time: 4:37:00 PM

RI inC DEF 008710

The University of Iowa Center for Advancement - Donor Intent Document

30014025 - Women's Resource and Action Center Endowment Fund

Account Name: WRAC Endowment Fund

Account Number: 30-014-025

Date Established: 9/3/1996

Established By: UI

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):

Gift funds are to be used to provide long-term support for educational programs for the Women's Resource and Action Center (WRAC).

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014025 - Women's Resource and Action Center Endowment Fund

Run Time: 4:37:00 PM

BL inC DEF 008720

The University of Iowa Center for Advancement - Donor Intent Document

30014026 - The Associated Residence Hall - George Droll Leadership Award Fund

Account Name: The Associated Residence Hall - George Droll Leadership Award Fund
Account Number: 30-014-026

Date Established: 3/8/1997

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Gift funds are to be used to provide two scholarships for students active in residence hall government.

Through an application process overseen by ARH, students who are active in residence hall government (i.e., floor government, hall government, committee member, or voting member of ARH) are eligible for this award. Recipient must be currently involved in residence hall government, live in the residence hall system, have a demonstrated commitment to a living/learning community in the residence halls, and have a minimum cumulative grade-point average of 2.50. All full-time students are eligible and financial need is not a factor. Selection will be made by a committee established by ARH.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014026 - The Associated Residence Hall - George Droll Leadership Award Fund

Run Time: 4:37:00 PM

RI inC DEF 008724

The University of Iowa Center for Advancement - Donor Intent Document

30014029 - Dance Marathon Scholarship Fund

Account Name: Dance Marathon Scholarship Fund

Account Number: 30-014-029

Date Established: 11/24/1999

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Funds to be used to support scholarships for any immediate member of a Dance Marathon-sponsored family, who are current or prospective students at The University of Iowa.

Recipients will be an immediate member of a Dance Marathon-sponsored family who are current or prospective students at The University of Iowa in Iowa City, Iowa. Recipients must also be enrolled in a degree-program and at least a part-time student (6 semester hours for undergraduates and 5 hours for graduates). The Dance Marathon Allocation Committee will choose the recipients. This award is based wholly on academic merit. Applications should be submitted to the Dance Marathon Programming Director.

Donor Intent Document

30014029 - Dance Marathon Scholarship Fund

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

BLIND DEE 008722

The University of Iowa Center for Advancement - Donor Intent Document

30014031 - Iowa Memorial Union Fund

Revised Date: 7/16/2018

Revised Source: UI Center for Advancement

Intent:

The donor intent remains the same.

Date Established: 7/1/1983

Established By: UI Foundation

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

General account to support art and exhibit-related activities, general programs and projects at the discretion of the Director of the Iowa Memorial Union.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014031 - Iowa Memorial Union Fund

Run Time: 4:37:00 PM

RI inC DEF 008722

The University of Iowa Center for Advancement - Donor Intent Document

30014032 - Rape Victim Advocacy Program Fund

Account Name: Rape Victim Advocacy Program Fund

Account Number: 30-014-032

Date Established: 5/22/1989

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (Include date and description of restrictions and use):

The fund is to provide unrestricted support for the Rape Victim Advocacy Program.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014032 - Rape Victim Advocacy Program Fund

Run Time: 4:37:00 PM

RI inC DEE 008724

The University of Iowa Center for Advancement - Donor Intent Document

30014033 - Eileen Schenken Schmidt RVAP Fund

Account Name: Eileen Schenken Schmidt RVAP Fund

Account Number: 30-014-033

Date Established: 6/23/1992

Established By: Donor

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):

The annual spendable earnings from this fund are to be used at the discretion of the director of the Rape Victim Advocacy Program (RVAP) for the following purposes:

To provide programming and activities that promote community awareness of sexual abuse issues

To provide direct services to victims/survivors of sexual assault (including one-on-one counseling, support groups, printed materials, etc.)

To provide direct services to significant others of sexual assault victims/survivors; to promote sexual assault prevention/education; and

To support daily operations of the RVAP

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014033 - Eileen Schenken Schmidt RVAP Fund

Run Time: 4:37:00 PM

PL inC DEF 008725

The University of Iowa Center for Advancement - Donor Intent Document

30014035 - Raghu Bendigeri Memorial Scholarship Fund in the Fine Arts

Account Name: Raghu Bendigeri Memorial Scholarship Fund in Fine Arts
Account Number: 30-014-035

Date Revised: 1/07/2009
Revision Source: Request from Department
Endowment Type: Permanent endowment

Intent:

VP for Student Services requests to have the award given during one of the four thieves markets instead of Homecoming. The Fine Arts Council is more involved with the thieves market and awarding it then would provide more publicity.

Date Established: 1/18/1994
Established By: Donor
Endowment Type: Permanent endowment
Original Donor Intent (include date and description of restrictions and use):
Funds are to be used for student scholarship/scholarship award support.

One scholarship is to be awarded each year by the Fine Arts Council to a student deserving of special recognition based on creativity, personal growth, and perseverance in his or her field. Scholarship is to be awarded in memory of Raghu Bendigeri.

Applicants are to be nominated by a member of the faculty. Nomination forms to be available in the Office of Campus Programs and Student Activities. The Fine Arts Council will consider overall GPA and the recommendation provided by the faculty member to determine which students will be eligible for the second half of the selection process. During the second half of the selection process, Council members will conduct an interview, view/hear the student's work, and read an essay submitted by the student. Special consideration will be given to those students who have overcome personal or professional challenges to mature as an artist. Final selection will be made from a vote of the Council members for the best candidate. Scholarship recipient is to be announced during the week of Homecoming each year.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014035 - Raghu Bendigeri Memorial Scholarship Fund in the Fine Arts

Run Time: 4:37:00 PM
BI inC DEF 008728

The University of Iowa Center for Advancement - Donor Intent Document

30014045 - Support Service Programs Gift In Kind

Date Revised: 5/15/2015

Revision Source: UI Department

Endowment Type: Non-endowed

Intent:

Account closed per department request at 2015 account review meeting. Fund has never received a gift.

Date Established: 2/19/2003

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The purpose of this fund is to record gifts-in-kind (non-cash, non-stock, ie: books, artwork, computers, equipment, services, etc.).

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014045 - Support Service Programs Gift In Kind

Run Time: 4:37:00 PM

RI inC DEF 008727

The University of Iowa Center for Advancement - Donor Intent Document

30014046 - University of Iowa Homecoming Scholarship

Account Name: University of Iowa Homecoming Scholarship

Account Number: 30-014-046

Date Established: 10/11/2004

Established By: UI Department

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):

This fund is to be used to provide two or more annual scholarships for undergraduate students at The University of Iowa who are selected by a committee whose membership is identified annually by the Homecoming Executive Council. To be eligible for this award, students must meet the following criteria: achieved sophomore or junior status by September 1 of the academic year in which the award will be made; achieved a cumulative grade point average at or above the University of Iowa undergraduate average, and have demonstrated outstanding leadership to the University and its community. Students shall demonstrate their eligibility through written application and, when requested, an interview with the scholarship selection committee. The scholarship is nonrenewable.

The number of annual awards, amount awarded, and selection for recipients shall be determined by the Homecoming Executive Council in cooperation with the Office of Student Life and/or the Office of the Vice President for Student Services and the office of Student Financial Aid. The scholarship and awardees shall be publicized in a manner consistent with established procedures at the University.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014046 - University of Iowa Homecoming Scholarship

Run Time: 4:37:00 PM

RI inC DEE 008728

The University of Iowa Center for Advancement - Donor Intent Document

30014047 - UI Dance Marathon Perpetual Scholarship Fund

Account Name: UI Dance Marathon Perpetual Scholarship Fund

Account Number: 30-014-047

Date Established: 6/30/2006

Established By: UI Department

Endowment Type: Quasi-endowment

Original Donor Intent (include date and description of restrictions and use):

This fund was established as a quasi-endowment at the request of VP Phil Jones and at the recommendation of the Dance Marathon Allocations Committee to provide long-term support to the UI Dance Marathon Scholarship Program.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014047 - UI Dance Marathon Perpetual Scholarship Fund

Run Time: 4:37:00 PM

BLIND DEF 008720

The University of Iowa Center for Advancement - Donor Intent Document

30014048 - The 10,000 Hours Show of Eastern Iowa Fund

Account Name: The 10,000 Hours Show of Eastern Iowa Fund
Account Number: 30-014-048

Date Established: 12/18/2006
Established By: UI
Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):
To engage University of Iowa students and other local young people in the surrounding counties through volunteer service at local nonprofits and to produce a free concert just for these volunteers to encourage and recognize their service. Through these efforts, the 10,000 Hour Show mobilizes young people to help meet immediate community needs through volunteering and helps develop the next generation of active community leaders. The 10,000 Hours Show seeks to recruit new and existing volunteers into a continued life of service and civic responsibility.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014048 - The 10,000 Hours Show of Eastern Iowa Fund

Run Time: 4:37:00 PM

PL inC DEE 008730

The University of Iowa Center for Advancement - Donor Intent Document

30014049 - The Cassandra S. Foens, M.D. Lecture Fund

Account Name: The Cassandra S. Foens, M.D. Lecture Fund

Account Number: 30-014-049

Date Established: 7/18/2007

Established By: Donor

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):

This fund is established to endow a named annual lecture within the University Lecture Series during an academic year. The endowment will help cover the fees, including travel costs and hotel accommodations, associated with putting on one such event each year.

Donor Intent Document

30014049 - The Cassandra S. Foens, M.D. Lecture Fund

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

RI inC DEE 008734

The University of Iowa Center for Advancement - Donor Intent Document

30014050 - Student Health Development Fund

Account Name: Student Health Development Fund

Account Number: 30-014-050

Date Revised: 3/6/2008

Revision Source: Department Request

Endowment Type: Non-endowed

Intent:

Account renumbered 3/6/2008. Old account number: 30-595-011. The Director of UI Hospitals requested that the account be placed under the control of the Vice President for Student Services.

Date Established: 12/18/1979

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The fund is to pay for activities and programs which promote personal and personnel enrichment, enhance staff morale and increase interpersonal interaction.

Donor Intent Document

30014050 - Student Health Development Fund

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

BLIND DEF 008722

The University of Iowa Center for Advancement - Donor Intent Document

30014051 - Tom Rocklin Fund for Student Leadership Development

Date Revised: 6/30/2017

Revision Source: Donor

Endowment Type: Permanent endowment

Intent:

Fund shall be used to partially or completely fund one or more students each year to participate in leadership development conferences, institutes, workshops, or similar events. The Donor's intent is that the fund be used to partially or completely offset the cost of participation charged to specific individual students, as opposed to provide general funding for programs. Because the Donor seeks a positive impact not only for the individuals funded but also for the campus community as a whole, students who expect to remain at the University of Iowa for at least one year after completing the leadership development opportunity will be favored over those planning to leave the university in less than one year.

Name of the fund has been updated from Vice President's Fund for Student Leadership Development to Tom Rocklin Fund for Student Leadership Development.

Date Established: 5/7/2012

Established By: Donor

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):

Fund to be used to partially or completely fund several students each year for travel to off-campus leadership development conferences, institutes, workshops, or similar events. Because the Donor seeks a positive impact not only for the individuals funded but also for the campus community as a whole, students who expect to remain at the University of Iowa for at least one year after completing the leadership development opportunity will be favored over those leaving the university in less than one year.

Selection shall be in accord with standard requirements set forth by the vice president of student life or his/her designee. The number of annual awards, amount awarded, and selection of recipients shall be determined by the vice president of student life or his/her designee.

The University of Iowa Center for Advancement - Donor Intent Document

30014052 - Iowa N.E.W. Leadership Fund

Account Name: Iowa N.E.W. Leadership Fund

Account Number: 30-014-052

Date Established: 6/5/2012

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Funds to be used to support the University of Iowa's National Education for Women's (N.E.W.) Leadership, a non-partisan program with the long-term goal of increasing women's representation at all levels of government.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014052 - Iowa N.E.W. Leadership Fund

Run Time: 4:37:00 PM

PL inC DEE 008734

The University of Iowa Center for Advancement - Donor Intent Document

30014053 - Dinette L. Myers Quiet Leader Award

Account Name: Dinette L. Myers Quiet Leader Award
Account Number: 30-014-053

Date Established: 7/6/2012
Established By: UI Department
Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):
Fund to be used to support an award created in honor of Dinette Myers. The award will be presented to one member of the Panhellenic Council Sorority Community who embodies the leadership characteristics of a quiet, yet contributing member of her chapter and/or the Panhellenic Sorority Community. The recipient will be selected via the same process and timeline for the annual Fraternity and Sorority Life Awards.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014053 - Dinette L. Myers Quiet Leader Award

Run Time: 4:37:00 PM

BLIND DEE 008735

The University of Iowa Center for Advancement - Donor Intent Document

30014054 - Special Gifts Fund - Rape Victim Advocacy Program

Revised Date: 7/16/2018

Revised Source: UI Center for Advancement

Endowment Type: Non-endowed

Intent:

The donor intent remains the same.

Date Established: 9/10/2012

Established By: UI Foundation

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Funds to be used as a holding account for pass-through grants in support of the Rape Victim Advocacy Program (RVAP) that will be transferred to UI Grant Accounting.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014054 - Special Gifts Fund - Rape Victim Advocacy Program

Run Time: 4:37:00 PM

RI inc DEF 008736

The University of Iowa Center for Advancement - Donor Intent Document

30014055 - Cassandra S. Foens Iowa N.E.W. Leadership Keynote Address Fund

Account Name: Cassandra S. Foens Iowa N.E.W. Leadership Keynote Address Fund

Account Number: 30-014-055

Date Established: 12/21/2012

Established By: Donor

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):

Funds to be used to support an annual keynote address for the Iowa N.E.W. Leadership Institute.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014055 - Cassandra S. Foens Iowa N.E.W. Leadership Keynote Address Fund

Run Time: 4:37:00 PM

PL inC DEE 008737

The University of Iowa Center for Advancement - Donor Intent Document

30014056 - Cassandra S. Foens Iowa N.E.W. Leadership Fund

Account Name: Cassandra S. Foens Iowa N.E.W. Leadership Fund

Account Number: 30-014-056

Date Established: 12/21/2012

Established By: Donor

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):

Funds to be used to provide unrestricted support for the needs of the Iowa N.E.W. Leadership Institute.

Donor Intent Document

30014056 - Cassandra S. Foens Iowa N.E.W. Leadership Fund

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

BLIND DEE 008738

The University of Iowa Center for Advancement - Donor Intent Document

30014057 - Mary Peterson Sorority Woman of the Year Fund

Account Name: Mary Peterson Sorority Woman of the Year Fund

Account Number: 30-014-057

Date Established: 3/13/2013

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Funds to be used to provide an annual \$500 award to one member of the Panhellenic Council Sorority Community who not only has impacted the fraternity/sorority community, but also the greater university community.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014057 - Mary Peterson Sorority Woman of the Year Fund

Run Time: 4:37:00 PM

BLIND DEE 008720

The University of Iowa Center for Advancement - Donor Intent Document

30014058 - Andrew James Mogni Legacy Award

Date Established: 8/4/2015

Established By: UI Department

Endowment Type: Quasi-endowment

Original Donor Intent (include date and description of restrictions and use):

The Andrew James Mogni Legacy Award is sponsored by International Programs, Sigma Nu Fraternity, and the Interfraternity Council and is named in honor of Andrew James Mogni, and his dedication to academic excellence and commitment to improving the lives of others. This award was established to perpetuate the legacy of Andrew and his passion for teaching people how to live every day and love life to the fullest. The award honors one fraternity man annually, regardless of Council affiliation, on the basis of proven scholarship, demonstrated leadership, and a strong commitment to serving others.

Award Criteria:

- UI Fraternity Man (regardless of Council affiliation)
- Undergraduate upperclassmen (at least Junior standing)
- Cumulative GPA at or above 3.00
- Demonstrated exemplary service to another individual(s) or organization(s) (not limited to service to Iowa City or its surrounding communities)

Selection Process:

- Recipient will be selected via the same process and timeline as the Annual Fraternity and Sorority Life Awards.
- Representatives from International Programs, Sigma Nu Fraternity, the Interfraternity Council, and Center for Student Involvement & Leadership will be involved in the selection process.

The partnering organizations reserve the right to grow the fund to yield more than one award, should they choose to do so. It is understood that if this fund becomes no longer necessary, practical, or possible to perform, the remaining balance of the account will be spent at the discretion of the Vice President for Student Life.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014058 - Andrew James Mogni Legacy Award

Run Time: 4:37:00 PM

PL inC DEE 008710

The University of Iowa Center for Advancement - Donor Intent Document

30014059 - Finkbine Dinner Fund

Date Revised: 2/4/2016

Revision Source: Donor

Endowment Type: Non-endowed

Intent:

Name of fund has been updated from the Hancher Finkbine Dinner to the Finkbine Dinner Fund per the request of the donor.

Fund is to be used for direct related expenses of the annual Finkbine Dinner event.

Date Established: 12/30/2015

Established By: UI Foundation

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Fund to be used to pay for expenses for the annual Hancher-Finkbine dinner.

Donor Intent Document

30014059 - Finkbine Dinner Fund

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

RI inC DEE 008711

The University of Iowa Center for Advancement - Donor Intent Document

30014061 - Emrich Homecoming Fund

Date Established: 6/24/2016

Established By: Donor

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):

This fund recognizes two students selected each fall in conjunction with UI Homecoming. This award was established through a generous gift to the UI Foundation by Mr. Jeff Emrich, who was the 1982 Homecoming King. This endowment will serve as a lasting reminder of Mr. Emrich's longstanding commitment to the University of Iowa and its rich Homecoming tradition. The annual earnings from this fund will determine the total award amount and then be split into two equal awards. The awards will be given to two students who demonstrate commitment to academic pursuits, leadership skills, and service to the greater campus community. The award recipients will be selected through the process set forth by the UI Homecoming Council. The award disbursement will be administered through the Division of Student Life and will be credited to each students U-Bill in January for the spring semester.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014061 - Emrich Homecoming Fund

Run Time: 4:37:00 PM

PL inC DEF 008712

The University of Iowa Center for Advancement - Donor Intent Document**30014062 - Charlotte "Char" M. Sojka Fraternity Business Services Student Leader Award**

Date Established: 7/27/2016

Established By: UI Department

Endowment Type: Quasi-endowment

Original Donor Intent (include date and description of restrictions and use):
 Fund to be used to support an annual award, which will be presented to one student affiliated with UI Fraternity and Sorority Life Programs- regardless of chapter (or colony) or governing council affiliation- who is a current or former chapter (or colony) or council treasurer. The recipient will embody the characteristics of Char: dedicated, determined, organized, and an ongoing commitment to perform above and beyond their duty. The award will be in the form of a \$500 book stipend to be used at the Iowa Hawk Shop and Bookstore. The award will be presented at the annual Fraternity and Sorority Life Awards program each spring semester.

Award Criteria, Qualifications and Timeline:

- UI fraternity or sorority affiliated student (regardless of chapter/colony or council affiliation);
- Must be a current or former chapter/colony or governing council treasurer;
- Must be affiliated with a chapter/colony in good financial standing with the respective governing council and inter/national organization.
- Must possess a cumulative grade point average at or above the official All-FSL affiliated student grade point average;
- Must be enrolled in nine or more semester hours at the time of application;
- To be eligible to accept to award, the recipient must provide proof of enrollment, in nine or more semester hours, for the immediate subsequent semester (ie, the fall semester immediately following receipt of the award in the spring semester);
- Must have demonstrated dedication, determination and organization in the student's role as a chapter/colony or council treasurer within the UI Fraternity and Sorority Community;
- Must have demonstrated an ongoing commitment to performing above and beyond their duty as a chapter/colony or council treasurer within the UI Fraternity and Sorority Community;
- The recipient will be selected via the same process and timeline as the Annual Fraternity and Sorority Life Awards; and
- Representative from the Interfraternity Council, Multicultural Greek Council, National Pan-Hellenic Council, Panhellenic Council, Fraternity Business Services, Center for Student Involvement & Leadership, and Fraternity and Sorority Life Programs will be involved in the selection process.

The sponsoring organizations (ie, Iowa Memorial Union, Fraternity Business Services, and CSIL Fraternity and Sorority Life Programs) reserve the right to grow the fund to yield more than one award, should they choose to do so.

It is understood that if this fund becomes no longer necessary, practical, or possible to perform, the remaining balance of the account will be spent at the discretion of the Vice President for Student Life.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014062 - Charlotte "Char" M. Sojka Fraternity Business Services Student Leader Award

Run Time: 4:37:00 PM
PLINCO DEE 008743

The University of Iowa Center for Advancement - Donor Intent Document

30014063 - UI Counseling Services Gift Fund

Date Established: 8/24/2016

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

This fund will be used at the discretion of the Director for University of Iowa Counseling Services to support University of Iowa Counseling Services.

Donor Intent Document

30014063 - UI Counseling Services Gift Fund

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

RI inC DEE 008744

The University of Iowa Center for Advancement - Donor Intent Document

30014064 - Lesbian, Gay, Bisexual, Transgender & Queer Resource Center Student Fund

Date Established: 1/25/2017

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Funds are to be used to support cultural, educational, social, and recreational programs and events sponsored by the Lesbian, Gay, Bisexual, Transgender & Queer Resource Center (LGBTQRC). The funds are allocated at the discretion of the Executive Director, Iowa Memorial Union and Director, Center for Student Involvement & Leadership.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014064 - Lesbian, Gay, Bisexual, Transgender & Queer Resource Center Student Fund

Run Time: 4:37:00 PM

RI inC DEE 008715

The University of Iowa Center for Advancement - Donor Intent Document

30014065 - Asian Pacific American Cultural Center (APACC) Student Fund

Date Established: 1/25/2017

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Funds are to be used to support cultural, educational, social, and recreational programs and events sponsored by the Asian Pacific American Cultural Center (APACC). The funds are allocated at the discretion of the Executive Director, Iowa Memorial Union and Director, Center for Student Involvement & Leadership.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014065 - Asian Pacific American Cultural Center (APACC) Student Fund

Run Time: 4:37:00 PM

RI inC DEF 008716

The University of Iowa Center for Advancement - Donor Intent Document

30014066 - Sean Wu Memorial Scholarship

Date Established: 6/27/2017

Established By: Donor

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):

Fund will be used to support three annual scholarships to deserving students; one each in the University of Iowa Department of English, Bijou Film Board, and KRUI Radio. The scholarship shall be open to all applicants regardless of race, color, religion, sex, national origin, citizenship, disability, age, or veteran status.

The annual payout shall be divided as follows:

50 percent of the annual payout, with an initial target of \$1,000/year, shall be used to support a scholarship in the Department of English. The scholarship will support a freshman English major in Creative Writing who shows promise in this area.

25 percent of the annual payout, with an initial target of \$500/year, shall be used to support a scholarship for a student who is actively involved in Bijou Film Board. In the event that Bijou Film Board contributes to the Sean Wu Memorial Scholarship, the contribution/earnings would be an incremental addition to the 25 percent core payout.

25 percent of the annual payout, with an initial target of \$500/year, shall be used to support a scholarship for a student who is actively involved in KRUI student radio. In the event KRUI Radio contributes to the Sean Wu Memorial Scholarship, the contribution/earnings would be an incremental addition to the annual 25 percent core payout.

In each case, the scholarship recipient shall be selected based on guidelines and procedures established by each department/program. It is the donor's desire that for the Department of English scholarship, students who actively participate in the Bijou Film Board or KRUI be given extra credit if there are more than one similarly qualified candidates. If a recipient matching the stated preferences cannot be found, the award will be given to an active individual(s) who most closely matches the stated preferences. The scholarship and awardees shall be publicized in a manner consistent with established procedures within the University of Iowa Department of English, Bijou Film Board, and KRUI Radio programs, respectively

The University of Iowa Center for Advancement - Donor Intent Document

30014067 - RVAP Crowdfunding Project

Date Revised: 9/29/2017

Revision Source: UI Foundation

Endowment Type: Non-endowed

Intent:

Funds transferred and closed per UI Foundation request.

Date Established: 08/02/2017

Established By: UI Foundation

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

This account will serve as depository for the gifts made to the crowdfunding campaign.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014067 - RVAP Crowdfunding Project

Run Time: 4:37:00 PM

PI inC DEC 002712

The University of Iowa Center for Advancement - Donor Intent Document

30014068 - Vice President for Student Life Directed Gift Fund

Date Established: 02/06/2018
Established By: UI Department
Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):
Fund established to accept directed gifts for the VP for Student Life
department.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014068 - Vice President for Student Life Directed Gift Fund

Run Time: 4:37:00 PM

BLIND 008740

The University of Iowa Center for Advancement - Donor Intent Document

30014069 - Hawkeye Completion Grant

Date Established: 02/12/18

Established By: UICA

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

UISG is leading a crowdfunding campaign from February 16 - March 25, 2018 to create the Hawkeye Retention Grant. This account will serve as a depository for the gifts made to this crowdfunding campaign through the GOLDrush platform. All funds deposited into this account will be transferred to an MFK provided by UISG.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30014069 - Hawkeye Completion Grant

Run Time: 4:37:00 PM

BLIND DEF 008750

The University of Iowa Center for Advancement - Donor Intent Document

30017008 - M. L. Huit ODK Award Fund

Revised Date: 7/16/2018

Revised Source: UI Center for Advancement

Endowment Type: Non-endowed

Intent:

The donor intent remains the same.

Date Revised: 4/4/2007

Revision Source: UI Foundation

Endowment Type: Non-endowed

Intent:

Account renumbered 4/4/2007. Old account number: 30-050-037. This account was renumbered to be under the control of the Office of the Provost instead of the College of Liberal Arts and Sciences.

Date Established: 4/8/1981

Established By: Donor

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

This account was established to assist with expenses related to Omicron Delta Kappa activities. Specific preference should direct support to those travel expenses incurred for Province and National ODK conventions and meetings.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30017008 - M. L. Huit ODK Award Fund

Run Time: 4:37:00 PM

BLIND DEE 008751

The University of Iowa Center for Advancement - Donor Intent Document

30017009 - ODK Leadership Fund

Revised Date: 7/16/2018

Revised Source: UI Center for Advancement

Endowment Type: Non-endowed

Intent:

The donor intent remains the same.

Date Revised: 4/4/2007

Revision Source: UI Foundation

Endowment Type: Non-endowed

Intent:

Account renumbered 4/4/2007. Old account number: 30-050-038. This account was renumbered to be under the control of the Office of the Provost instead of the College of Liberal Arts and Sciences.

Date Established: 6/2/1964

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The Omicron Delta Kappa Leadership Fund was established in the 1960s to receive voluntary contributions from ODK alumni and others interested in the strength and perpetuation of the UI Circle of ODK.

The University of Iowa Center for Advancement - Donor Intent Document

30050013 - David and Rosalie Braverman Fund

Date Revised: 6/21/2007

Revision Source: Donor's Trust

Endowment Type: Permanent endowment

Intent:

The account name was changed from the David Braverman Endowment Fund to the David and Rosalie Braverman Fund to match the fund name in the donor's trust.

Date Revised: 6/4/1991

Revision Source: Correspondence

Endowment Type: Permanent endowment

Intent:

The donor approved that the fund help support the program budget of Hillel House including, but not limited to, printing costs, advertising, mean programs, and speeches.

Date Established: 9/11/1986

Established By: Donor

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use:

The fund supports a graduate assistantship for the Hillel House.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30050013 - David and Rosalie Braverman Fund

Run Time: 4:37:00 PM

RI inc DEF 008752

The University of Iowa Center for Advancement - Donor Intent Document

30050049 - Maria Cano Martinez Scholarship Fund

Date Revised: 9/7/2016

Revision Source: UI Department

Endowment Type: Non-endowed

Intent:

Fund was moved from the Office of Diversity into the VP for Student Life at the request of the UI Department.

Date Established: 5/1/1982

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Purpose of fund is to promote understanding and the study of Chicano/ Latino issues by providing funds for a student who promotes understanding through scholarly activity or working with Chicano/Latino organizations on the campus or in the community.

Applicants must have completed one semester of full-time successful academic study at The University of Iowa with intentions of completing degree objective at UI. Demonstrate interest and work toward promoting cultural awareness of Chicano/Latino populations. Demonstrate academic achievement. Demonstrate that through scholarly activity or extracurricular activity in Chicano/Latino organizations they will make a contribution advancing Chicano/Latino concerns. Demonstrate involvement in one Chicano/Latino student and/or community organization.

The University of Iowa Center for Advancement - Donor Intent Document

30070130 - Lesbian/Gay and Bisexual Staff and Faculty Association

Account Name: Lesbian/Gay and Bisexual Staff and Faculty Association

Account Number: 30-070-130

Date Established: 11/11/1991

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The fund is to provide unrestricted support for the Lesbian/Gay and Bisexual Staff and Faculty Association.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30070130 - Lesbian/Gay and Bisexual Staff and Faculty Association

Run Time: 4:37:00 PM

BLIND DEE 008755

The University of Iowa Center for Advancement - Donor Intent Document

30070159 - Sailing Club Building Fund

Account Name: Sailing Club Building Fund
Account Number: 30-070-159

Date Established: 12/30/1980

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Fund is established to build a Sailing Club building at Lake MacBride and help promote the Sailing Club primarily through maintenance and expansion of its Club's fleet and facilities.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30070159 - Sailing Club Building Fund

Run Time: 4:37:00 PM

BLIND DEE 008756

The University of Iowa Center for Advancement - Donor Intent Document

30070160 - Sailing Team Fund

Account Name: Sailing Team Fund

Account Number: 30-070-160

Date Established: 12/1/1958

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Fund is established to help promote the Sailing Club primarily through maintenance and expansion of the Club's fleet and facilities, its support of recreational and water safety teaching programs, and the promotion of top-flight competitive racing teams for entry at regional, national, and perhaps international events.

Donor Intent Document

30070160 - Sailing Team Fund

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

BLIND DEE 008757

The University of Iowa Center for Advancement - Donor Intent Document

30070161 - Iowa Sailing Club Gifts in Kind

Account Name: Iowa Sailing Club Gifts in Kind

Account Number: 30-070-161

Date Established: 6/21/1977

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The purpose of this fund is to record gifts-in-kind (non-cash, non-stock, ie: books, artwork, computers, equipment, services, etc.).

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30070161 - Iowa Sailing Club Gifts in Kind

Run Time: 4:37:00 PM

RI inC DEE 008758

The University of Iowa Center for Advancement - Donor Intent Document

30070164 - Hawkeye Soccer Club Gift Fund

Account Name: Hawkeye Soccer Club Gift Fund
Account Number: 30-070-164

Date Established: 9/21/1981

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Fund established to accept gifts by persons wishing to promote the activities of the Hawkeye Soccer Club.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30070164 - Hawkeye Soccer Club Gift Fund

Run Time: 4:37:00 PM

BLIND DEF 008750

The University of Iowa Center for Advancement - Donor Intent Document

30070165 - Iowa Lacrosse Club Gift Fund

Account Name: Iowa Lacrosse Club Gift Fund

Account Number: 30-070-165

Date Established: 10/6/1981

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The fund is to provide unrestricted support for the activities of the Iowa Lacrosse Club.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30070165 - Iowa Lacrosse Club Gift Fund

Run Time: 4:37:00 PM

RI inC DEE 008760

The University of Iowa Center for Advancement - Donor Intent Document

30070166 - Iowa Rowing Association Gift Fund

Account Name: Iowa Rowing Association Gift Fund
Account Number: 30-070-166

Date Established: 6/21/1982

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The fund is to provide unrestricted support for the activities of Iowa Rowing Association.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30070166 - Iowa Rowing Association Gift Fund

Run Time: 4:37:00 PM

BLIND DEE 008761

The University of Iowa Center for Advancement - Donor Intent Document

30070168 - UI Women's Water Polo Club

Account Name: UI Women's Water Polo Club

Account Number: 30-070-168

Date Established: 6/30/2002

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The fund is to provide unrestricted support for the University of Iowa Women's Water Polo Club.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30070168 - UI Women's Water Polo Club

Run Time: 4:37:00 PM

RI inC DEF 008762

The University of Iowa Center for Advancement - Donor Intent Document

30070169 - UI Ice Hockey Club

Account Name: UI Ice Hockey Club
Account Number: 30-070-169

Date Established: 12/12/1986

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The funds will be used for Midwest Collegiate Hockey Association fees, ice rentals, transportation rentals or deposits, pucks, sticks and possibly a skate sharpener or other equipment. All expenditures are related to the Ice Hockey program.

Donor Intent Document

30070169 - UI Ice Hockey Club

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

RI inC DEF 008763

The University of Iowa Center for Advancement - Donor Intent Document

30070170 - Iowa Rowing Association Gifts in Kind

Date Revised: 7/13/2016
Revision Source: Donor
Endowment Type: Non-endowed

Intent:
Gift received. Account re-opened.

Date Revised: 1/20/2015
Revision Source: UIF Review
Endowment Type: Non-endowed

Intent:
Account closed due to no activity.

Date Established: 12/31/1986
Established By: UI Department
Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):
The purpose of this fund is to record gifts-in-kind (non-cash, non-stock, ie: books, artwork, computers, equipment, services, etc.).

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30070170 - Iowa Rowing Association Gifts in Kind

Run Time: 4:37:00 PM

BL inC DEF 008764

The University of Iowa Center for Advancement - Donor Intent Document

30070172 - Men's Rugby Club Team Fund

Account Name: Men's Rugby Club Team Fund
Account Number: 30-070-172

Date Established: 11/7/1989

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The purpose of this account will be to deposit gifts received from donations and fund-raising activities. This money will be spent for equipment, expenses/fees for competition, club development activities and other expenses as approved by the Rugby Club Faculty Advisor.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30070172 - Men's Rugby Club Team Fund

Run Time: 4:37:00 PM

BLIND DEE 008765

The University of Iowa Center for Advancement - Donor Intent Document

30070175 - Iowa Triathlon Club Fund

Account Name: Iowa Triathlon Club Fund

Account Number: 30-070-175

Date Established: 8/19/1991

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The fund is to provide unrestricted support for the Associate Director of Recreational Services for Iowa Triathlon Club program support.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30070175 - Iowa Triathlon Club Fund

Run Time: 4:37:00 PM

RI inC DEF 008766

The University of Iowa Center for Advancement - Donor Intent Document

30070177 - UI Synchronized Swimming Club Fund

Account Name: UI Synchronized Swimming Club Fund
Account Number: 30-070-177

Date Established: 11/13/1996

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The fund is to provide unrestricted support for the UI Synchronized Swimming Club.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30070177 - UI Synchronized Swimming Club Fund

Run Time: 4:37:00 PM

BLIND DEF 008767

The University of Iowa Center for Advancement - Donor Intent Document

30070178 - Hawkeye Chess Club Fund

Account Name: Hawkeye Chess Club Fund
Account Number: 30-070-178

Date Established: 10/2/1997

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The fund is to provide unrestricted support for the University of Iowa Hawkeye Chess Club.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30070178 - Hawkeye Chess Club Fund

Run Time: 4:37:00 PM

BLIND DEE 008768

The University of Iowa Center for Advancement - Donor Intent Document

30070180 - UI Men's Water Polo Club

Account Name: UI Men's Water Polo Club

Account Number: 30-070-180

Date Established: 11/5/1998

Established By: Donor

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The fund is to provide unrestricted support for the University of Iowa Men's Water Polo Club.

Donor Intent Document

30070180 - UI Men's Water Polo Club

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

BL inC DEF 008760

The University of Iowa Center for Advancement - Donor Intent Document

30070181 - Men's Volleyball Club

Account Name: Men's Volleyball Club
Account Number: 30-070-181

Date Established: 10/13/1999

Established By: Donor

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The fund is to provide unrestricted support for the Iowa Men's Volleyball Club.

Donor Intent Document

30070181 - Men's Volleyball Club

Run By: UFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

BLIND DEE 008770

The University of Iowa Center for Advancement - Donor Intent Document

30070182 - Waterski Club

Account Name: Waterski Club

Account Number: 30-070-182

Date Established: 5/5/2000

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The fund is to provide unrestricted support for the UI Waterski Club.

The University of Iowa Center for Advancement - Donor Intent Document

30070191 - Recreational Services Fund

Account Name: Recreational Services Fund

Account Number: 30-070-191

Date Established: 1/1/1982

Established By: UI Department and UIF Staff

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):
The fund is to provide unrestricted support for the head of Recreational
Services for program support.

Donor Intent Document

30070191 - Recreational Services Fund

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

BL inC DEF 008772

The University of Iowa Center for Advancement - Donor Intent Document

30070192 - Macbride Nature Recreation Area Fund

Account Name: Macbride Nature Recreation Area Fund

Account Number: 30-070-192

Date Revised: 10/25/2013

Revision Source: UI Department

Endowment Type: Non-endowed

Intent:

Fund is to support a variety of UI Recreational Services environmental education and outdoor recreation programs at the Macbride Nature Recreation Area at the discretion of the Director of Recreational Services. Initiatives may include, but are not limited to, the Macbride Raptor Project, UI Wildlife Camps and School of the Wild.

Date Revised: 7/11/1997

Revision Source: Acknowledgement Letter to Donor

Endowment Type: Non-endowed

Intent:

The intent was expanded to include conduct research.

Date Revised: 3/1989

Revision Source: Internal handwritten note to research

Endowment Type: Non-endowed

Intent:

To support the Macbride Raptor Center, formerly the University of Iowa Raptor Center. The center is run by both the University of Iowa and Kirkwood Community College. The main function of the Raptor Center is to rehabilitate injured birds of prey and return them to the wild and educate the public.

Kirkwood is in charge of the animal clinic. Animal technicians will perform surgery on the birds and send them to the Raptor Center after they are strong enough. Macbride has the flight cases, display cases, and is in charge of the education program.

Date Established: 12/4/1985

Established By: UIF Staff and UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

Rehabilitation of raptors for return to their natural environment and educate the public about raptors.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30070192 - Macbride Nature Recreation Area Fund

Run Time: 4:37:00 PM

BLIND DEE 008773

The University of Iowa Center for Advancement - Donor Intent Document

30070193 - Recreational Services Gifts in Kind

Account Name: Recreational Services Association Gifts in Kind
Account Number: 30-070-193

Date Established: 7/13/1986

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The purpose of this fund is to record gifts-in-kind (non-cash, non-stock, ie: books, artwork, computers, equipment, services, etc.).

Donor Intent Document

30070193 - Recreational Services Gifts in Kind

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

BL inC DEF 008774

The University of Iowa Center for Advancement - Donor Intent Document

30070233 - Ultimate Frisbee Club Fund

Date Revised: 10/19/2015

Revision Source: UI Department

Endowment Type: Quasi-endowed

Intent:

Department requested the fund be updated from a non-endowed fund to a quasi endowed fund.

Date Established: 1/25/2008

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The fund is to provide unrestricted support for the Ultimate Frisbee Club.

Donor Intent Document

30070233 - Ultimate Frisbee Club Fund

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

BLIND DEE 008775

The University of Iowa Center for Advancement - Donor Intent Document

30070240 - Harry Ostrander Recreational Services Scholarship Fund

Account Name: Harry Ostrander Recreational Services Scholarship Fund

Account Number: 30-070-240

Date Established: 6/7/2013

Established By: UI Department

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):
Fund is to be used to support an academic scholarship to a Recreational
Services Student in honor of Harry Ostrander.

Donor Intent Document

Run By: UFOUNDATION\braem

Run Date: 08/02/2018

30070240 - Harry Ostrander Recreational Services Scholarship Fund

Run Time: 4:37:00 PM

BL inC DEF 008776

The University of Iowa Center for Advancement - Donor Intent Document

30120116 - Lambda Chi Alpha Mom B Scholarship Fund

Date Revised: 3/7/2016

Revision Source: Donor

Endowment Type: Permanent endowment

Intent:

The Lambda Chi " Mom B Scholarship Fund will be used to support one or more annual scholarships to a member of the local chapter of Lambda Chi Alpha who is a leader in the fraternity. The Executive Committee of the Lambda Chi Alpha, plus one additional alumnus, will determine recipients through an application process that focuses on scholarship, leadership, and service.

Funds may also be used to award one or more Mom B Leadership Scholarships to a deserving student interested in joining the Greek System. It is the Executive Committee's preference that recipients will be selected based on an application and interview process, high school/collegiate activities, and scholarship, leadership, and service. Recipients will be selected by a Scholarship Committee established by the Scholarship and Recruitment chairmen. Recipients do not need to join Lambda Chi Alpha Fraternity to receive the award.

Names of award recipients will be forwarded to the Office of University Student Life for award disbursement. The scholarship and awardees shall be publicized in a manner consistent with established procedures within the Office of University Student Life.

Date Revised: 11/7/1995

Revision Source: Memo

Endowment Type: Permanent endowment

Intent:

Due to the inactive status of the Lambda Chi Alpha fraternity, this account will reinvest earnings until further notice. Scholarship disbursements will not begin again until after the Chapter is reactivated and The University of Iowa Foundation is notified.

Date Established: 4/16/1991

Established By: Donor

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):
Scholarship to be awarded to a loyal member of the local chapter of Lambda Chi Alpha who is a leader in the fraternity. Grades and need will be considered but are of less significance. A committee composed of Lambda Chi Alpha alumni will screen applicants and select three or more candidates whose names will be submitted to the Financial Aid Office where final choice will be made.

The University of Iowa Center for Advancement - Donor Intent Document

30120131 - Chi Omega Scholarship Fund

Date Revised: 6/8/2018

Revision Source: UICA Account Review

Endowment Type: Permanent endowment

Intent:

During the annual account review process, the OFSA requested that this fund be moved from their office into Office of University Student Life.

Date Established: 10/6/1993

Established By: Donor

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):

Income to support a non-renewable scholarship to be presented annually to a selected candidate in Chi Omega's Name. The sorority will screen applications and choose a qualified UI student based on the following criteria: Preference to be given to a junior, female student, who is a member of the University of Iowa Greek system. Applicants will be considered based on their service to the University and community and demonstrated leadership abilities. In addition, students must have a minimum 3.0 GPA to apply.

Donor Intent Document

30120131 - Chi Omega Scholarship Fund

Run By: UFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

RI inC DEF 008778

The University of Iowa Center for Advancement - Donor Intent Document

30120261 - Sigma Alpha Epsilon "Brother Hero" Scholarship

Date Revised: 2/9/2013

Revision Source: UI Department

Endowment Type: Permanent endowment

Intent:

VP Rocklin and Bill Nelson said there are no student eligible, but the chapter can be reactivated in four years, which they expect to happen. Funds are to be held until the 2017-18 academic year.

Date Revised: 12/16/2011

Revision Source: Request from Donor

Endowment Type: Permanent endowment

Intent:

The donor would like to see the funds spent and closed after the last scholarship has been awarded. Funds from the endowment have been moved into cash per the request of the donor.

Date Established: 12/30/2005

Established By: Donor

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):

This fund is to be used to provide scholarship support for students in the Sigma Alpha Epsilon Fraternity. The number of annual awards, amount awarded, and selection of recipients shall be determined by the scholarship committee of the University of Iowa Chapter of Sigma Alpha Epsilon.

Donor Intent Document

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

30120261 - Sigma Alpha Epsilon "Brother Hero" Scholarship

Run Time: 4:37:00 PM

BL inC DEF 008770

The University of Iowa Center for Advancement - Donor Intent Document

30120284 - Melissa Ann Brendes Memorial Scholarship

Date Revised: 4/6/2016

Revision Source: UI Department

Endowment Type: Permanent endowment

Intent:

At the request of the Office of Student Financial Aid, this account should be administered by the VP Student Life office.

Date Established: 3-31-2009

Established By: Donor

Endowment Type: Non-endowed

Original Donor Intent (include date and description of restrictions and use):

The funds are to be used to support one or more annual scholarships to deserving students at The University of Iowa. When selecting recipients, it is the donor's wish that preference be given to an active sophomore, junior, or senior member of Tau Chapter, Delta Gamma. Members are eligible if they have been a member of the chapter for a minimum of two consecutive full semesters and are in good academic standing. Furthermore, it is the donor's preference that this scholarship shall not be renewable. If a recipient matching the stated preferences cannot be found, the award will be given to an individual(s) who most closely matches the stated preferences.

Selection shall be in accord with standard requirements set forth by the VP for Student Life Office. The number of annual awards, amount awarded, and selection of recipients shall be determined by the VP for Student Life Office. The scholarship and awardees shall be publicized in a manner consistent with established procedures within the VP for Student Life Office.

Donor Intent Document

Run By: UFOUNDATION\braem

Run Date: 08/02/2018

30120284 - Melissa Ann Brendes Memorial Scholarship

Run Time: 4:37:00 PM

BLIND DEE 008780

The University of Iowa Center for Advancement - Donor Intent Document

30120310 - Edith Williams Malone Scholarship

Date Revised: 4/6/2016

Revision Source: UI Department

Endowment Type: Permanent endowment

Intent:

At the request of the Office of Student Financial Aid, this account should be administered by the VP Student Life office.

Date Established: 11/2/2011

Established By: Donor

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):

Fund to be used to support one or more annual scholarships to deserving students at The University of Iowa. When selecting recipients it is the Donor's wish that preference be given to female students who are members of the Kappa Alpha Theta Sorority and demonstrate financial need. Furthermore, it is the Donor's preference that this scholarship shall be renewable to any recipient, so long as the recipient continues to qualify under the specified criteria. If a recipient matching the stated preferences cannot be found, the award will be given to an individual(s) who most closely matches the stated preferences.

Selection shall be in accord with standard requirements set forth by the VP for Student Life Office. The number of annual awards, amount awarded, and selection of recipients shall be determined by the VP for Student Life Office. The scholarship and awardees shall be publicized in a manner consistent with established procedures within the VP for Student Life Office.

Donor Intent Document

30120310 - Edith Williams Malone Scholarship

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

BL inC DEF 008781

The University of Iowa Center for Advancement - Donor Intent Document

30120314 - Ramona Ann Mayer Scholarship Fund

Date Established: 12/31/2011

Established By: Donor

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):

Fund to be used to provide scholarship award(s) to needy and deserving undergraduate students with preference given to students with physical disabilities. Selection to be determined by the director of Student Disabilities Services.

Donor Intent Document

30120314 - Ramona Ann Mayer Scholarship Fund

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

BL inC DEF 002782

The University of Iowa Center for Advancement - Donor Intent Document

30120329 - Phi Kappa Psi Scholarship Fund

Account Name: Phi Kappa Psi Scholarship Fund

Account Number: 30-120-329

Date Established: 2/28/2014

Established By: Donor

Endowment Type: Permanent endowment

Original Donor Intent (include date and description of restrictions and use):
Fund to be used to support one or more annual scholarships to deserving students at The University of Iowa.

Phi Kappa Psi - Iowa Alpha Fraternity will screen applications and choose a candidate who qualifies according to its internal selection process with oversight by the Office of Student Financial Aid. Furthermore, it is the Donor's preference that this scholarship shall not be renewable. If a recipient matching the stated preferences cannot be found, the award will be given to an individual(s) who most closely matches the stated preferences.

If Phi Kappa Psi - Iowa Alpha Fraternity and the Phi Kappa Psi Alumni Inc. should cease to exist, the Office of Student Financial Aid will assume the selection process.

The number of annual awards, amount awarded, and selection of recipients shall be determined by the Office of Student Financial Aid in cooperation with Phi Kappa Psi - Iowa Alpha Fraternity. The scholarship and awardees shall be published in a manner consistent with established procedures within the Office of Student Financial Aid.

Donor Intent Document

30120329 - Phi Kappa Psi Scholarship Fund

Run By: UIFOUNDATION\braem

Run Date: 08/02/2018

Run Time: 4:37:00 PM

RI inC DEF 008782

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
EASTERN DIVISION

Business Leaders in Christ,)
)
 Plaintiff,)
)
 vs.)No. 17-Cv-00080-SMR-SBJ
)
The University of Iowa,)
et al.,)
)
 Defendants.)

DEPOSITION OF LYN REDINGTON, taken on
Thursday, August 9, 2018, commencing at 9:43 a.m.,
at UI Research Park, 2500 Crosspark Road,
Coralville, Iowa, before Karrie D. Truitt,
Certified Shorthand Reporter of the State of Iowa,
pursuant to the within stipulation.

APPEARANCES:

Eric Baxter, of Becket Religious Liberty for All,
Attorneys at Law, 1200 New Hampshire Avenue,
Northwest, Suite 700, Washington, DC 20036,
Attorney for the Plaintiff.

George A. Carroll, Assistant Attorney General,
Office of the Attorney General of Iowa, Second
Floor, Hoover State Office Building, Des Moines,
Iowa 50319, Attorney for the Defendants.

Maria Lukas, of University of Iowa Office of
General Counsel, 120 Jessup Hall, Iowa City,
Iowa 52242-1316, Attorney for the Defendants.

Karrie D. Truitt, CSR, RPR
Carson Reporting, Inc.
118 - 3rd Avenue, Southeast, Suite 301,
Cedar Rapids, Iowa 52401
(319) 366-7450

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WITNESS

Lyn Redington

NUMBER

EXHIBIT

Defendant, Lyn Redington, Answers to First Set of Interrogatories

Dean of Students Registration of Student Organizations Policy; P 000272-9

PowerPoint Presentation Slides, University of Iowa Policy on Human Rights; BLinC-Def 000928-52

7/24/17 Schriver Memo to Student A, et al., with Finding on Formal Complaint of Discrimination Attached; BLinC-Def 002674-85

3/29/16 Miller Message String; P 000007

2/20/17, 6/22/16, 5/17/16 Miller/Thompson Email String; BLinC-Def 002597-9

CONFIDENTIAL Inquiry/Complaint Form; P 000024

2/20/17 Schriver Letter to Thompson; P 000027-8

2/22/17 Baker Email to Cervantes/Finger; BLinC-Def 002710

5/12/17 Thompson Letter to Schriver Cervantes

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S T I P U L A T I O N

"The deposition of Lyn Redington is being taken at this time and place pursuant to the Federal Rules of Civil Procedure and may be used for all purposes authorized by said Rules."

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E X H I B I T S (Cont'd.)

NUMBER

EXHIBIT

6/30/17 Schriver Cervantes Memo to Student A, et al. with Finding on Formal Complaint of Discrimination; BLinC-Def 002562-8

7/2017 Baker Memo to Nelson; BLinC-Def 003405-6

7/14/17 Estell Letter to Redington; BLinC-Def 002686-7

7/14/17 Redington/Nelson/Baker/Estell Email String; BLinC-Def 003479-80

7/14/17 Handwritten Notes; BLinC-Def 002689

8/14/17 Redington/Nelson/Miller Email String; BLinC-Def 003570

9/13/17 Nelson Letter to Estell; BLinC-Def 002571-2

9/27/17, 9/18/17, 9/13/17 Baxter/Nelson/Estell Email String; BLinC-Def 003550-2

9/27/17 The Constitution of Business Leaders in Christ; BLinC-Def 03553-9

10/19/17 Nelson Letter to Estell; BLinC-Def 002578-9

PERSONAL AND CONFIDENTIAL 11/16/17 Redington Letter to Estell; BLinC-Def 002590-1

12/15/17 Shivers Email to Timmons, et al.; BLinC-Def 003691

Document Attached to 2/22/17 Baker Email to Cervantes/Finger

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LYN REDINGTON was called as a witness and, being first duly sworn, testified as follows:

DIRECT EXAMINATION

BY MR. BAXTER:

Q. Good morning. Could you please state your name for the record?

A. Lyn Redington.

Q. And you're a former employee of the University of Iowa; is that correct?

A. I am.

Q. When did you first become employed at the University?

A. August of 2015.

Q. And where were you before that?

A. University of Northern Iowa.

Q. And how long were you there?

A. Approximately 21 years.

Q. And were you in a similar position there?

A. I held the role of interim dean of students for one year when I was there, but otherwise I was director of residence life and also served as an adjunct faculty in the college of education.

Q. When did you leave the University of Iowa?

A. I retired, I believe it was May 1, 2018.

Q. And were you actively employed up 'til that

<p style="text-align: right;">6</p> <p>1 date?</p> <p>2 A. I had a lot of vacation accrued, and so I used</p> <p>3 a lot of vacation during some of March and April. But,</p> <p>4 yes, I was actively employed.</p> <p>5 Q. And what was your responsibility -- What was</p> <p>6 your title while you were at the University of Iowa?</p> <p>7 A. Title was assistant vice president and dean of</p> <p>8 students.</p> <p>9 Q. And what were your major responsibilities?</p> <p>10 A. Primary responsibility as dean of students was</p> <p>11 the overseeing of student conduct process in the Student</p> <p>12 Care and Assistance Office. Then I also oversaw through</p> <p>13 supervision the Iowa Memorial Union and all of its</p> <p>14 auxiliaries or all of its units, including the student</p> <p>15 activities, the bookstore, the hotel. I didn't directly</p> <p>16 supervise them, but I supervised Dr. Nelson.</p> <p>17 Q. What is the student conduct piece?</p> <p>18 A. That's when if students violate or allegedly</p> <p>19 violated a student conduct policy then they go before --</p> <p>20 they go through our student conduct system.</p> <p>21 Q. Have you ever been deposed before?</p> <p>22 A. Yes.</p> <p>23 Q. When was that?</p> <p>24 A. Probably in the -- I would say mid to late</p> <p>25 1990s I think.</p>	<p style="text-align: right;">8</p> <p>1 is registered or deregistered?</p> <p>2 A. I think so, yes.</p> <p>3 Q. I'm going to ask you to look at the document</p> <p>4 in front of you behind tab number 6. Do you recognize</p> <p>5 this document?</p> <p>6 A. Yes.</p> <p>7 Q. What is it?</p> <p>8 A. It is the document that I completed.</p> <p>9 Q. And did you understand that when you filled</p> <p>10 this out you were making -- providing information under</p> <p>11 oath?</p> <p>12 A. Yes.</p> <p>13 Q. I'm going to ask you within that same document</p> <p>14 to flip to page 3, Interrogatory Number 1. It asks you</p> <p>15 to identify persons you've communicated with concerning</p> <p>16 this matter. Who is Angela Ibrahim-Olin with respect to</p> <p>17 the U? Did she work under you?</p> <p>18 A. She worked -- her supervisor -- Angela started</p> <p>19 approximately a year after I did, and she had a couple</p> <p>20 of different supervisors. At one point she reported</p> <p>21 directly to me. I don't believe it was during this</p> <p>22 time. I believe when this was happening she reported to</p> <p>23 Dr. Angie Reams.</p> <p>24 Q. Why would you have spoken to Angela about the</p> <p>25 BLinC matter?</p>
<p style="text-align: right;">7</p> <p>1 Q. Were you a party in the case or a witness?</p> <p>2 A. I'm not a lawyer, so I'm going to assume I was</p> <p>3 a party.</p> <p>4 Q. Were you sued or did you sue someone?</p> <p>5 A. I did not sue anyone. Somebody sued the</p> <p>6 University, and I was a part of that process.</p> <p>7 Q. Were you an official witness? Did you speak</p> <p>8 on behalf of the University at your deposition,</p> <p>9 sometimes referred to as a 30(b)(6) witness, or were you</p> <p>10 speaking in your individual capacity or do you know?</p> <p>11 A. I don't know.</p> <p>12 Q. And do you understand the purpose of why we're</p> <p>13 here today?</p> <p>14 A. Yes.</p> <p>15 Q. What's your understanding?</p> <p>16 A. My understanding is that you are representing</p> <p>17 the BLinC organization and would like them to be</p> <p>18 formally recognized as a student organization at the</p> <p>19 University of Iowa.</p> <p>20 Q. When you say recognized --</p> <p>21 A. Or registered. I think it's registered. I'm</p> <p>22 sorry, I've moved on.</p> <p>23 Q. That's okay. Just try not to talk over me. I</p> <p>24 know it's a pain, but I'll finish my sentence and you</p> <p>25 finish yours. So you were saying the official language</p>	<p style="text-align: right;">9</p> <p>1 A. Because Angela worked with the student conduct</p> <p>2 system.</p> <p>3 Q. Did she have any responsibility over student</p> <p>4 organizations?</p> <p>5 A. No. At that point we had -- Again, we had</p> <p>6 hired somebody who worked with student organization</p> <p>7 misconduct, but she was brand new and so wasn't really</p> <p>8 working with that system.</p> <p>9 Q. So I just want to understand. If she was over</p> <p>10 student conduct, it's my understanding there was no</p> <p>11 student misconduct involved; is that correct?</p> <p>12 A. Correct. But she -- So Angela worked with</p> <p>13 student conduct of which student organization misconduct</p> <p>14 fell under.</p> <p>15 Q. Okay. Did you have any substantive</p> <p>16 discussions with these individuals about whether BLinC</p> <p>17 should be penalized or deregistered?</p> <p>18 A. No.</p> <p>19 Q. You never spoke substantively with Dr. Nelson</p> <p>20 about this?</p> <p>21 A. No.</p> <p>22 Q. Or with Tom Baker?</p> <p>23 A. No.</p> <p>24 Q. Did Tom Baker report to you?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">10</p> <p>1 Q. And he -- Does he have direct responsibility 2 over student organizations or is he over EOD? Do you 3 know what EOD is? 4 A. Yes, I do. I don't know what Tom's 5 responsibilities are now. What they were when I was 6 there was Tom was primarily the Title IX investigation 7 for students, the Title IX investigator. 8 Q. Do you know why he was involved? 9 A. When EOD would do investigations, reports 10 typically would come to Bill -- I'm sorry, come to Tom. 11 Q. And he -- He was your liaison with the 12 Employment Opportunity Division [sic]? 13 A. I wouldn't say liaison, no. 14 Q. What was his role? 15 A. I think colleague, long-term colleague. 16 Q. So you just used him as a sounding board to 17 discuss things? I'm just trying to understand what your 18 interaction with him was. 19 A. We over -- We would review cases. We would 20 talk about students of concern. With this particular 21 matter I believe, I don't remember, I don't know, that 22 the report from EOD would have gone to both Tom and me. 23 But I don't remember that it did. 24 Q. In this instance you didn't have a sit-down -- 25 A. No.</p>	<p style="text-align: right;">12</p> <p>1 individuals over your University of Iowa email account; 2 is that correct? 3 A. If I would have, yes. 4 Q. Would you have ever used your private email or 5 your social media -- 6 A. No. 7 Q. -- or anything else like that to communicate 8 about this case? 9 A. No. 10 Q. I'm just going to ask you to wait until I 11 finish my sentence for the court reporter. 12 A. Sorry. 13 Q. Were you aware of anyone within the University 14 who opposed the decision to deregister BLinC? 15 A. No. 16 Q. Were you aware of anyone who expressed 17 concerns about potential religious liberty implications 18 within the University? 19 A. Could you restate that, please? 20 Q. Yes. Was there anyone within the University 21 who raised religious liberty concerns that might arise 22 in the decision to deregister BLinC? 23 MR. CARROLL: Other than any conversations 24 with counsel. 25 THE WITNESS: Thank you.</p>
<p style="text-align: right;">11</p> <p>1 Q. -- discussion about it? 2 A. No. 3 Q. And Dr. Anita Cory, same questions, what was 4 your interaction with her? 5 A. Very, very, very minimal. I believe later on 6 in the -- in this document I indicated that there was a 7 phone call, and I sat in on the phone call but had 8 nothing to say. 9 Q. Then you reported directly to Dr. Shivers; is 10 that correct? 11 A. Correct. 12 Q. So was your -- How involved was she in the 13 BLinC decision? 14 A. Decision, she wasn't. 15 Q. Did she discuss with you at all the merits of 16 the allegations? 17 A. Hm-um. 18 Q. Is that a yes or a no? 19 A. No. 20 Q. Turning to page 4 of Interrogatory Number 2, 21 here we asked you to identify all email addresses -- and 22 maybe this was poorly worded, but all of your email 23 addresses and social media platforms you have used to 24 communicate with anyone concerning BLinC or this 25 lawsuit. I assume that you communicated with these</p>	<p style="text-align: right;">13</p> <p>1 A. No. 2 MR. CARROLL: So just Tom Baker -- 3 A. No. 4 MR. CARROLL: -- Melissa. 5 A. Conversations that I would have had about that 6 would have been with counsel. 7 Q. Were you personally concerned about any 8 religious liberty implications that might arise from 9 deregistering BLinC? 10 A. Personally, no. 11 Q. Why not? 12 A. Because this was a professional decision. 13 Q. Did you have any professional concern about 14 deregistering BLinC? 15 A. Please tell me what you mean by concerns. 16 Q. Did it occur to you that deregistering BLinC 17 might impact their religious freedom? 18 A. No. I didn't -- I didn't think about 19 religious freedom. I thought about -- Let's see here. 20 I thought about the ramifications for BLinC and what 21 that might mean, but I didn't -- I didn't have 22 professional concerns. I made the decision based on the 23 information that I had. 24 Q. What were the ramifications you were aware of 25 or potential ramifications?</p>

<p style="text-align: right;">14</p> <p>1 A. That as a student organization, if they did 2 not abide by the human rights policy, that they would 3 not be able to be a registered student organization. 4 Q. Did it ever occur to you that asking a 5 religious student group or telling a religious student 6 group who it had to pick as its leaders might violate 7 federal or state law? 8 A. I thought of those things, and then I spoke to 9 general counsel about it. 10 Q. Just describe generally for me the extent of 11 your involvement in the decision to deregister BLinC 12 from start to finish. 13 A. The decision to deregister BLinC was not my 14 decision. So I wasn't involved with that. 15 Q. What was your involvement? 16 A. My involvement was after BLinC was 17 deregistered and it was -- the decision was appealed, 18 that appeal came to me. 19 Q. I'm going to ask you to take a look at the 20 document in front of you behind tab number 14. And do 21 you recognize this document? 22 A. Um-hm. 23 Q. What is it? 24 A. It is the registration of student 25 organizations according to the website. I don't know</p>	<p style="text-align: right;">16</p> <p>1 with what? 2 A. Meaning students being engaged, actively 3 engaged, on campus with peers, with academic 4 classifications to support their success. 5 Q. Is one of the interests of the student 6 organization policy to promote a marketplace of ideas 7 for the students to participate in? 8 A. I don't know that I can answer that fully. 9 Honestly I wasn't there long enough to know how it was 10 fully formed to begin with. So to -- I believe you said 11 to create a marketplace of ideas. I don't know what the 12 intent was. Certainly it is to provide opportunities 13 for students to gather together in areas of interest or 14 need. 15 Q. Just as the -- I'm sorry, you were assistant 16 dean of students or dean of students? 17 A. I was dean of students. 18 Q. As the dean of students would you have 19 expected -- just personally, would you have expected 20 students to engage with difficult ideas and grapple with 21 them and expand their intellectual horizon while at the 22 University? 23 A. I think that's what higher education is. 24 Q. And would you say that the student groups were 25 a part of that?</p>
<p style="text-align: right;">15</p> <p>1 what year this was. 2 Q. While you were there -- Was this the 3 registration of student organization policy that was in 4 effect while you were at the University? 5 A. It looks like it. 6 Q. And you haven't had a chance to read it; 7 correct? 8 A. Yeah. 9 Q. I understand you haven't -- 10 A. It looks like it. Although when I looked at 11 it it was always online. It was never -- 12 Q. That makes sense. 13 A. Yeah. 14 Q. Just on the first page this says that student 15 groups are separate legal entities from the University; 16 correct? 17 A. Correct. 18 Q. And that meant that they were free to form 19 around areas of interest of students; correct? 20 A. Correct. 21 Q. What's the purpose of the University 22 encouraging student groups on campus? 23 A. Student involvement, student engagement, 24 student success. 25 Q. When you say student engagement, engagement</p>	<p style="text-align: right;">17</p> <p>1 A. Could -- Some absolutely. Some probably not. 2 Q. And so if students were offended by positions 3 that another student group took, would you expect that 4 to be part of the normal process or would you be 5 concerned about offense among student groups? 6 A. I would not be concerned about offense. 7 Q. Why not? 8 A. Because we can all be offended by a number of 9 different things. 10 Q. Like you said, part of being at the University 11 is to confront those ideas and to learn from them and to 12 expand what you think; is that fair? 13 A. I didn't say that it was to confront those 14 ideas. I do believe that higher education is to be an 15 institution of learning. Part of that learning is to be 16 exposed to new ideas, different ways of thinking. 17 Q. Even if those ideas might be offensive; 18 correct? 19 A. Sure. 20 Q. I'm going to ask you to look at the document 21 in front of you that's labeled document 92, behind tab 22 92. 23 MR. CARROLL: It's over here (indicating), 24 isn't it? 25 MR. BAXTER: It should be in the second</p>

<p style="text-align: right;">18</p> <p>1 binder.</p> <p>2 MR. CARROLL: I don't have one. I have a 92</p> <p>3 tab.</p> <p>4 (Exhibit 92 was marked for identification by</p> <p>5 the reporter.)</p> <p>6 Q. And you're cc'd on this document, right, on</p> <p>7 the second page?</p> <p>8 A. Yes, I am.</p> <p>9 Q. And do you remember seeing this document</p> <p>10 before?</p> <p>11 A. Now that I'm reading it, now it looks</p> <p>12 familiar.</p> <p>13 Q. What's your understanding of what it is?</p> <p>14 A. It is notification that a student filed a</p> <p>15 complaint with the EOD.</p> <p>16 Q. In the normal course -- This is the notice of</p> <p>17 the complaint that was filed by Marcus Miller against</p> <p>18 BLinC; is that correct?</p> <p>19 A. That's what it appears to be, yes.</p> <p>20 Q. And was this the first time you would have</p> <p>21 heard about the BLinC situation?</p> <p>22 A. I believe so.</p> <p>23 Q. Were you involved in any other investigations</p> <p>24 of student organizations in the time you were there?</p> <p>25 A. I was not a part of investigating student</p>	<p style="text-align: right;">20</p> <p>1 Q. Were you involved in any of the investigation</p> <p>2 of BLinC?</p> <p>3 A. I was not.</p> <p>4 Q. What was your next involvement?</p> <p>5 A. My involvement was when the report came from</p> <p>6 Connie to our office.</p> <p>7 Q. I'm going to ask you to look at document</p> <p>8 number 94.</p> <p>9 A. Nothing there.</p> <p>10 (Exhibit 94 was marked for identification by</p> <p>11 the reporter.)</p> <p>12 A. Okay.</p> <p>13 Q. Are you familiar with that document?</p> <p>14 A. It looks familiar.</p> <p>15 Q. What is it?</p> <p>16 A. It's an email from Tom Baker.</p> <p>17 Q. And do you remember getting this email?</p> <p>18 A. Not specifically.</p> <p>19 Q. Do you see at the end of the paragraph that</p> <p>20 says, "As far as I know the University of Iowa human</p> <p>21 rights policy does not mandate an all-comers policy"?</p> <p>22 A. Yes.</p> <p>23 Q. Do you know what an all-comers policy is?</p> <p>24 A. Not the legal definition, no. My</p> <p>25 understanding of what that is is that students who want</p>
<p style="text-align: right;">19</p> <p>1 organizations. But, yes, there were other student</p> <p>2 organizations that had -- that went through our student</p> <p>3 misconduct process. I can't say because I don't know, I</p> <p>4 don't remember, if they went through an investigation</p> <p>5 through EOD.</p> <p>6 Q. So I'm going to ask you to flip back then to</p> <p>7 document number 91.</p> <p>8 (Exhibit 91 was marked for identification by</p> <p>9 the reporter.)</p> <p>10 Q. Are you familiar with that document?</p> <p>11 A. I've seen this, but I wouldn't have seen it</p> <p>12 initially, because this went to EOD.</p> <p>13 Q. So EOD would not have shared this with you?</p> <p>14 A. No. No.</p> <p>15 Q. And what was your next involvement in the</p> <p>16 investigation of BLinC; do you recall?</p> <p>17 A. If you would please tell me where we just left</p> <p>18 off on the questioning.</p> <p>19 Q. Yes.</p> <p>20 A. I'm not sure where "next" means.</p> <p>21 Q. You received -- on the document in front of</p> <p>22 you, Exhibit 92, you received from Constance Cervantes a</p> <p>23 notice that Marcus Miller had filed a complaint against</p> <p>24 Business Leaders in Christ?</p> <p>25 A. Um-hm.</p>	<p style="text-align: right;">21</p> <p>1 to be a part of something can.</p> <p>2 Q. And as far as you understood at the time, did</p> <p>3 the University of Iowa have an all-comers policy?</p> <p>4 A. You know, I don't know. I really don't.</p> <p>5 Q. Did you discuss with anyone that the</p> <p>6 University had an all-comers policy?</p> <p>7 MR. CARROLL: Other than attorneys.</p> <p>8 A. I was -- know that there was -- I believe that</p> <p>9 it was a part of that phone call where I sat in on it</p> <p>10 and didn't talk. I believe there was discussion about</p> <p>11 an all-comers policy, but I don't -- I can't</p> <p>12 definitively say it was there.</p> <p>13 Q. I'm handing you what's been marked as</p> <p>14 Exhibit 220. This is the document that is attached to</p> <p>15 the email under tab 94 that you received from Tom Baker.</p> <p>16 Do you recall reading this document?</p> <p>17 MR. CARROLL: You mean at the time of 94?</p> <p>18 A. The time of this email, getting it?</p> <p>19 Q. Correct.</p> <p>20 A. I don't recall reading it, but I'm sure I did</p> <p>21 if Tom sent it.</p> <p>22 Q. Do you see in the second paragraph where it</p> <p>23 says the policy on human rights does not prohibit</p> <p>24 student groups from establishing membership criteria?</p> <p>25 A. Hold on a minute.</p>

<p style="text-align: right;">22</p> <p>1 Q. It's the very top of the second paragraph.</p> <p>2 A. Um-hm.</p> <p>3 Q. This is a letter that was from Tom Rocklin;</p> <p>4 correct?</p> <p>5 A. Yes.</p> <p>6 Q. Who was the -- at the time of the letter was</p> <p>7 the vice president for student services and dean of</p> <p>8 students?</p> <p>9 A. Correct.</p> <p>10 Q. Is that statement consistent with your</p> <p>11 understanding of the policy at the time you were at the</p> <p>12 University of Iowa?</p> <p>13 A. I don't believe it had changed from then to</p> <p>14 later then.</p> <p>15 Q. And do you see the two -- well, two sentences</p> <p>16 down where it says, "While the human rights policy does</p> <p>17 prohibit discrimination on the basis of sexual</p> <p>18 orientation among a number of other classifications, the</p> <p>19 University is obliged to protect the First Amendment</p> <p>20 right of CLS members to espouse the group's basic</p> <p>21 tenets"?</p> <p>22 A. Um-hm.</p> <p>23 Q. Is that a yes?</p> <p>24 A. Yes.</p> <p>25 Q. As far as you know had that policy changed</p>	<p style="text-align: right;">24</p> <p>1 to me simply because of the numbers of policies at the</p> <p>2 University of Iowa.</p> <p>3 Q. When you would -- You indicated that you would</p> <p>4 have read this letter?</p> <p>5 A. I sure hope so.</p> <p>6 Q. It sounds like you would have felt bound to</p> <p>7 follow these same policies without receiving some other</p> <p>8 direction; is that correct?</p> <p>9 A. Yes.</p> <p>10 Q. Did you ever receive any other direction than</p> <p>11 to follow the guidelines in this memo?</p> <p>12 A. I spoke with counsel.</p> <p>13 Q. I'm going to ask you to look now at the</p> <p>14 document that's tabbed as 98. This is a letter dated</p> <p>15 April 12, 2017, from Hannah Thompson to Ms. Schriver</p> <p>16 Cervantes; correct?</p> <p>17 A. Yes.</p> <p>18 Q. And you were cc'd on this letter?</p> <p>19 A. Yes.</p> <p>20 Q. And do you recall receiving this letter?</p> <p>21 A. Do I recall receiving it? No.</p> <p>22 Q. Why don't you take a minute and read, skim</p> <p>23 through the letter, and let me know if you recall ever</p> <p>24 having read it or received this.</p> <p>25 A. I recall reading it. I didn't recall</p>
<p style="text-align: right;">23</p> <p>1 from the time of this letter to when you were at the</p> <p>2 University?</p> <p>3 A. I don't believe it did.</p> <p>4 Q. As the vice president for student services</p> <p>5 Tom Rocklin would have been in a position to make that</p> <p>6 determination; correct?</p> <p>7 A. He would have been, yeah, the vice president</p> <p>8 to -- The process of policy development, I believe, is</p> <p>9 more than one person at the University of Iowa. As</p> <p>10 policies are developed I know that there is a process</p> <p>11 that it goes through to be reviewed. So -- And I can't</p> <p>12 speak to what Tom had the ability or the authority to do</p> <p>13 in 2009 because I wasn't there, nor can I do that</p> <p>14 because that wasn't my job.</p> <p>15 Q. But couldn't you assume that if a university</p> <p>16 vice president writes a letter to an outside</p> <p>17 organization at the University of Iowa that they have</p> <p>18 authority to speak for the university?</p> <p>19 A. I can absolutely assume that a vice president</p> <p>20 can speak for the University.</p> <p>21 Q. If that policy had changed, would you have</p> <p>22 expected it to have been in writing somewhere or have</p> <p>23 been communicated to you?</p> <p>24 A. I would have expected it to be in writing. I</p> <p>25 probably would not have expected it to be communicated</p>	<p style="text-align: right;">25</p> <p>1 receiving it.</p> <p>2 Q. Did you read it only in preparation for this</p> <p>3 deposition?</p> <p>4 A. No. I read it before. You had asked me if I</p> <p>5 remember receiving it. I don't remember receiving the</p> <p>6 letter.</p> <p>7 Q. So you remember reading it but not receiving</p> <p>8 it?</p> <p>9 A. Correct. I remember the content.</p> <p>10 Q. So you must have received it if you read it;</p> <p>11 right?</p> <p>12 A. Absolutely.</p> <p>13 Q. When you read it, what was your reaction?</p> <p>14 A. My reaction was Hannah writes very well.</p> <p>15 Q. Do you see on the second page at the bottom of</p> <p>16 the first -- second page, the bottom of the first</p> <p>17 paragraph where Hannah states, "We never discriminate</p> <p>18 against students because of who they are. All we ask is</p> <p>19 that our leaders support and uphold our goals and</p> <p>20 beliefs"?</p> <p>21 A. Yes.</p> <p>22 Q. And then do you see the next sentence says,</p> <p>23 "BLinC is a Christian organization for students who</p> <p>24 share core Christian convictions"?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">26</p> <p>1 Q. "Mr. Miller expressly stated that he rejected 2 important parts of our Christian beliefs, would not 3 support them and would openly oppose them in public." 4 Do you see that? 5 A. Yes. 6 Q. Did you have an understanding of how the human 7 rights policy was to be interpreted? 8 A. I'm sorry. Could you ask that again? 9 Q. Sure. When a University student organization 10 was sanctioned, Dr. Nelson had -- I'm sorry, yes, was 11 sanctioned, that would have been done by Dr. Nelson you 12 indicated; correct? 13 A. Correct. 14 Q. And then any appeals would have been taken to 15 you? 16 A. Correct. 17 Q. And I assume in appealing you were to assess 18 whether Mr. Nelson had made the correct decision; is 19 that correct? 20 A. Correct. 21 Q. And to do that you would have had to 22 understand how the human rights policy operates and 23 should be interpreted; correct? 24 A. Correct. 25 Q. Is it your understanding that the University</p>	<p style="text-align: right;">28</p> <p>1 yes. 2 Q. And if there were an organization formed to 3 support transgender individuals -- 4 A. Yes. 5 Q. -- and they wanted to exclude individuals who 6 believe that transgenderism is a figment of someone's 7 imagination, they could include that individual as one 8 of their leaders; correct? 9 A. I would speak with counsel on that to get 10 their guidance. 11 Q. Why? 12 A. I think that -- Honestly I would have spoken 13 to counsel about many of those examples that you gave me 14 simply to make sure that I was upholding the human 15 rights policy as it was written and as the University 16 was living that. 17 Q. So you think it's possible that the University 18 would require a feminist organization to admit someone's 19 a leader who was antifeminist if they wanted to? 20 A. Honestly I don't know. 21 Q. And so you made a decision in the BLinC case 22 without knowing how this would apply? 23 A. I made a decision based on the written 24 information as I understood it and having consulted with 25 general counsel.</p>
<p style="text-align: right;">27</p> <p>1 student groups or students had the right to form groups 2 around common interests? 3 A. Yes. 4 Q. And that can include religious interests? 5 A. Yes. 6 Q. It could include interests about gender 7 identity? 8 A. Yes. 9 Q. Politics? 10 A. Yes. 11 Q. Social experiences like sports and music and 12 drama and the arts; correct? 13 A. Yes. 14 Q. And those -- If the Democratic party had a 15 leadership standard that you had to be a democrat and 16 affirm the principles of the Democratic party, that 17 would be acceptable under the human rights policy; 18 correct? 19 A. That's my understanding, yes. 20 Q. And the same as for the Republicans? 21 A. Yes. 22 Q. And that's true even if the Republican party 23 platform endorses marriage as an institution between a 24 man and a woman; correct? 25 A. I didn't take it that far, but I assume so,</p>	<p style="text-align: right;">29</p> <p>1 Q. So before you wrote the letter deregistering 2 BLinC -- 3 A. I did not deregister them. 4 Q. Before you wrote the letter affirming the 5 decision to deregister BLinC, you consulted with 6 counsel? 7 A. Correct. 8 Q. In your decision did you take into account the 9 statements that Ms. Thompson made in her letter? 10 A. I know I read this, and what I did was I 11 reviewed all of the information that I had. 12 Q. And was this letter among that? 13 A. Yes. 14 Q. And would it have made a difference to you if 15 BLinC had denied Marcus Miller a leadership position 16 simply because he was gay as opposed to if they had 17 deregistered him because he disagreed with their 18 religious beliefs about sexuality and marriage? 19 MR. CARROLL: You used the term deregistered 20 Mr. Miller. 21 Q. I thought I corrected to say denied him a 22 leadership position. 23 A. Okay. 24 Q. BLinC denied Mr. Miller a leadership position; 25 correct?</p>

<p style="text-align: right;">30</p> <p>1 A. Correct.</p> <p>2 Q. Would it make a difference to you in making</p> <p>3 your decision on the appeal of BLinC's deregistration if</p> <p>4 BLinC had denied him a position because he was gay</p> <p>5 versus because he disagreed with the organization's</p> <p>6 religious beliefs about sexuality and marriage?</p> <p>7 A. I don't know that I can answer that. What I</p> <p>8 can say is I remember reading that he was denied a</p> <p>9 position because he was gay. So that's what I reviewed.</p> <p>10 Q. Well, just hypothetically if he had claimed</p> <p>11 that he was denied a position because he disagreed with</p> <p>12 their beliefs about marriage and sexuality, would that</p> <p>13 have changed your position?</p> <p>14 A. I do not know. It's hard to deal with</p> <p>15 hypotheticals.</p> <p>16 Q. So you think it's possible that it's okay for</p> <p>17 the University to tell a religious group that they can't</p> <p>18 consider religious beliefs in selecting their leaders?</p> <p>19 A. Sorry. Tell me again.</p> <p>20 Q. Do you think it would ever be okay for the</p> <p>21 University of Iowa to tell a religious student group</p> <p>22 that it cannot consider religion in selecting its</p> <p>23 leaders?</p> <p>24 A. No.</p> <p>25 Q. Why not?</p>	<p style="text-align: right;">32</p> <p>1 A. Certainly.</p> <p>2 Q. Did you ever read -- I'm going to ask you to</p> <p>3 look at the document behind number 106.</p> <p>4 A. Yes.</p> <p>5 Q. Are you familiar with this document?</p> <p>6 A. Yes.</p> <p>7 Q. What is it?</p> <p>8 A. This is Connie's findings on the complaint.</p> <p>9 Q. And did you read this carefully --</p> <p>10 A. Yes.</p> <p>11 Q. -- at the time you received it?</p> <p>12 A. Yes.</p> <p>13 Q. Did you ever receive any draft findings?</p> <p>14 A. Not that I recall, no.</p> <p>15 Q. So as far as you recall is this the first</p> <p>16 information you would have received about BLinC after</p> <p>17 receiving Connie's first notice of the complaint?</p> <p>18 A. Yes.</p> <p>19 Q. On page 2 you see under subheading 4 --</p> <p>20 A. Yes.</p> <p>21 Q. -- there's a subheading Remedy Requested and</p> <p>22 Allegations and Responses. This would have been --</p> <p>23 student B would have referred to the representative from</p> <p>24 BLinC. And you see here it says that "student B admits</p> <p>25 that because of complainant's desire to pursue a</p>
<p style="text-align: right;">31</p> <p>1 A. Because that's their belief.</p> <p>2 Q. And that belief is protected by the First</p> <p>3 Amendment; right?</p> <p>4 A. Yes.</p> <p>5 Q. And you know that as an individual?</p> <p>6 A. Yes.</p> <p>7 Q. And if you thought the University was doing</p> <p>8 that, you would try to stop them; right?</p> <p>9 A. I hope so. Yes.</p> <p>10 Q. And if you thought there was a possibility</p> <p>11 they were doing that, that would raise red flags in your</p> <p>12 mind that the University should be very cautious?</p> <p>13 A. Yes.</p> <p>14 Q. In fact, you were cautious about that as you</p> <p>15 spoke to counsel; correct?</p> <p>16 A. Correct.</p> <p>17 Q. And that's the reason you went to counsel?</p> <p>18 A. Not entirely. I would say that just going to</p> <p>19 counsel as a normal way of being at the University of</p> <p>20 Iowa is how I was operating. So it wasn't just to be</p> <p>21 cautious, it was to inform.</p> <p>22 Q. But protecting the University's interests --</p> <p>23 or, yeah, ensuring that the University is in compliance</p> <p>24 with federal law was certainly one of those interests;</p> <p>25 correct?</p>	<p style="text-align: right;">33</p> <p>1 homosexual relationship he was denied a leadership</p> <p>2 position in BLinC"; correct?</p> <p>3 A. Actually it says desire to pursue a homosexual</p> <p>4 lifestyle/relationship.</p> <p>5 Q. Correct, desire to pursue a homosexual</p> <p>6 lifestyle, slash, relationship.</p> <p>7 A. Um-hm.</p> <p>8 Q. And on the second page -- on page 3 if you</p> <p>9 flip one more page over there's a paragraph that's</p> <p>10 indented there in the middle of the page. Do you see</p> <p>11 that?</p> <p>12 A. Yes.</p> <p>13 Q. It says, "First and foremost the reason why</p> <p>14 I" -- referring to student B, or Hannah Thompson --</p> <p>15 "made the decision that I could not allow you to be in a</p> <p>16 leadership position within BLinC is because of your</p> <p>17 desire to pursue a homosexual lifestyle/relationship";</p> <p>18 correct?</p> <p>19 A. Correct.</p> <p>20 Q. Did -- In this reading of any of those</p> <p>21 statements did it ever occur to you that</p> <p>22 Hannah Thompson's statements were based on religious</p> <p>23 belief?</p> <p>24 A. I'm sure I assumed that.</p> <p>25 Q. I ask you to flip over to the document tabbed</p>

<p style="text-align: right;">34</p> <p>1 number 108. This is a memo dated July 2017 from 2 Tom Baker to Bill Nelson, and you're cc'd on that; 3 correct? 4 A. Correct. 5 Q. Do you remember receiving this email or this 6 memo? 7 A. Yes. 8 Q. Do you remember reading it -- 9 A. Yes. 10 Q. -- at the time you -- in July of 2017? 11 A. Yes. 12 Q. And do you see in the middle of the second 13 paragraph it says, section 5B of the student policy, 14 quote, "calls upon the executive director of the IMU to 15 schedule a time to meet and discuss the case with the 16 student organization representatives before determining 17 whether or not the actions of BLinC's student leaders 18 violated one or more of the ten established rules for 19 student organizations"? 20 A. Yes. 21 Q. Do you know if that meeting took place? 22 A. I believe it did. I believe there were -- 23 Dr. Nelson reached out, I think, a few times. I believe 24 the meeting happened. I don't know that it did. 25 Q. You didn't participate in it directly?</p>	<p style="text-align: right;">36</p> <p>1 Q. I ask you to look at the document tabbed 2 number 109. Do you recognize -- This is a document 3 dated July 14. It's a letter from Jacob Estell to you. 4 Do you recognize this document? 5 A. I do. 6 Q. Do you remember receiving it? 7 A. I do. 8 Q. Did you read it? 9 A. Yes, I did. 10 Q. And do you recall what the content was 11 generally? 12 A. It was Jacob responding to the findings. 13 Q. What was his response, do you remember, or 14 should we walk through it? Let me direct your attention 15 to the second paragraph. It starts "first". If you 16 move down to about the middle there's a sentence that 17 says, "The student participated in BLinC before asking 18 for a leadership position and remains welcome to 19 participate even as a leader regardless of his sexual 20 orientation. The student was not eligible to be a 21 leader of BLinC only because he stated that he disagrees 22 with and would not try to live by BLinC's Christian 23 principles which means he could not effectively lead our 24 group." Do you remember reading that? 25 A. I do.</p>
<p style="text-align: right;">35</p> <p>1 A. No. 2 Q. Is it your understanding from this letter that 3 at that meeting Bill Nelson should have been assessing 4 whether the findings were fair and accurate? 5 A. Yes. 6 Q. And that was a process, I assume, to ensure 7 that students have an opportunity to contest whatever 8 the findings were; is that correct? 9 A. I'm sure it was an opportunity for there to be 10 an open dialogue about what was happening and what was 11 expected. 12 Q. Are you aware of any other review process from 13 the EOD findings for reviewing the investigator's 14 conclusions? 15 A. No, I'm not. 16 Q. As far as you're aware, having this meeting, 17 having it reviewed by Bill Nelson and having you review 18 Bill Nelson, that is the appeal process for students to 19 challenge investigative findings? 20 A. I believe so, and of course there's another 21 appeal to the Board of Regents. 22 Q. And it would be important in that process then 23 for students to be fully heard and for their views to be 24 considered; correct? 25 A. Yes.</p>	<p style="text-align: right;">37</p> <p>1 Q. Did that cause any concerns to you about what 2 was in the finding from Ms. Cervantes? 3 A. I read that, and I went back and reviewed the 4 findings from Connie. And the email -- I believe it was 5 an email from Hannah or maybe it was that letter from 6 Hannah where she said that he was going to pursue a 7 homosexual lifestyle/relationship, but also in the 8 findings where Connie had said that was not accurate. 9 Q. So you just accepted her word on that? 10 A. I tried to look at the whole picture. 11 Q. And all you had -- Let's look back at 106. 12 A. Okay. 13 Q. I'm on page 1 at the very bottom. It says, 14 "The following documents were reviewed." These would 15 have been documents that were reviewed by Ms. Cervantes; 16 correct? 17 A. Correct. 18 Q. And that included a copy of Facebook Messenger 19 notes and meeting dates between Mr. Miller and 20 Ms. Thompson; correct? 21 A. I believe so. 22 Q. Did you review those Facebook Messenger notes? 23 A. I did not see those. 24 Q. Did you receive the May 17th, 2016, email from 25 Marcus Miller to Hannah Thompson?</p>

<p style="text-align: right;">38</p> <p>1 A. I don't know that I have that. 2 Q. Do you remember receiving that? 3 A. I don't remember. 4 Q. Did you -- Do you remember the June 22nd, 5 2017, email from Hannah to Marcus that's listed there? 6 A. I don't know. 7 Q. Did you review the constitution of Business 8 Leaders in Christ? 9 A. I did. 10 Q. On the next page do you see where it says 11 "chronology prepared by student B", which would have 12 been Hannah Thompson, the third bullet point? 13 A. Um-hm. 14 Q. Did you review that? 15 A. Honestly I don't remember that one. 16 Q. And then it says "vision meeting". Do you 17 remember that at all? 18 A. No, I don't. 19 Q. Don't you think it would have been important 20 to -- These are communications between Mr. Miller who is 21 the complainant and Ms. Thompson who is the leader of 22 BLinC. Don't you think it would have been important to 23 understand what happened between the two of them? 24 A. Yes. Although I thought I had a clear 25 understanding based on the investigation.</p>	<p style="text-align: right;">40</p> <p>1 the reporter.) 2 Q. This is a series of emails between 3 Marcus Miller and Hannah Thompson concerning the 4 decision not to select him as the leader. Just let me 5 know if you have seen this document, if that's familiar 6 to you, or the emails in it. 7 A. I don't recall this. 8 Q. So this would confirm that you didn't ask for 9 any of the underlying documents that Connie relied on in 10 making her decision; correct? 11 A. Correct. 12 Q. A minute ago we were looking at the document 13 109. That was the letter from Jacob Estell to you dated 14 July 14; correct? 15 A. Yes. 16 Q. If you flip over to tab 110 this is an email 17 you sent the same day to Bill Nelson and Tom Baker; 18 correct? 19 A. Um-hm. 20 Q. Its subject is letter of appeal. At the 21 bottom this was forwarding basically the letter that 22 Jacob had sent you; correct? 23 A. Yes. 24 Q. In the third line you say, "I can guess how he 25 saw the report which precipitated this letter, but that</p>
<p style="text-align: right;">39</p> <p>1 Q. Even though you're the only review process and 2 have the final word, you didn't ask to see any of the 3 underlying documents that Ms. Cervantes considered? 4 A. I did not ask. 5 Q. And you didn't ask even though you had -- you 6 knew this implicated religious liberty concerns and that 7 could potentially expose the University to liability; 8 correct? 9 A. That's where I talked to general counsel. 10 Q. But you didn't ask to look at any of the 11 underlying documents? 12 A. I did not. 13 Q. I'm going to ask you to take a look at the 14 document that's labeled number 88 in your tab. You may 15 not have that. 16 (Exhibit 88 was marked for identification by 17 the reporter.) 18 Q. Have you seen this document before? 19 A. No. 20 Q. Have you seen the messages that are on the 21 document? 22 A. No. 23 Q. I'm going to show you a document that's being 24 marked as Exhibit Number 90. 25 (Exhibit 90 was marked for identification by</p>	<p style="text-align: right;">41</p> <p>1 doesn't really matter." 2 A. Um-hm. 3 Q. What report were you referring to? 4 A. I believe it would have been Connie's report. 5 Q. But he would have seen that, right, because it 6 was sent to him? 7 A. I assume so, yes. 8 Q. So why would you be questioning why he had it? 9 A. Honestly I don't know. I don't remember 10 sending this. I mean, I did, but . . . 11 Q. You don't remember what report you -- 12 A. I don't. 13 Q. I'm going to have you flip over to 14 document 111. Is this your handwriting? 15 A. No. 16 Q. Do you recall being in a meeting on July 14 17 with Bill, Tom, Nate, Bill Nelson, Anita Cory and so 18 forth? 19 A. I remember being in lots of meetings with Nate 20 and Tom. Sometimes Bill was there. 21 Q. Who is Nate? 22 A. Nate Levin. 23 Q. Who is Nate Levin? 24 A. General counsel. 25 Q. General counsel for the University?</p>

<p style="text-align: right;">42</p> <p>1 A. He works in the general counsel's office, yes. 2 He is the student affairs kind of contact. 3 Q. It says here, "Letter re sanctions will come 4 from Bill or JT Timmons". Who is JT Timmons? 5 A. JT Timmons is -- I believe his title is 6 assistant vice president for student affairs and 7 director of wellness, something. And so if there are 8 student organizations that go through our -- the student 9 organization misconduct process, it would either -- the 10 decision of those would either come from Bill or from JT 11 depending on where those organizations fall. 12 Q. Is it possible that this is the handwriting of 13 Ms. Cervantes? 14 A. I have no idea. 15 Q. Do you know what she refers to when she says 16 "waited on sanctions until 24:7"? 17 A. No, I don't. I don't know what this is. 18 Q. Do you know what 24:7 is? 19 A. There was a student organization at Iowa 20 called 24:7. 21 Q. Were you aware that they were being 22 investigated at the same time as BLinC? 23 A. Yes. 24 Q. Did you have any participation in that 25 process?</p>	<p style="text-align: right;">44</p> <p>1 A. No, I don't. 2 Q. Did Bill report to you about the meeting that 3 took place on September 1st when he and Tom Baker met 4 with representatives of BLinC? 5 A. I know I had a -- he told me generally that 6 they met and I believe had a good discussion, but I 7 didn't ask nor -- I don't know that I was given -- I 8 didn't ask for any details. 9 Q. So you wouldn't know anything about the 10 substance of that meeting? 11 A. Not -- Certainly I don't remember anything 12 now. 13 Q. Do you remember if he told you that BLinC 14 stated in that meeting that its policy was to allow 15 everybody to join as a member? 16 A. I don't recall. 17 Q. Do you recall if he told you that their policy 18 was they only had selection requirements for their 19 leaders? 20 A. It sounds familiar. 21 Q. And do you remember if he told you that their 22 only selection standards were affirmation of the 23 organization's religious beliefs? 24 A. I don't remember. It -- I just don't 25 remember.</p>
<p style="text-align: right;">43</p> <p>1 A. I did not. 2 Q. Did you ever receive findings? 3 A. I believe I had a report sent to me. 4 Q. Okay. I'm going to ask you to look at 5 document number 113. 6 (Exhibit 113 was marked for identification by 7 the reporter.) 8 Q. This is an email from you to Bill Nelson 9 following up on a request from Marcus Miller for a 10 meeting; is that correct? 11 A. Yes. 12 Q. And you asked Bill to respond to Marcus? 13 A. I did. 14 Q. Do you know if that happened? 15 A. I believe he did. 16 Q. Did he report to you about it? 17 A. He reported to me about a lot of things. So 18 Bill is wonderful at reaching out to students. So I 19 believe he did. 20 Q. Do you recall anything that came of that 21 meeting? 22 A. I don't know. I know that I -- I was not a 23 part of a meeting. 24 Q. You don't remember being -- you don't remember 25 anything specific about a report coming down to you?</p>	<p style="text-align: right;">45</p> <p>1 Q. If you don't remember, that's fine. I just 2 want to ask you if it triggers your memory. That's 3 fine. 4 A. Yeah. 5 Q. Do you remember if he told you that persons 6 who identified as gay or lesbian would be welcome to be 7 leaders in the organization as long as they ascribe to 8 the organization's religious beliefs? 9 A. That I don't recall. 10 Q. Would that have been important to you to know 11 that? 12 A. Because in the findings that was one of 13 those -- in Connie's reports that was one of the 14 sticking points of -- Connie said that it did not come 15 out in the investigation that he wanted to be -- pursue 16 a homosexual relationship or something. 17 Q. So it would have been important to you to know 18 that kind of information? 19 A. Correct. 20 Q. And did he report to you that he told -- he 21 and Tom Baker told BLinC that if that were true that 22 they could continue to be a registered student 23 organization? 24 A. I know that there was discussion about whether 25 it was -- basically what they would need to do to</p>

<p style="text-align: right;">46</p> <p>1 ascribe to the statement on human rights and remain as a 2 registered student organization. So, yes, that sounds 3 familiar. 4 Q. You would agree then that if all of those 5 things I said were true, that everybody could be 6 admitted as a member of BLinC, only leaders would have 7 to sign a statement of faith and that was the only 8 leadership restriction, that people who identified as 9 gay and lesbian could be leaders if they signed that 10 statement, you would agree that that organization should 11 then be entitled to be a registered student 12 organization? 13 A. I would. 14 Q. And it would have been important for you to 15 know that information from Tom Baker before you made 16 your decision? 17 A. I think that would have been helpful. 18 Q. Did he tell you that when he left he told the 19 representatives of BLinC that he thought they were 20 outstanding representatives of the University? 21 A. When who left? 22 Q. Sorry. When Tom Baker left the meeting did he 23 report to you that his impressions of the students were 24 that he thought they were outstanding representatives of 25 the University or something similar to that?</p>	<p style="text-align: right;">48</p> <p>1 reviewed the evidence? 2 A. Yes. 3 Q. Including the evidence that Ms. Cervantes 4 looked at in making her findings? 5 A. Yes. 6 Q. And then do you see the preceding paragraph, 7 paragraph number 2, the last sentence says, "After 8 further discussion you stated your organization intended 9 to comply with the University of Iowa human rights 10 policy at all times in the future"; correct? 11 A. Correct. 12 Q. And that's consistent with what I told you 13 happened in the meeting; correct? 14 A. Yes. 15 Q. And then he says at the end that he wants, you 16 know, I'm paraphrasing, but he will allow them to 17 continue to function if they, one, commit to ongoing 18 compliance with the University of Iowa human rights 19 policy at all times in the future; right? 20 A. Correct. 21 Q. And he's already said in the letter they had 22 already agreed to do that? 23 A. Um-hm. 24 Q. So that should not have been an impediment to 25 their being registered?</p>
<p style="text-align: right;">47</p> <p>1 A. Something similar, yes. 2 Q. So did he tell you that? 3 A. Yes. 4 Q. Do you remember what your reaction was to 5 that? 6 A. It didn't surprise me. 7 Q. Did it heighten your concern that perhaps the 8 findings didn't properly address the religious liberty 9 implications? 10 A. No. 11 Q. I'm going to ask you to look at document 12 number 114. This is a letter from Bill Nelson after the 13 September 1 meeting dated September 13 to Jacob Estell. 14 You're not cc'd on this letter. Did you ever receive a 15 copy? 16 A. I'm sure I did. 17 Q. You think Bill would have given it to you or 18 someone? 19 A. Somebody would have. 20 Q. You see where it says -- In the third 21 paragraph the last sentence it says, "I find there is a 22 preponderance of evidence that BLinC violated the 23 University of Iowa human rights policy"? 24 A. Yes. 25 Q. Would you assume from that statement Bill</p>	<p style="text-align: right;">49</p> <p>1 A. Correct. 2 Q. The second one says, "Submit a basic list of 3 qualifications for leaders of your organization designed 4 to prevent future disqualifications based on protected 5 categories and to ensure that persons who identify as 6 nonheterosexuals are not categorically eliminated from 7 consideration." 8 Do you agree that if a student organization 9 agrees to accept anyone as its leaders including someone 10 who identifies as a nonheterosexual as long as they 11 affirm the statement of faith, that that would prevent 12 categorical elimination of students because of their 13 status or sexual orientation? 14 A. I believe it would. 15 Q. Then the third statement was, "Submit an 16 acceptable plan for ensuring that group officers who 17 interview leaders will ask questions relevant to the 18 vision statement that are not presumptive of candidates 19 based upon their sexual orientation." Do you think that 20 asking students to simply sign a statement of faith 21 would avoid being presumptive about that candidate's 22 sexual orientation? 23 A. Probably. 24 Q. If BLinC had done those things I just 25 described they should have remained a student</p>

<p style="text-align: right;">50</p> <p>1 organization; is that correct?</p> <p>2 A. Correct.</p> <p>3 Q. I'm going to ask you to look at -- I'm sorry,</p> <p>4 do you want to take a break?</p> <p>5 A. No, I'm good.</p> <p>6 Q. I'm just going to ask you not to talk to your</p> <p>7 counsel --</p> <p>8 A. Oh.</p> <p>9 Q. -- quietly unless you want to take a break.</p> <p>10 Just ask to take a break.</p> <p>11 A. I had no idea.</p> <p>12 Q. That's okay. I didn't tell you.</p> <p>13 MR. CARROLL: She said she didn't like you.</p> <p>14 MR. BAXTER: I know.</p> <p>15 THE WITNESS: I did not say that. I did not</p> <p>16 say that.</p> <p>17 Q. If you want -- Would you like to take a break?</p> <p>18 I'm just offering.</p> <p>19 A. No.</p> <p>20 Q. Okay. I'm going to ask you to turn to the</p> <p>21 document behind tab 115. This is an email from me to</p> <p>22 Bill Nelson saying that a copy of BLinC's revised</p> <p>23 constitution is attached. You're not cc'd on here, but</p> <p>24 did you ever receive a copy of BLinC's revised</p> <p>25 constitution?</p>	<p style="text-align: right;">52</p> <p>1 were or if you from anyone else or any other way learned</p> <p>2 what the revisions were, I'd like to know what that</p> <p>3 revision was.</p> <p>4 A. Specifically, no. I don't recall specific</p> <p>5 revisions.</p> <p>6 Q. Okay. Anything you learned about the -- I'll</p> <p>7 leave it right there. I'm going to ask you to look at</p> <p>8 article 3 of the revised constitution, section 1. It's</p> <p>9 on document page 3553. Do you see it says, I'm going to</p> <p>10 read a little bit, "All officers are required to affirm</p> <p>11 that they accept and seek to live BLinC's religious</p> <p>12 beliefs as set forth in a statement of faith attached as</p> <p>13 Exhibit A"? Is there any violation of the human rights</p> <p>14 policy by requiring -- when a student group requires its</p> <p>15 leaders to affirm a statement of faith?</p> <p>16 A. I don't believe so.</p> <p>17 Q. And then it says at the very end of that page</p> <p>18 and going on the next, "They must be prepared to provide</p> <p>19 spiritual leadership for the organization, including</p> <p>20 leading prayer and Bible study", and goes on to describe</p> <p>21 other religious leadership requirements. Do you see</p> <p>22 that?</p> <p>23 A. Yes.</p> <p>24 Q. And there's nothing wrong under the human</p> <p>25 rights policy with a religious student group requiring</p>
<p style="text-align: right;">51</p> <p>1 A. I don't remember that I received the revision,</p> <p>2 but I know that there was that communication. So I'm</p> <p>3 not --</p> <p>4 Q. Go ahead.</p> <p>5 A. I'm not saying I didn't, I just don't</p> <p>6 remember.</p> <p>7 Q. Understood. I'm going to ask you to look at</p> <p>8 document number 116. This is a revised copy of -- the</p> <p>9 updated copy of the BLinC constitution that was</p> <p>10 submitted to Bill Nelson. Does this trigger any memory</p> <p>11 of whether you reviewed it or not?</p> <p>12 A. It does not.</p> <p>13 Q. Did anybody ever talk to you about what</p> <p>14 changes were made to the constitution?</p> <p>15 A. Specific changes, not that I recall. I do</p> <p>16 know I was in a meeting with Bill Nelson, Tom Baker and</p> <p>17 Nate Levin who is representing general counsel. I</p> <p>18 remember there was a conversation about -- about</p> <p>19 revisions.</p> <p>20 Q. Did you ever gain your own understanding of</p> <p>21 what the revisions were?</p> <p>22 A. In that meeting?</p> <p>23 MR. CARROLL: We're not going to --</p> <p>24 Q. I don't want you to tell me anything that the</p> <p>25 lawyers said. If anybody else told you what the changes</p>	<p style="text-align: right;">53</p> <p>1 its leaders to satisfy these expectations?</p> <p>2 A. Correct.</p> <p>3 Q. Then I ask you to flip over to the page</p> <p>4 labeled 3555 at the bottom. And the very last paragraph</p> <p>5 says, section 3, "All nominees must be interviewed by</p> <p>6 the president or at the president's discretion by</p> <p>7 another executive officer. Nominees must affirm that</p> <p>8 they accept and seek to live BLinC's religious beliefs</p> <p>9 as set forth in article 3, paragraph 1 of its</p> <p>10 constitution. If elected, a nominee must sign a copy of</p> <p>11 BLinC's statement of faith."</p> <p>12 There's nothing that would -- including this</p> <p>13 leadership selection process, would not violate the</p> <p>14 human rights policy; is that correct?</p> <p>15 A. It doesn't seem like it. However, not having</p> <p>16 read or reviewed this closely, going back to the</p> <p>17 previous conversation that we've had about living</p> <p>18 BLinC's religious beliefs versus kind of signing a</p> <p>19 statement of faith, so I don't know in terms of what's</p> <p>20 on paper what somebody would sign and how this aligns</p> <p>21 with that statement, if I'm making those connections.</p> <p>22 Q. Let me clarify a little bit.</p> <p>23 A. Okay.</p> <p>24 Q. So you agree that there's no problem under the</p> <p>25 human rights policy with a student group having its</p>

<p>54</p> <p>1 leaders sign a statement of faith; is that correct?</p> <p>2 A. Correct.</p> <p>3 Q. And you have questions about whether they</p> <p>4 could, for example, disqualify someone if they signed</p> <p>5 the statement but didn't actually follow it; is that</p> <p>6 correct?</p> <p>7 A. No. I'm sorry. What I was trying to say was</p> <p>8 not having everything laid out in front of me and not</p> <p>9 knowing all of the revisions, if that's what we're</p> <p>10 talking about here, that were made, I don't know if this</p> <p>11 aligns with what we had talked about earlier.</p> <p>12 Q. I understand now. I understand what you're</p> <p>13 saying.</p> <p>14 A. Thank you.</p> <p>15 Q. From what you've read of the policy, none of</p> <p>16 it would violate the -- of what you've read of the</p> <p>17 constitution, none of it would violate the human rights</p> <p>18 policy; is that correct?</p> <p>19 A. Not according to my interpretation.</p> <p>20 Q. And then -- So it would have been important to</p> <p>21 know if these were the procedures that BLinC was</p> <p>22 proposing in its constitution; correct?</p> <p>23 A. Correct.</p> <p>24 Q. I'm going to ask you to flip a couple more</p> <p>25 pages over. You'll see where it says Exhibit A to the</p>	<p>56</p> <p>1 A. No.</p> <p>2 Q. Then it says, "We believe God's intention for</p> <p>3 a sexual relationship is to be between a husband and a</p> <p>4 wife in a lifelong covenant of marriage." Does</p> <p>5 including that statement in the student constitution</p> <p>6 pose any problems in the human rights policy?</p> <p>7 A. Not that I'm aware of.</p> <p>8 Q. Does requiring leaders to sign a statement</p> <p>9 affirming that belief pose any problems under the human</p> <p>10 rights policy?</p> <p>11 A. I don't think so.</p> <p>12 Q. The next sentence says, "Every other sexual</p> <p>13 relationship beyond this is outside of God's design and</p> <p>14 is not in keeping of God's original plan for humanity."</p> <p>15 Do you believe that including that sentence in a student</p> <p>16 organization constitution poses any problems under the</p> <p>17 human rights policy?</p> <p>18 A. No.</p> <p>19 Q. And then the last one I want to read is the</p> <p>20 sentence that says, "We believe that every person should</p> <p>21 embrace, not reject, their God-given sex." Does</p> <p>22 including that sentence in a registered student</p> <p>23 organization's constitution pose any problems under the</p> <p>24 human rights policy?</p> <p>25 A. I don't know. And I say that because I don't</p>
<p>55</p> <p>1 constitution. This is the BLinC statement of faith that</p> <p>2 they ask their leaders to sign. I'm going to draw your</p> <p>3 attention to the last paragraph. I'll represent for</p> <p>4 purposes of this deposition that this was the only</p> <p>5 change made to the statement of faith --</p> <p>6 A. Okay.</p> <p>7 Q. -- was adding this paragraph. Do you have any</p> <p>8 reason to dispute that?</p> <p>9 A. Do I? No.</p> <p>10 Q. So it says, "Doctrine of personal integrity.</p> <p>11 All Christians are under obligation to seek to follow</p> <p>12 the example of Christ in their own lives and human</p> <p>13 society." Is there any problem posed under the human</p> <p>14 rights policy by including that statement of faith or</p> <p>15 asking their leaders to sign it?</p> <p>16 A. According to my interpretation, no.</p> <p>17 Q. Then it says, "In the spirit of Christ,</p> <p>18 Christians should oppose racism, every form of greed,</p> <p>19 selfishness and vice, all forms sexual immorality,</p> <p>20 including pornography." Does including that sentence in</p> <p>21 a student's group constitution pose any problems under</p> <p>22 the human rights policy?</p> <p>23 A. I don't believe so.</p> <p>24 Q. Does requiring leaders to affirm that</p> <p>25 statement pose any problems?</p>	<p>57</p> <p>1 work at Iowa anymore. I'm not well-versed in the human</p> <p>2 rights policy. So as I think about what we're wanting</p> <p>3 to protect as it relates to gender identity, I don't</p> <p>4 know.</p> <p>5 Q. Is religious belief one of the things that the</p> <p>6 University also wants to protect?</p> <p>7 A. I think so, yes. I think so.</p> <p>8 Q. And this is a statement of belief; correct?</p> <p>9 "We believe that every person should embrace, not</p> <p>10 reject, their God-given sex."</p> <p>11 A. Yes.</p> <p>12 Q. Is there any problem under the human rights</p> <p>13 policy --</p> <p>14 A. As far as I --</p> <p>15 Q. I'm sorry. We both interrupted each other.</p> <p>16 You were the person -- At the time that this</p> <p>17 constitution was submitted you were the person who was</p> <p>18 responsible to apply the human rights policy with</p> <p>19 respect to BLinC; correct?</p> <p>20 A. Correct.</p> <p>21 Q. You would have been expected to have an</p> <p>22 understanding of what the human rights policy meant?</p> <p>23 A. Correct.</p> <p>24 Q. And as you understood the policy at that time,</p> <p>25 did you believe that it violated the human rights policy</p>

<p style="text-align: right;">58</p> <p>1 for a registered student organization to include in its 2 constitution a statement of belief like this concerning 3 gender identity? 4 A. To include a statement, no. 5 Q. Did it pose any problem for them to ask their 6 leaders to sign that statement? 7 A. No. 8 Q. So if you -- If these were the only changes to 9 BLinC's constitution, the ones that we've discussed 10 today, you believe that BLinC should have remained a 11 registered student organization on campus; correct? 12 A. Based on conversation with general counsel -- 13 Q. Outside the communications with general 14 counsel, if you had known everything that we just talked 15 about concerning the revised constitution as you 16 understood the policy, do you believe that they should 17 have been allowed to remain a student organization? 18 A. Yes. 19 Q. And the only reason why you didn't allow them 20 to remain a student organization was because of 21 couns- -- or because of what you heard from general 22 counsel? 23 A. The reason is it was my decision to uphold 24 Dr. Nelson's decision, but I based that decision in part 25 on general counsel.</p>	<p style="text-align: right;">60</p> <p>1 effect of disqualifying certain individuals from 2 leadership positions based on sexual orientation or 3 gender identity." Do you see that? 4 A. Yes. 5 Q. Now you've had a chance to review the revised 6 constitution; correct? 7 A. Um-hm. 8 Q. I've only reviewed portions with you; correct? 9 A. Correct. 10 Q. Assuming those are the relevant portions, do 11 you think this statement is accurate? 12 A. Based on this dialogue here, no. Based on 13 other conversations in the office with general counsel, 14 yes. 15 Q. So based on everything you've learned today 16 about what the constitution says, you think this is a 17 false statement? 18 A. I believe that this statement could have more 19 information in it to make it more clear as to what is 20 expected or what was expected. 21 Q. But if BLinC's constitution -- revised 22 constitution is as we have described it during our 23 discussion, do you agree that it would be a mistake 24 to -- Well, you've already said you agreed it would be a 25 mistake to deregister BLinC. Do you believe that</p>
<p style="text-align: right;">59</p> <p>1 Q. I'm going to ask you to look at document 118. 2 This is the October 19 letter that you wrote to 3 Jacob Estell affirming Dr. Nelson's sanctions decision; 4 correct? 5 A. No, 118 is the letter that Bill wrote. 6 Q. The date on that? 7 A. October 19. 8 Q. I'm sorry. Were you -- You were not cc'd on 9 this letter; correct? 10 A. No. 11 Q. Do you remember receiving this letter? 12 A. At some point I know I did. 13 Q. Do you see where it says -- I'm sorry, did you 14 say that you did receive this letter? 15 A. I'm sure I did. 16 Q. You would have reviewed it? 17 A. When it came in, yes. 18 Q. As part of making your decision, would you 19 have reviewed this letter? 20 A. Yes. 21 Q. And you see in the first paragraph where it 22 says, the second sentence, "The statement of faith on 23 its face does not comply with the University's human 24 rights policy since its affirmation, as required by the 25 constitution for leadership positions, would have the</p>	<p style="text-align: right;">61</p> <p>1 requiring individuals to sign a statement of faith that 2 God's intention for sexuality is between a man and a 3 woman on its face violates the human rights policy? 4 A. Personally or professionally? 5 Q. Well, you were the person who was responsible, 6 right, to interpret? 7 A. Um-hm. 8 Q. In your role as the dean, what did you think? 9 A. On its face I believe it violated the human 10 rights policy. 11 Q. Your belief is that a student inclusion of a 12 statement of faith -- 13 MR. BAXTER: Can we go back to where I read 14 from document 116, the statement about we believe God's 15 intention? 16 (Requested portion of record was read.) 17 Q. We just reviewed your earlier statements about 18 the expressions of belief that are included in the 19 constitution; correct? 20 A. Correct. 21 Q. And you stated then that you thought there was 22 no problem under the human rights policy to include 23 those statements? 24 A. I stated I don't think so. Correct. 25 Q. Are you now saying that you believe those on</p>

<p style="text-align: right;">62</p> <p>1 their face do not comply with the University's human 2 rights policy? 3 A. No. No. 4 Q. What are you saying? 5 A. I don't know. 6 Q. There's a conflict here; correct? 7 A. Oh, my gosh, yes. 8 Q. You agree that if the University were telling 9 student groups what kind of beliefs they could put in 10 their constitution that would violate the First 11 Amendment; correct? 12 A. Correct. 13 Q. And you would want to know that before you 14 made a decision about deregistering BLinC; correct? 15 A. I didn't deregister, but yes. 16 Q. But your decision had the final impact -- 17 A. To uphold. 18 Q. -- of upholding the deregistration; correct? 19 A. Yes. 20 Q. And in your role as the dean you would have 21 believed that a religious student organization could 22 require its leaders to affirm their belief even if those 23 beliefs were offensive to others; correct? 24 A. Correct. 25 Q. If there's -- Are there any Muslim groups on</p>	<p style="text-align: right;">64</p> <p>1 A. I believe so, yes. 2 Q. Creed would include any philosophy whether it 3 was religious or not; correct? 4 A. My understanding of what creed means, yes. 5 Q. I'm going to ask you to look at document 37. 6 Could you just flip through that and get a sense of what 7 that document is? 8 A. It looks like it is a presentation that 9 somebody from EOD gave. 10 Q. And do you know who Tiffini Stevenson Earl is? 11 A. I do. 12 Q. Who is she? 13 A. She works in the EOD office. 14 Q. Is she a lawyer? 15 A. She is. 16 Q. Would she have authority to train people on 17 what the human rights policy means? 18 A. I -- Yes. 19 Q. I'm going to ask you to flip to document nine 20 thirty -- or it's labeled at the bottom 935. Do you see 21 that? 22 A. Um-hm. 23 Q. Do you see that definition of creed? 24 A. Yes, I do. 25 Q. It says that -- "a strongly held philosophical</p>
<p style="text-align: right;">63</p> <p>1 campus? 2 A. There were. I don't know if there are now. 3 Q. And you would have had no problem with Muslim 4 groups selecting Muslims as their leaders; correct? 5 A. No. 6 Q. And you wouldn't have gotten into the question 7 of whether a student who was rejected was really a 8 Muslim or not a Muslim; right? 9 A. I don't think so. 10 Q. That would have been a decision just left to 11 the group; correct? 12 A. I would assume so, yes. 13 Q. And that would be true for Democrats rejecting 14 Republicans; correct? 15 A. Correct. 16 Q. And that would be true for a transgender 17 support group rejecting people who reject the idea of 18 transgenderism as a biological phenomenon; correct? 19 A. Correct. 20 Q. And you would want to be consistent across all 21 of those groups? 22 A. Correct. 23 Q. And creed is one of the protected categories 24 in the constitution -- or in the human rights policy; 25 correct?</p>	<p style="text-align: right;">65</p> <p>1 belief, even if not a recognized religion"; correct? 2 A. Correct. 3 Q. So that would include political beliefs; 4 correct? 5 A. Certainly. 6 Q. Beliefs about the environment? 7 A. I guess I've never thought of those as 8 philosophical beliefs, but sure. 9 Q. In fact, any student group that is formed 10 around some kind of an idea, whether it be the value of 11 music or why we like hunting, all of that could be a 12 creed; correct? 13 A. I don't -- I am not a lawyer nor would be 14 trained to -- 15 Q. But you agree she says here at least any 16 strongly held philosophical belief? 17 A. Yes. 18 Q. If you were going to stop student groups, 19 religious student groups, from selecting leaders based 20 on religion, you would also have to stop the 21 environmental group from using belief in its philosophy 22 as a criteria for selecting its leaders; correct? 23 A. You are delving into an area where I would 24 absolutely be talking to general counsel. 25 Q. But as the dean wouldn't that make sense to</p>

<p style="text-align: right;">66</p> <p>1 you?</p> <p>2 A. Probably if I got more training on that. I</p> <p>3 think that creed is included but not a whole lot of</p> <p>4 people understand it.</p> <p>5 Q. But just on a gut level would you find it</p> <p>6 problematic to tell religious groups that they can't use</p> <p>7 religion --</p> <p>8 A. Oh, yes.</p> <p>9 Q. -- to select their leaders?</p> <p>10 A. Yes.</p> <p>11 Q. And especially if you allowed environmental</p> <p>12 groups to use an environmental creed as a criteria for</p> <p>13 screening their leaders; correct?</p> <p>14 A. Sure.</p> <p>15 Q. I'm going back to the document labeled 118.</p> <p>16 This is, again, the letter from Dr. Nelson to</p> <p>17 Jacob Estell. Second paragraph says, "You have the</p> <p>18 opportunity to make additional revisions to your</p> <p>19 statement of faith in order to submit a version that</p> <p>20 complies with the University of Iowa human rights</p> <p>21 policy." Did it concern you to have a University</p> <p>22 official telling someone to revise their statement of</p> <p>23 faith?</p> <p>24 A. Yes.</p> <p>25 Q. And why?</p>	<p style="text-align: right;">68</p> <p>1 BLinC had asserted that everyone was admitted -- could</p> <p>2 be admitted as a member, everybody could be admitted as</p> <p>3 a leader even if they were gay as long as they signed a</p> <p>4 statement of faith, that would have changed your</p> <p>5 decision?</p> <p>6 A. Yes.</p> <p>7 Q. But you didn't know that?</p> <p>8 A. Correct.</p> <p>9 Q. In the middle of the second paragraph do you</p> <p>10 see where you say, "The statement of faith on its face</p> <p>11 does not comply with the University's human rights</p> <p>12 policy"?</p> <p>13 A. Yes.</p> <p>14 Q. And you wrote that even though you'd been</p> <p>15 concerned in reading Bill Nelson's letter that that</p> <p>16 would violate the First Amendment?</p> <p>17 A. Through conversation with general counsel.</p> <p>18 Q. So you were not the person who really dictated</p> <p>19 the content of this letter?</p> <p>20 A. No, that's incorrect. I wrote the letter and</p> <p>21 I reviewed it with general counsel.</p> <p>22 Q. If you had not spoken with general counsel</p> <p>23 would you have included that statement in this letter?</p> <p>24 A. I don't know.</p> <p>25 Q. If you would have you would agree that it</p>
<p style="text-align: right;">67</p> <p>1 A. Because it's a faith statement, and it's what</p> <p>2 somebody believes.</p> <p>3 Q. Did you have those concerns at the time?</p> <p>4 A. Well, if you'll notice, I wasn't copied on</p> <p>5 this. But later on I had a conversation with general</p> <p>6 counsel and Dr. -- yes, Dr. Nelson and Tom Baker.</p> <p>7 Q. And -- But you did say that you read it at the</p> <p>8 time you the decision; right? You had read it before</p> <p>9 you made your decision?</p> <p>10 A. Correct.</p> <p>11 Q. And when you made your decision that didn't</p> <p>12 come into play at all?</p> <p>13 A. And that's when I spoke with general counsel.</p> <p>14 Q. I'm going to ask you to look at document</p> <p>15 number 119. I'm going to -- This is the letter that you</p> <p>16 wrote affirming Dr. Nelson's decision; correct?</p> <p>17 A. Correct.</p> <p>18 Q. And in the first paragraph at the end you</p> <p>19 said, "My review is based upon the written record";</p> <p>20 correct?</p> <p>21 A. Correct.</p> <p>22 Q. We now know that by "written record" you meant</p> <p>23 just the findings that Ms. Cervantes wrote; correct?</p> <p>24 A. Correct, and Dr. Nelson's letter.</p> <p>25 Q. Okay. And so if during the investigation</p>	<p style="text-align: right;">69</p> <p>1 would be a violation of the First Amendment according to</p> <p>2 your understanding?</p> <p>3 A. According to my understanding.</p> <p>4 Q. And did you make any effort -- Did you seek</p> <p>5 individual counsel from any attorney on this issue?</p> <p>6 A. No.</p> <p>7 Q. Then in the second or the third paragraph you</p> <p>8 say, "Your appeal document states that the University is</p> <p>9 forcing BLinC to revise its statement of faith or be</p> <p>10 kicked off of campus." So you knew at the time that</p> <p>11 BLinC believed that it was being forced to revise its</p> <p>12 religious beliefs?</p> <p>13 A. If they wanted to be a registered student</p> <p>14 organization.</p> <p>15 Q. Then two more sentences down you say, "Student</p> <p>16 organizations are separate legal entities from the</p> <p>17 University of Iowa and legally are not treated the same</p> <p>18 as University departments or units." Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. What was your purpose in including that</p> <p>21 statement?</p> <p>22 A. Faculty, staff, employees, have different</p> <p>23 rights than students on a college campus, are governed</p> <p>24 through contracts -- I'll just say contracts versus the</p> <p>25 student code of conduct. So that's what I meant by</p>

<p style="text-align: right;">70</p> <p>1 that. The other thing is that the University of Iowa 2 does not require student organizations to have advisors 3 for their student -- to be a student organization. 4 Q. Is that to create separation between the 5 University and student organizations? 6 A. I assume so. I know I had asked that question 7 and never really understood why. I don't know. 8 Q. Are you aware that the University has 9 different tiers of student organizations? 10 A. Yes. I never fully -- Even though I was there 11 for three years, I never fully understood the structure, 12 the organization. They talked about umbrella groups 13 and . . . 14 Q. I'm going to ask you to flip quickly back to 15 document 14. This is on the fourth page of that 16 document. And it says -- You see there's three tiers, 17 general student organizations, affiliated student 18 organizations, and then on the next page sponsored 19 student organizations. These are the different tiers 20 that the University has; correct? 21 A. Yes. 22 Q. Did you have a general knowledge of the 23 difference in the tiers? 24 A. Yes. 25 Q. What's the basic idea here?</p>	<p style="text-align: right;">72</p> <p>1 A. Yes. 2 Q. And then the next paragraph -- I'm sorry, the 3 first full paragraph after subheading 1 it says, very 4 close to the end on the left-hand column, "Registration 5 of a student organization by the University does not 6 constitute an endorsement of its programs or purposes 7 but is merely a charter to exist." 8 A. Yes. 9 Q. This seems like an effort to separate the 10 University from the student organizations; correct? 11 A. Yes. 12 Q. Would you say that if student organizations 13 say something offensive that the University would use 14 this to disassociate itself from the student 15 organization? 16 A. I have no idea. I don't know. 17 Q. But it could be used to do that; right? 18 A. I suppose so. 19 Q. I'm going to have you turn back to 20 Exhibit 119. I'm now looking at the last paragraph on 21 the first page. It says, "In addition, upon appeal you 22 now claim for the first time that the complainant was 23 not allowed to hold a leadership position because he 24 confirmed that he intended to be sexually active in 25 same-sex relationships." Why did you say that this is</p>
<p style="text-align: right;">71</p> <p>1 A. I'll have to review it. It's been a while. 2 Q. Okay. 3 A. Briefly I think my understanding is that the 4 three different tiers have to do with how specific they 5 relate to the University. 6 Q. Is it fair to say that the sponsored student 7 organizations are closely affiliated with the 8 University? 9 A. Correct. 10 Q. Correct? 11 A. Yes. 12 Q. And the affiliated students are less? 13 A. Correct. 14 Q. And that general student organizations have 15 almost no connection; correct? 16 A. Correct. 17 Q. It says, "The University does not support or 18 endorse the purposes of these general organizations"; 19 correct? 20 A. Correct. 21 Q. Do you know why that's included? 22 A. I don't. 23 Q. Do you see on the very first page of this 24 document where it says on the second sentence, "Student 25 organizations are separate legal entities"?</p>	<p style="text-align: right;">73</p> <p>1 now -- you claim for the first time? 2 A. Upon reviewing everything I'm sure it was a 3 mistake. 4 Q. In fact, you didn't know that? You didn't 5 know it was the first time they'd alleged that; right? 6 A. Probably not, no. 7 Q. It's possible they had told Connie? 8 A. Yes. 9 Q. It's possible? 10 A. Possibly, yes. 11 Q. In emails with Marcus it's possible? 12 A. Correct. 13 Q. It was stated in the email that 14 Hannah Thompson first sent you; correct? 15 A. Yes. 16 Q. And that's one that you had reviewed? 17 A. Um-hm. 18 Q. So this is just a false statement; correct? 19 A. Yep. 20 Q. Is that a yes? 21 A. Yes. 22 Q. In the next sentence where you said, "This 23 assertion by BLinC of the complainant's intentions 24 specifically regarding sexual activity outside of 25 marriage was not previously addressed by BLinC and the</p>

<p style="text-align: right;">74</p> <p>1 making of such a statement by the complainant was not 2 validated through the investigation process and 3 finding," in fact, you have no idea if that's true or 4 not; correct? 5 A. I believe that's true through the 6 investigation and the findings. 7 Q. But the first part that says, "This assertion 8 by BLinC of the complainant's intentions specifically 9 regarding sexual activity outside of marriage was not 10 previously addressed by BLinC" -- 11 A. Correct. 12 Q. -- you have no idea if that's true? 13 A. Correct. 14 Q. In fact, you know that's false based on the 15 documents you have seen today? 16 A. Based on this information. 17 Q. So this process was totally unsupported by the 18 evidence and didn't follow -- well, is it correct then 19 that this process was not supported by the evidence or 20 the decision -- Let me restate that. 21 It's correct then, isn't it, that the decision 22 to deregister BLinC was not supported by the factual 23 evidence? 24 A. The reason I'm hesitating is looking at all of 25 the -- Never mind. Correct.</p>	<p style="text-align: right;">76</p> <p>1 Q. You didn't oversee it? 2 A. No. 3 Q. Why not? 4 A. I don't know. I wasn't asked to be a part of 5 it. At that point I had already announced my upcoming 6 retirement, and so I think folks were moving on without 7 me. 8 Q. I'm going to ask you to look at one more 9 document. This is a document labeled 81. It should be 10 in the binder in front of you. Do you recognize this 11 document? 12 A. Yes. Yes. I remember. Not in detail. 13 Q. But you reviewed this document? 14 A. It came -- I believe it came to me. 15 Q. And you are cc'd on the document; right? 16 A. Yeah. Yes. 17 Q. And you would have reviewed it in the normal 18 course? 19 A. Reviewed it after receiving it, not review it 20 for editorial comments or anything, yes. 21 Q. Do you remember that there was a finding of no 22 reasonable basis? 23 A. Yes. 24 Q. Do you remember any of the facts? 25 A. I don't.</p>
<p style="text-align: right;">75</p> <p>1 Q. So if what everything I've told you today is 2 true, BLinC never should have been deregistered? 3 A. Correct. 4 Q. So it's fair to say that this entire process 5 was just screwed up; is that correct? 6 A. That sounds like a student affairs term, not a 7 legal term. 8 Q. I'm going to ask you to look at document 9 number 120. 10 A. There's no document. 11 Q. I'll just ask you, did you ever communicate 12 with Bruce Harreld about the BLinC situation? 13 A. I don't remember. I don't remember. I had 14 very little interaction with him. 15 Q. Were you -- After you wrote the letter 16 upholding the deregistration of BLinC, what further 17 involvement did you have? 18 A. Very little. I believe it was after that that 19 the University started reviewing the student 20 organizations and their constitutions. That's where 21 there were meetings that were happening and that 22 conference call. 23 Q. And did you participate at all in the review 24 of the constitution? 25 A. I did not.</p>	<p style="text-align: right;">77</p> <p>1 Q. Do you remember if this -- This was dated 2 July 24, 2017; correct? 3 A. Yes. 4 Q. And this was around the same time that the 5 BLinC finding came out; correct? 6 A. Yes. 7 Q. Did anything, in reading this, raise any red 8 flags in your mind about why one student organization 9 was being -- not being penalized and why one was? 10 A. Yeah. Well, red flags, I don't know about red 11 flags, but certainly raised questions. 12 Q. Did you follow up with anyone about that? 13 A. I spoke with general counsel. 14 Q. Did you speak to anyone else about it? 15 A. I don't think so. 16 Q. My last question is do you recall any further 17 involvement you had either concerning BLinC, 24:7, or 18 the review of all the student constitutions on campus? 19 MR. CARROLL: When you say further 20 involvement, you're not talking about the litigation? 21 MR. BAXTER: Other than the litigation. 22 MR. CARROLL: Yeah, because she's a named 23 defendant. She's got a little involvement. 24 A. Yeah, other than that -- No, I really don't. 25 Honestly I was generally gone from the University by</p>

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1 **sometime in March.**

2 MR. BAXTER: I have no further questions.
3 (Exhibits 98, 106, 108-111, 114-116, 118-120
4 were marked for identification by the reporter.)
5 (Deposition concluded at 11:27 a.m.)
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1 **CERTIFICATE**

2 I, Karrie Truitt, Certified Shorthand Reporter
3 of the State of Iowa, do hereby certify that on the
4 9th day of August, 2018, at UI Research Park,
5 2500 Crosspark Road, Coralville, Iowa, there appeared
6 before me the following-named person, to wit: LYN
7 REDINGTON, who was by me first duly sworn to testify the
8 truth, the whole truth, and nothing but the truth in the
9 above-entitled cause; that I reported in shorthand the
10 testimony of said witness, reduced the same to
11 typewriting under my direction and supervision, and that
12 the foregoing deposition is a true record of the
13 testimony given by said witness and of all proceedings
14 had on the taking of said deposition at the above time
15 and place.

16 I further certify that I am not related to or
17 employed by any of the parties to this deposition, and
18 further that I am not a relative or employee of any
19 attorney or counsel employed by the parties hereto or
20 financially interested in the action.

21 IN WITNESS WHEREOF, I have set my hand this
22 22nd day of August, 2018.
23
24
25

26 Karrie Truitt
27 Certified Shorthand Reporter

Karrie Truitt, CSR, RPR
CARSON REPORTING, INC. - 319/366-7450

IVCF App. 669

App 0588

Cervantes, Constance A

From: Miller, Marcus
Sent: Monday, February 20, 2017 11:39 AM
To: Cervantes, Constance A
Subject: Fw: Business Leaders in Christ

Marcus Miller
University of Iowa, Class of 2018
Resident Assistant, Daum Hall
Founder and President of Love Works

From: Thompson, Hannah E
Sent: Wednesday, June 22, 2016 9:48 AM
To: Miller, Marcus J
Subject: Re: Business Leaders in Christ

Dear Marcus,

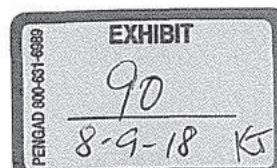
I hope that you are enjoying your summer vacation and that you are well. You may notice that it has taken awhile for me to respond to you, and while I sincerely do apologize for the delay, I wanted to ensure that my response was not purely a reflection of my emotions, but rather a reflection of what God continues to speak to me. Once again, I have needed quite a while to pray and think about an appropriate and God-honoring response.

I believe that you should know that when I first read your email, I was quite hurt and taken aback. While I am so glad to hear that you have been blessed by BLinC (praise be to God!), I was caught off guard by your words as I did not sense that our conversation in April ended in such a negative manner.

I want to, most importantly, clarify what I desired to convey to you and I apologize if what follows was not clearly communicated when we initially met. First and foremost, the reason why I made the decision that I could not allow you to be in a leadership position within BLinC is because of your desire to *pursue* a homosexual lifestyle/relationship. I emphasize the word pursue because what this communicates to me is your intention of choosing to continue to sin rather than turning from your sin and pursuing the sanctified life that Jesus promises us once we have come to salvation in Him. To clarify this further, a sanctified life does *not* mean that we are perfect, nor does it mean that we will ever be perfect while on earth, but it does mean that while we continue to struggle, we are turning and repenting from our sin because walking with Christ is far better than anything this world may offer us and the only way to obtain life, as told within scripture.

Struggling with homosexuality, yet not acting upon it, is a different story. As I mentioned, we all struggle with a multitude of sin, however, the difference is a decision to deny our fleshly desires, and pursue righteousness. When we stumble, we are lavished with the grace and mercy of God, which I would be a hypocrite to withhold from anyone as I have been so freely given this grace just the same as any child of God. These are not my intentions (to withhold grace and mercy) and I do not want this to be confused with the importance of turning from sin which we are called to do once we become followers of Jesus (Romans 6:1-2).

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BLinC-Def 002597

IVCF App. 670

App 0589

As you may correctly imply, my position on homosexuality, regardless of whether it is within a loving marriage or not, is that it remains to be a sin. As the Bible does not provide any evidence that it is 1) pleasing to God, 2) produces fruit in the life of a Christian (Colossians 1:10), 3) good for the life of a Christian (1 Corinthians 10:23).

Ultimately, brother, I want you to know that it is *not* because you call yourself a homosexual that you cannot be on leadership, but your *pursuit* of this sin is how I came to such conclusions. That being said, you have my word that I will hold myself, and the other executives to this exact standard, regardless of the specific sin. Those in an executive position within BLinC are being held to the standard that, although we may struggle, we choose to turn from our sin and receive the grace of Jesus. My hope and prayer is that this brings clarity to our initial conversation.

Additionally, I would like to address your point about an assumed acceptance of woman being pastors in the church. This is not true, and I do not believe that woman being pastors is biblical for several reasons. I do not believe that being a in a position of leadership within BLinC reflects the intentions of this passage within scripture. BLinC is not a church and I am not a pastor, nor do I claim to be a pastor. However, I did not even think of this prior to your suggestion, thus, thank you for making me aware of the potential confusion and I will be more mindful of how I am being received by others.

Lastly, I could go on and on, however, I want to emphasize that my intentions were never to make you feel unloved, nor to make you feel unwelcome with myself or at BLinC. You should know that I am not at all interested in being correct, but I am solely concerned with you and your salvation. After praying about this for months now, you should know that I have continued to be affirmed in the truth of the word of God and not supplementary materials.

It grieves me to know that Satan is attacking you and causing you to feel things such as loneliness and confusion, as this is not what Jesus desires for you. As a sister in Christ, I want to do all that I can to help you, love you, and support you (although we may currently disagree) in your walk with Christ and, specifically, right now during this period of your life as the Lord has brought us together. I have been praying for you a lot and will continue to do so. If you need anything, please let me know, however, I do not wish to continue this conversation via email, purely because things can so easily get misconstrued. Please do not hesitate to call or Facetime, or I would even be happy to meet with you if you would like, please let me know. May Christ rule in our hearts the rest of the summer and be glorified through our speech and actions. To Him be all the glory.

Soli Deo Gloria,

Hannah

From: Miller, Marcus J
Sent: Tuesday, May 17, 2016 5:31:48 PM
To: Thompson, Hannah E
Subject: Business Leaders in Christ

Dear Hannah and Business Leaders in Christ,

I would like to first start off by encouraging you all. The work you are doing in advancing God's Kingdom is super cool. Through volunteering with Faith Academy to being a light for the Tippie College of Business, I know God is using you all in amazing ways that often times aren't recognized right away. So keep up what you are doing.

I am writing this to express some concerns with regards to the decision to not allow me to be on the executive board. It was made clear to me that the reason I am not allowed to be on the executive board is due to my sexual orientation, combined with potentially having a revisionist view on the subject of marriage. However, if I were straight, I was told this would not be an issue. The purpose of this email is not to change your opinions on what the correct theology/interpretation of God's Word is. Rather, I want to raise some concerns as to whether this was handled Biblically.

I am seeking to follow Jesus with all of my heart. I was told that if I end up having the revisionist interpretation and acting on that, I wouldn't be doing so, hence the reason I was not allowed to be on the executive board. However, God promises the Holy Spirit to those who confess that Jesus Christ is their Lord. I have been studying God's Word intensely, coupled with historical analysis, Greek and Hebrew root analysis, and a whole lot of prayer, asking that God reveals to me what His will is for my life. It seems wrong, and unbiblical to have another believer tell me that even though I am relying on the Holy Spirit to guide me, I am failing to follow Jesus fully. It is tantamount to saying to me, "The Holy Spirit actually isn't working in your life, so we are going to override what God is revealing to you." To me, when I was told that I am not following Jesus, it felt like it was both a mischaracterization, and a personal attack on my journey of finding God's will for my life. I felt invalidated, and Jesus spoke against this during His sermon on the Mount when he stated "Judge not, that you be not judged. For with the judgement you pronounce you will be judged, and with the measure you use it will be measured to you. Why do you see the speck that is in your brother's eye, but do not notice the log that is in your own eye? Or how can you say to your brother, 'Let me take the speck out of your eye,' when there is the log in your own eye? You hypocrite, first take the log out of your own eye, and then you will see clearly to take the speck out of your brother's." (Matthew 7:1-5).

Perhaps this will become less abstract and more concrete with an example. Some very conservative churches argue that women should not have leadership positions in the church, and that doing so is going against God's design. The Bible speaks to this issue, in 1 Corinthians 14:34 "Women should remain silent in the churches. They are not allowed to speak, but must be in submission, as the law says." However, BLinC has obviously interpreted that through the lens of a historical perspective, and realize that this was something that was meant for that culture back then (ie, women were not educated back then, and therefore would often times not be qualified or be a distraction). To be clear, I agree with BLinC, and definitely think women should be allowed leadership roles in the church. However, if someone were to tell you (Hannah) that you are not following Jesus fully because you are acting on your temptation to be a leader, then that would of course be false and rude. We know that you are following Jesus daily, and we know that God is using you in mighty ways. For someone to tell you this would be judgmental and unbiblical. This is exactly how I feel; the topic is just different.

I pray that God would soften all of our hearts as we seek truth, and what God's will actually is. I recognize the difficulty in this situation, and am in no way trying to discourage BLinC. I am simply raising some potential concerns as we all seek to become more like Jesus every day. The reality is that we are all in need of abundant grace—and we all fall short. As brothers and sisters in Christ, I pray we can work through this and that God would be glorified through it all. The timing of this is good, and perhaps the summer will be a nice break as we all take some time to reflect on what God's will is for each of our own lives.

Have a great summer, BLinC!

Marcus Miller

Sent from [Mail](#) for Windows 10

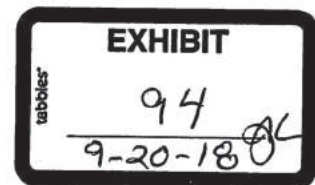
Cervantes, Constance A

From: Baker, Thomas R
Sent: Wednesday, February 22, 2017 9:29 AM
To: Cervantes, Constance A; Finger, Kristi L
Cc: Redington, Lyn; Cory, Anita
Subject: 2009 Memo from VPSL re statements of faith
Attachments: 135copier20170222091614.pdf

Kristi & Connie

After Kristi alerted me last week that a complaint had been filed, I checked my old files. Attached is the most recent memo I could find from the Vice President on this topic. You'll note that this memo was sent out before the US Supreme Court issued its decision in the Hastings Law College case, which had an "all comers" policy. As far as I know, the University of Iowa Human Rights Policy does not mandate an "all comers" policy, so the policy articulated in the 2009 memo regarding statements of faith is still current, as far as I know.

Tom Baker
Associate Dean of Students
319-335-1162



EXHIBIT

tabbies

109
9-20-18 JC

July 14, 2017

VIA EMAIL

Dean Lyn Redington
 Assistant Vice President and Dean of Students
 University of Iowa
 Office of the Dean of Students
 135 Iowa Memorial Union
 Iowa City, IA 52242
 lyn-redington@uiowa.edu

Dear Dean Redington,

I am a University of Iowa student and the incoming president of the student group BLinC or Business Leaders in Christ. As you know, on June 30, Ms. Schriver Cervantes from the Office of Equal Opportunity and Diversity found that BLinC had violated the University's *Policy on Human Rights*. It is my understanding that the matter has now been sent to you for a decision whether BLinC should be sanctioned. It should not. In fact, sanctioning BLinC would violate both the University's own policies and state and federal law.

First, Ms. Schriver Cervantes' conclusion that BLinC violated the *Policy on Human Rights* is incorrect. The University's own policies respect the right of student groups to "exercise free choice of members" who "subscribe to the goals and beliefs of the organization." BLinC did not discriminate against the complaining student because of his sexual orientation. The student participated in BLinC before asking for a leadership position, and remains welcome to participate—even as a leader, regardless of his sexual orientation. The student was not eligible to be a leader of BLinC only because he stated that he disagrees with, and would not try to live by, BLinC's Christian principles, which means he could not effectively lead our group.

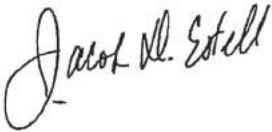
Second, your office has previously agreed that it would be a violation of the Iowa Human Rights Act to force a student group to accept leaders whose behavior is contrary to the group's purpose or its statement of faith. Such coercion would also violate federal law, including the First Amendment. BLinC is a Christian organization for students who share core Christian convictions. Its entire purpose is to encourage students to live according to its understanding of Christian principles. And its leaders play a religious role in leading the group. BLinC cannot fulfill its core mission if its leaders do not support its beliefs. The First Amendment protects BLinC's right to select leaders who share its mission.

The University itself also protects that right for a wide variety of other student groups who require both their leaders and their members to support their organizations' goals and purposes. BLinC's earlier letter to Ms. Schriver Cervantes, on which you were copied, identifies many of those organizations. Because your office has acknowledged that forcing a religious group to select leaders who oppose its mission would violate the Iowa Human Rights Act, and because you have taken no action against many other student groups with leadership standards, targeting BLinC because of its religious beliefs would be an intentional violation of both state and federal law, raising the potential for punitive damages against the University and its officers.

BLinC-Def 002686

For all these reasons, it is our hope that you will reverse Ms. Schriver Cervantes' findings and take no further action against BLinC.

Sincerely,



Jacob D. Estell
President
Business Leaders in Christ

cc: Georgina Dodge (*georgina-dodge@uiowa.edu*)
Jennifer A. Modestou (*jennifer-modestou@uiowa.edu*)
William Nelson (*william-nelson@uiowa.edu*)
Anita Cory (*anita-cory@uiowa.edu*)
Susan M. Sager (*susan-sager@uiowa.edu*)
Constance A. Schriver Cervantes (*constance-cervantes@uiowa.edu*)

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
EASTERN DIVISION

BUSINESS LEADERS IN
CHRIST, an
unincorporated
association,

Plaintiff,

vs.

THE UNIVERSITY OF
IOWA; LYN REDINGTON,
in her official
capacity as Dean of
Students and in her
individual capacity;
THOMAS R. BAKER, in
his official capacity
as Assistant Dean of
Students and in his
individual capacity;
and WILLIAM R. NELSON,
in his official
capacity as Executive
Director, Iowa
Memorial Union, and in
his individual
capacity,

Defendants.

CASE NO. 3:17-CV-00080

Deposition of

HANNAH E. THOMPSON

Deposition of HANNAH E. THOMPSON, taken
before Julie M. Kluber, Certified Shorthand
Reporter, commencing at 8:29 a.m., August 17,
2018, at 2500 Crosspark Road, Room W219,
Coralville, Iowa.

Julie M. Kluber, CSR, RMR
3515 Lochwood Drive NE
Cedar Rapids, IA 52402
319.286.1717
1.866.412.4866

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and
NATHAN E. LEVIN
Attorney at Law
University of Iowa
Office of the General Counsel
120 Jessup Hall
Iowa City, IA 52242-1316

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1 (Deposition Exhibits A through Y were
 2 marked for identification by the reporter.)
 3 HANNAH E. THOMPSON,
 4 called as a witness, having been first duly
 5 sworn, testified as follows:
 6 DIRECT EXAMINATION
 7 BY MR. CARROLL:
 8 Q. Will you state your full name for the record.
 9 A. Yes, Hannah Elizabeth Thompson.
 10 Q. Okay. And, Hannah, you may need to speak up a
 11 little bit.
 12 A. Okay.
 13 Q. Okay, thank you.
 14 A. Not many people tell me that.
 15 Q. Well, she needs to hear it. Hannah, I'm going
 16 to show you what's been marked as Exhibit A in
 17 this case.
 18 A. All right.
 19 Q. Are you familiar with that document?
 20 A. I am.
 21 Q. And if you look at the list of topics, are you
 22 familiar with that list?
 23 A. I am.
 24 Q. Do you understand you're here to discuss, in
 25 part, that list of topics?

1 MR. BAXTER: Just to clarify, Hannah's not
 2 designated for topic Number 7.
 3 MR. CARROLL: Right. That's an issue we
 4 have, right.
 5 MR. BAXTER: Yes.
 6 MR. CARROLL: Is that the declaration of
 7 you?
 8 MR. BAXTER: Correct.
 9 MR. CARROLL: Yeah, that's okay.
 10 MR. BAXTER: Okay. Just letting you know.
 11 MR. CARROLL: I understand. We'll have
 12 that argument later.
 13 A. I do.
 14 Q. But you understand that one of the purposes
 15 today is to discuss those topics?
 16 A. Yes.
 17 Q. Okay. Have you ever had your deposition taken
 18 before?
 19 A. I have not.
 20 Q. Okay. And I'm sure your attorney's gone over
 21 the ground rules, but I want to talk about them
 22 with you. One, let me finish my question
 23 before you respond so that we're not talking at
 24 the same time. Two, if I ask a yes-or-no style
 25 of question, you need a verbal response rather

1 than an um-hmm or a nod because it doesn't show
 2 up well.
 3 A. Yes.
 4 Q. Three, if you do not understand my question,
 5 just ask me to clarify it.
 6 A. Okay.
 7 Q. I want to make sure we're talking about the
 8 same things today. And, four, if you need a
 9 break, you can ask for a break but you can't
 10 ask for one during a pending question. You
 11 need to answer the question, and you're more
 12 than welcome to have a break if you want one.
 13 A. All right.
 14 Q. When were you a member of BLinC?
 15 A. I helped start the organization in the spring
 16 of 2014, and I continued membership and I was
 17 on the executive board in the spring of 2017.
 18 Q. Did you graduate from Iowa in 2017?
 19 A. I did.
 20 Q. Is that why you're no longer affiliated with
 21 BLinC?
 22 A. That's correct.
 23 Q. Can you please explain to me how an openly gay
 24 student could be a leader in BLinC?
 25 A. Could be?

1 Q. Yes.
 2 A. Okay. Well, so according to the situation,
 3 there was -- there were some differences in
 4 terms of how we interpreted scripture,
 5 interpreted the Bible. That was a large part
 6 of what we did was we came together and
 7 understood the Bible and how to apply that to
 8 our lives, and in the situation, we came from
 9 two different perspectives, which as the
 10 president I did not see as a good fit in terms
 11 of protecting the organization, so at the time
 12 it wasn't possible for Marcus to join our
 13 leadership team.
 14 Q. And when you said this situation, my question
 15 was more general.
 16 A. Okay.
 17 Q. How can an openly gay student at the University
 18 of Iowa be a leader in your group if they say,
 19 "I am openly gay and I continue" -- "I will
 20 continue to that lifestyle." Could they be a
 21 leader in BLinC?
 22 A. No, they could not be.
 23 Q. Okay. And are you familiar with the University
 24 of Iowa human rights policy?
 25 A. I am.

1 Q. You understand that it violates the policy to
 2 discriminate based on sexual orientation.
 3 A. I understand that's a violation of the policy.
 4 Q. Okay. Do you believe BLinC violated the policy
 5 in the treatment of Marcus Miller?
 6 A. I do not believe that we violated the policy.
 7 Q. And why is that?
 8 A. I believe that we did not violate the policy
 9 because it was not on the basis of his sexual
 10 orientation that we denied leadership. As I
 11 mentioned previously, I believe that we came
 12 from two different places in terms of our view
 13 of the Bible, which was a large part of the
 14 reason why we were even gathering as a student
 15 organization; and to protect and uphold that as
 16 the inherent word of God, I believe that we
 17 came from two separate positions. Thus, I
 18 don't believe we discriminated on that basis.
 19 Q. And so you made a decision based on his
 20 religious beliefs?
 21 A. I did.
 22 Q. His religious beliefs were in part founded on
 23 his being openly gay. Like he disagreed with
 24 BLinC's statement, mission statement. Is that
 25 fair?

1 A. That's fair.
 2 Q. Okay. So how do you distinguish between being
 3 openly gay and wanting to be a member of your
 4 group without putting in place the fact he's
 5 openly gay?
 6 A. Could you restate that one more time, please.
 7 Q. Yes. If the individual is openly gay and it's
 8 counter to your statement of faith or mission
 9 statement -- and you know what I mean by that?
 10 A. Um-hmm.
 11 Q. Yes?
 12 A. Yes. Sorry.
 13 Q. Sorry. It's human nature.
 14 A. Yes.
 15 Q. Okay. So we have an openly gay student --
 16 A. Yes.
 17 Q. -- that -- and I'm going to have an openly gay
 18 lifestyle that's contrary to BLinC's mission
 19 statement. Is that correct?
 20 A. Yes, that's correct.
 21 Q. Okay. So I can never be a leader because I'm
 22 openly gay?
 23 A. I would say based on the way that we interpret
 24 the Bible believing that -- that it is true and
 25 the way that we both understood that issue, I

1 would say it wasn't an appropriate fit --
 2 Q. Okay.
 3 A. -- at the moment. Similarly, should someone
 4 come to me, seek an executive position;
 5 however, they are sleeping with a boyfriend or
 6 a girlfriend, I would also say that it's not a
 7 right fit in terms of our moral understanding
 8 of what God's word says.
 9 Q. And having intercourse as an unmarried
 10 individual doesn't fit with your mission
 11 statement. Correct?
 12 A. I would agree, yes.
 13 Q. But their status as a heterosexual couple, the
 14 problem, the fit problem is you don't believe
 15 in our mission statement because you're having
 16 intercourse. Correct?
 17 A. Um-hmm. Yes.
 18 Q. With respect to the openly gay person, isn't
 19 there a status component that it's openly gay?
 20 It's not just having intercourse, it's you are
 21 openly gay.
 22 A. I would say if someone says they're openly gay
 23 or if they are having premarital intercourse,
 24 that is along the same -- that's a similar
 25 argument, and I would say that's similarly

1 grounds for -- for disagreement and not a great
 2 fit for the position.
 3 Q. And the heterosexual intercourse is against
 4 your mission statement, so that's conduct.
 5 Right? If I said to you flat-out, "I'm
 6 sleeping with my girlfriend" --
 7 A. Yes.
 8 Q. -- I don't fit your mission statement, do I?
 9 A. No, but you'd be more than welcome as a member,
 10 just not in a leadership position.
 11 Q. Okay. And so that's conduct. I'm telling you
 12 this is my conduct.
 13 A. Yes.
 14 Q. Right?
 15 A. Yes.
 16 Q. Okay. Is there a distinction in your mind
 17 between conduct and status?
 18 A. Yes.
 19 Q. Okay. And status is, under the University of
 20 Iowa human rights policy, protected
 21 classifications. Correct?
 22 A. Correct.
 23 Q. You understand that under the human rights
 24 policy, the University of Iowa, for example,
 25 can't discriminate against you because of your

1 gender.
 2 A. Correct.
 3 Q. Okay. That is your status.
 4 A. Yes.
 5 Q. You are a woman.
 6 A. Yes.
 7 Q. Correct?
 8 A. Yes.
 9 Q. If I tell you that you're not going to get this
 10 job, let's just say a part-time job at the
 11 University of Iowa while you were here, you are
 12 not going to get this job because I don't want
 13 a woman interacting with the public in this
 14 job, do you think that would violate the human
 15 rights policy?
 16 A. Yes.
 17 Q. Okay. So if I tell an individual, "You cannot
 18 be part of our group because you are openly
 19 gay," does that violate the human rights
 20 policy?
 21 A. That's not what happened, but yes.
 22 Q. No, I'm asking you generally.
 23 A. Yes.
 24 Q. If I tell a student, "You are not going to get
 25 this job because you are openly gay," would

1 that violate the human rights policy?
 2 A. Yes.
 3 Q. Okay. So when BLinC decided not to select
 4 Marcus Miller as a leader, he was gay but it's
 5 because he didn't agree with your -- BLinC's
 6 beliefs?
 7 A. Yes.
 8 Q. Okay.
 9 A. I would say that's the main reason why we
 10 didn't select him for the leadership position.
 11 Q. When you said main reason, what were the other
 12 reasons?
 13 A. As I mentioned previously, the purpose of BLinC
 14 was to meet, to gather, to create Christian
 15 community in the business school; to put -- to
 16 show students that there's a very functional
 17 and tangible way where faith intersects work
 18 and how to honor God and to represent our faith
 19 in a way that is consistent with our beliefs.
 20 And when Marcus approached me for the
 21 leadership position, as we discussed -- as we
 22 met and as we discussed how he interpreted
 23 scripture, it became clear to me that he's
 24 great. He's a great person, but it's probably
 25 best for the organization that we don't work

1 with -- work together on the executive team.
 2 He's more than welcome to be a member, but
 3 it -- for me there was a conflict in terms of
 4 the way that we interpreted the Bible, and in
 5 terms of someone living in a way that was
 6 contrary to our beliefs seemed confusing for
 7 me, and if it was confusing for me, I believe
 8 that would be confusing for members. As the
 9 president of the organization, I wanted to
 10 protect the purpose and the mission of the
 11 organization and alleviate confusion for our
 12 members and for our team.
 13 Q. And how many members did you have at the time
 14 of Marcus Miller's application for leadership?
 15 A. Seven.
 16 Q. It was less than ten, wasn't it?
 17 A. Yes.
 18 Q. And you understand -- Well, you were one of
 19 the founders or the founder?
 20 A. I was one of the founders.
 21 Q. And when that group was created, you were
 22 subject to all University of Iowa policies and
 23 procedures?
 24 A. Yes.
 25 Q. So you were subject to the human rights policy;

1 you were subject to, if you were registered,
 2 financial auditing and accounting; you were
 3 subject to academic standards. For example, if
 4 you were caught -- not personally. If an
 5 individual was caught with academic cheating,
 6 they may be expelled from a registered group.
 7 Correct?
 8 A. Sure, yes.
 9 Q. And you had an advisor, did you not?
 10 A. Yes.
 11 Q. And the advisor was within the College of
 12 Business?
 13 A. Yes.
 14 Q. And with respect to Marcus Miller, did you know
 15 him before he applied to be vice president?
 16 A. Yes.
 17 Q. And he hasn't graduated yet from Iowa. Are you
 18 aware of that?
 19 A. Yes.
 20 Q. He's an excellent student, is he not?
 21 A. Yes.
 22 Q. I mean as far as you know.
 23 A. Um-hmm. Yes.
 24 Q. He's engaged in the community, the university
 25 community.

1 A. Yes.
 2 Q. So but for being gay, he would have been an
 3 excellent candidate. Is that fair?
 4 A. Again, I think the Bible was a hugely important
 5 foundation for the reason of why we were -- we
 6 functioned as an organization, and we had
 7 different interpretations of the Bible. We --
 8 And so it did not seem like a great fit for us
 9 to work together.
 10 He is an excellent person and friend, and
 11 I -- it was great to get to know him and
 12 befriend him, but similarly, as -- in the world
 13 of, you know, churches, churches have different
 14 beliefs for different reasons, and people
 15 congregate together for different reasons.
 16 That, I would say, is a similar comparison. We
 17 have different beliefs and views of scripture,
 18 and that was foundational for Business Leaders
 19 in Christ.
 20 Q. And did your group take state money?
 21 A. From the university?
 22 Q. Yes.
 23 A. Yes.
 24 Q. You understand it's the State University of
 25 Iowa. That's its official name.

1 A. Yes. Yes.
 2 Q. So you, in fact, took student fees and other
 3 benefits from the University of Iowa to keep
 4 your group viable. Is that fair?
 5 A. That's fair.
 6 Q. Okay. Do you know how many private churches
 7 take state money?
 8 A. I do not know.
 9 Q. Okay. So would you agree with me that a
 10 comparison to a private church and what their
 11 beliefs are and what their membership criteria
 12 can be and who their priest or pastor can be,
 13 that they have the absolute right as a religion
 14 to make those decisions.
 15 A. Sure.
 16 Q. Okay. Do you believe it's the same when you
 17 take state of Iowa money?
 18 A. As a religious organization, we have the
 19 freedom to meet and to assemble together.
 20 Q. Okay.
 21 A. So I believe we have the right to choose which
 22 leaders are in our organization, and as a
 23 religious student group at the University of
 24 Iowa, we were offered funding and the
 25 university approved us as an organization and

1 we did nothing to dishonor, I would say, our
 2 status with the university. We were trying to
 3 act -- We wanted to benefit our community. We
 4 wanted to benefit the business school, and I
 5 would say we, as a religious organization,
 6 wanted to -- we wanted to freely assemble.
 7 Q. Okay. As a state-funded religious
 8 organization, correct?
 9 A. Sure.
 10 Q. You used the Memorial Union free of charge.
 11 Correct?
 12 A. Yes.
 13 Q. You used the recruitment fair and a table free
 14 of charge.
 15 A. Yes.
 16 Q. You used a mass email system free of charge?
 17 A. We did not use the system, but could have, yes.
 18 Q. Okay. You had access to it.
 19 A. Um-hmm.
 20 Q. You understand the University of Iowa was --
 21 A. Yes.
 22 Q. -- was paying for that computer system?
 23 A. Yes.
 24 Q. You used other benefits that were state-funded,
 25 correct?

1 A. Yes.
 2 Q. Did you meet in Tippie College of Business?
 3 A. We did.
 4 Q. So you used a public building for your group,
 5 correct?
 6 A. Yes.
 7 Q. In this case, at some point you became aware of
 8 the Marcus Miller complaint; correct?
 9 A. Yes.
 10 Q. Were you interviewed by somebody from the
 11 University of Iowa?
 12 A. I was.
 13 Q. Do you remember who interviewed you?
 14 A. Yes.
 15 Q. Who was that?
 16 A. Connie Cervantes Schriver and Tom Baker.
 17 Q. And actually, her name's the other way.
 18 A. Oh.
 19 Q. But you're close.
 20 A. Okay.
 21 Q. All right. And you met where with her?
 22 A. I met with her in a hall in the Pentacrest.
 23 Q. Jessup Hall?
 24 A. Yes, Jessup Hall.
 25 Q. I mean it wasn't in the College of Business.

1 A. Correct.
 2 Q. And once the complaint came to light, did you
 3 tell your advisor for the College of Business,
 4 "Hey, this is out there"?
 5 A. I did not.
 6 Q. And other than talking to counsel at some
 7 point, which we know you did, did you ever seek
 8 internal advice, nonlawyer advice, advisor, a
 9 professor like -- and I'll just give you a
 10 simple example. Like "What in the world is
 11 this? What is the complaint?" I assume before
 12 you had never seen a formal EOD complaint. Is
 13 that correct?
 14 A. Correct, I had not.
 15 Q. So did you seek any -- other than attorneys,
 16 any kind of internal advice to help you --
 17 guide your path?
 18 A. At the time the complaint was filed, I did not.
 19 Q. And you met with -- I'm going to show you
 20 Exhibit C.
 21 A. Okay.
 22 MR. BAXTER: Did we do B already or are we
 23 skipping it?
 24 MR. CARROLL: No, I'm just -- This should
 25 be C, "Marcus Miller" at the top.

1 MR. BAXTER: Okay.
 2 Q. I want to direct your attention to this. Let's
 3 go through C. My understanding is -- And just
 4 so you understand how this works, the top just
 5 means it was printed by Constance's email
 6 system.
 7 A. Yes.
 8 Q. Okay. But the substance of it is an email from
 9 you to Marcus Miller. Correct?
 10 A. Correct.
 11 Q. And it's dated June 22, 2016?
 12 A. Yes.
 13 Q. Okay. And why were you writing him at this
 14 time?
 15 A. In response to an email he had sent me
 16 previously.
 17 Q. So then when we move through C and see at the
 18 bottom, there's page numbers.
 19 A. Yes.
 20 Q. Okay. I want to direct your attention to --
 21 Well, let me ask you this: Did you ever tell
 22 Ms. Cervantes that you did not select Marcus
 23 because he was gay?
 24 A. No.
 25 Q. Okay. Now, there's a difference between saying

1 "our beliefs clashed" or saying "he wasn't
 2 picked because he's gay." Do you appreciate
 3 that difference?
 4 A. Yes.
 5 Q. Okay. And so if Miss Cervantes' testimony is
 6 that you did tell her that he wasn't picked
 7 because he was gay, would you disagree with her
 8 recollection?
 9 A. Yes.
 10 Q. Would you look to page -- this exhibit at the
 11 bottom, 2783.
 12 A. (The witness complied.)
 13 Q. Do you see that? I mean do you have the right
 14 page?
 15 A. Yes.
 16 Q. And pretty much at the middle, and I will
 17 represent to you these are Miss Cervantes'
 18 handwritten notes of the interview, and if you
 19 want to acclimate yourself to it, you can back
 20 up where -- 2780.
 21 A. Yes.
 22 Q. This appears to be your meeting with
 23 Miss Cervantes.
 24 A. Yes.
 25 Q. Does that square with your memory, 3-2-17?

1 A. Yes.
 2 Q. So Miss Cervantes is in the meeting,
 3 Miss Sager, and Mr. Baker.
 4 A. That's correct.
 5 Q. Did you know Mr. Baker before this meeting?
 6 A. I did not.
 7 Q. Okay. So I will represent to you that these
 8 are Miss Cervantes' handwritten notes of that
 9 meeting.
 10 A. Yes.
 11 Q. Did you notice her taking the notes as you
 12 spoke?
 13 A. Yes.
 14 Q. Then if you go to 2783, the page we were on
 15 before on the bottom --
 16 A. Yes.
 17 Q. -- right in the middle, do you see where it
 18 says, "At next meeting"?
 19 A. Yes.
 20 Q. Then, "At next meeting," that word's hard to
 21 read, "4-27 MM," I believe it means Marcus
 22 Miller, "would have become vice president."
 23 Now, I will represent to you Miss Cervantes'
 24 testimony is that this is what you told her.
 25 Did you tell her Marcus Miller would have

1 become vice president and it says "by
2 acclimation." I assume that just means we all
3 agree, you don't even have to vote. Is that
4 what you meant by that? If you used the word,
5 is that what you meant?
6 A. I don't believe I used that word.
7 Q. Okay. All right. Is it fair to say that he
8 had all the qualifications except either his
9 status or his beliefs to be vice president of
10 your group?
11 A. Would you clarify status or beliefs?
12 Q. Well, he was gay, and his beliefs apparently
13 clashed with BLinC's beliefs. But otherwise,
14 he was imminently qualified, was he not?
15 A. He was qualified.
16 Q. Did you say to Miss Cervantes he would have
17 become vice president, and if you didn't use
18 the word acclimation, that's fine. He would
19 have become -- "Marcus Miller would have become
20 VP if had not told was gay." Did you use those
21 words?
22 A. I don't remember if I specifically used those
23 words.
24 Q. Did you ever say it was a belief disconnect?
25 A. Yes. A lot. I don't know that I would say

1 that was clearly communicated through the
2 notes. I -- If you would allow me to
3 continue.
4 MR. BAXTER: Just answer the question that
5 he's asking, that's fine.
6 MR. CARROLL: Yes.
7 Q. So at the time of Marcus Miller, what was
8 BLinC's mission statement or statement of
9 faith, if any?
10 A. Our mission statement word for word or --
11 Q. No, just in essence.
12 A. Okay. In essence, our mission statement was to
13 gather as Christians and to keep Christ first
14 in the business world, using the Bible as a
15 guide.
16 Q. And I believe the record indicates that your
17 group invited speakers?
18 A. That's correct.
19 Q. Did they speak on campus?
20 A. Within our group?
21 Q. For example, if you --
22 A. They came.
23 Q. -- invited a speaker, was it in the College of
24 Business?
25 A. Yes.

1 Q. And that was in a University of Iowa room?
2 A. Yes.
3 Q. What was the criteria to select a speaker?
4 A. Typically we would have had -- been introduced
5 previously. We would have had a few
6 conversations in order to set up the meeting
7 for them to visit our organization. We would
8 have talked about the content that they were
9 going to go over. We would have told them what
10 our purpose and our mission was, and typically
11 our speakers were referred to us from an
12 advisor or someone within the group that knew
13 of someone who would be helpful and beneficial
14 for our group to hear from.
15 Q. Is the fundamental premise of BLinC within the
16 business community to continue to believe in
17 Christ as you read the Bible? I mean it's
18 Business Leaders in Christ. It doesn't say
19 "Liberal Arts Leaders in Christ."
20 A. Correct.
21 Q. Is the fundamental notion that it's kind of
22 being driven in part because you're business
23 majors. Is that fair?
24 A. That's fair.
25 Q. All right. The speakers, were they in the

1 business world?
2 A. Yes.
3 Q. And some of them were referred to you by
4 University of Iowa advisors?
5 A. Yes.
6 Q. And some were referred to you by what, other
7 speakers?
8 A. Other speakers or members of our group.
9 Q. And did those speakers, for example, when they
10 would present, would they describe where they
11 worked?
12 A. Yes.
13 Q. And what their jobs were?
14 A. Yes.
15 Q. Were they all in the business world?
16 A. They all had business backgrounds.
17 Q. Do you know if any of them worked for major
18 employers?
19 A. Yes.
20 Q. And the speakers, what was the level of their
21 hierarchy in the organization? Vice president?
22 President?
23 A. We had many speakers, so the -- it ranged.
24 Q. Okay.
25 A. But some were owners of businesses, some were

1 executives, some were administrative.
 2 Q. And what are some of the examples, if you can
 3 remember, of businesses, that's where they
 4 worked. Where did they work?
 5 A. Rockwell Collins.
 6 Q. Okay.
 7 A. ACT, Launch Services, Thrivent Financial.
 8 Q. Is that the name of a company or just that's
 9 the area?
 10 A. Thrivent Financial is --
 11 Q. Thrivent. I thought you said "private."
 12 A. Yes, Thrivent.
 13 Q. I recognize the name.
 14 A. Yes. Off the top of my head that's what I can
 15 recall.
 16 Q. And that's fine. With those organizations, are
 17 you aware if they have nondiscrimination based
 18 on sexual orientation as an employer?
 19 A. I'm not aware. I'm not aware.
 20 Q. Are you employed?
 21 A. I am.
 22 Q. Where do you work?
 23 A. I work for a church.
 24 Q. Okay. And is that -- what's your -- I mean are
 25 you still in the business world within the

1 church?
 2 A. I do administrative work.
 3 Q. And you're not aware whether ACT, Rockwell
 4 Collins, or Thrivent Financial have
 5 nondiscrimination policies?
 6 A. I'm not familiar with their policies.
 7 Q. Would it surprise you if they had extremely
 8 strong nondiscrimination policies?
 9 A. No.
 10 Q. Okay. Did you ever intern with a major
 11 employer?
 12 A. What do you define as major?
 13 Q. Well, ACT has approximately 5,000 employees,
 14 Rockwell Collins has over 70,000.
 15 A. I did not.
 16 Q. That's -- I'm just -- Major to me is 70,000.
 17 A. Sure. I did not.
 18 Q. Like CenturyLink or AT&T. Those are major
 19 employers.
 20 A. Um-hmm.
 21 Q. Okay.
 22 A. I did not.
 23 Q. So when you interviewed with Miss Cervantes,
 24 were you given the opportunity -- whether she
 25 agreed with you or took the notes down

1 correctly, were you given the opportunity to
 2 explain your position on behalf of BLinC?
 3 A. I was given my opportunity. I was given an
 4 opportunity. However, I felt pressure, and I
 5 didn't feel like they were really understanding
 6 what I was saying. I felt a little bit
 7 bullied, to be honest, in the meeting.
 8 Q. By Miss Cervantes or the group?
 9 A. I would say by Miss Cervantes, also by Tom
 10 Baker.
 11 Q. Okay. And did you ever interview with
 12 Miss Cervantes again?
 13 A. I did not.
 14 Q. Is there any reason you didn't take a -- I mean
 15 you had all the options to bring an advocate.
 16 Is there any reason you didn't?
 17 A. I believe it's stated in my declaration, but
 18 I -- when I received the complaint, you
 19 correctly assume I'd never seen a complaint
 20 similar to that and it, if I remember
 21 correctly, described that should I talk with
 22 other people about the complaint, I potentially
 23 could -- that could be considered retaliation,
 24 so I wanted to honor that and respect that. I
 25 spoke -- I didn't speak with anyone from the

1 university about it. I also thought
 2 potentially that if I spoke with a lawyer or
 3 someone else, I might be in violation of that
 4 statement of retaliation.
 5 Q. And you understand the complaint was actually
 6 lodged against BLinC.
 7 A. I do.
 8 Q. So you weren't named individually.
 9 A. Correct.
 10 Q. Correct?
 11 A. Correct.
 12 Q. So when you were interviewed, was it your
 13 understanding you were there as the then
 14 president of BLinC?
 15 A. Yes. Well, I don't know if I correctly made
 16 that distinction, actually.
 17 Q. And, of course, you were a fact witness.
 18 A. Yes.
 19 Q. Because you interviewed Mr. Miller.
 20 A. Yes.
 21 Q. And did you alone ultimately make the decision
 22 that it's not going to be a good fit?
 23 A. Not alone.
 24 Q. Okay. Who else helped?
 25 A. Kolton Dahms and Nate Wells.

1 Q. Can you spell Mr. Dahms' name?
 2 A. Sure, D A H M S.
 3 Q. And do you know where they are currently?
 4 A. I do.
 5 Q. And where are they?
 6 A. Kolton lives in Texas and Nate lives here in
 7 Iowa City.
 8 Q. Have they both graduated from Iowa?
 9 A. They have.
 10 Q. Do you know where Nate works?
 11 A. I do not at the moment. I don't know.
 12 Q. So is it fair to say that you didn't make the
 13 decision about Mr. Miller on your own?
 14 A. I did not.
 15 Q. Are those the only two other individuals that
 16 were part of that decision-making?
 17 A. Yes.
 18 Q. And under your constitution or bylaws, did you
 19 and the two others have the authority to say no
 20 to this individual?
 21 A. Yes.
 22 Q. Okay. So, for example -- I know your group
 23 wasn't big, but you don't have a membership
 24 vote?
 25 A. Not -- not if we have -- not if that person was

1 not eligible. Does that make sense?
 2 Q. Yes. So, for example, you were the founder. I
 3 assume you became president by that fact alone.
 4 Is that fair?
 5 A. Not necessarily.
 6 Q. How did you become president then?
 7 A. Election.
 8 Q. And who elected -- I mean let's just say this:
 9 Who are the eligible electors?
 10 A. The members.
 11 Q. But all members?
 12 A. I would say the executive team.
 13 Q. And, see, that's the distinction I'm trying to
 14 figure out.
 15 A. Okay.
 16 Q. So, for example, if I'm an undergrad student at
 17 Iowa and I believe in your faith statement or
 18 mission statement -- I'm going to use those
 19 interchangeably.
 20 A. Okay.
 21 Q. I believe in it, I meet all the academic
 22 criteria, whatever, I meet all the criteria to
 23 be in your group, do I get to vote who the
 24 leaders are? And I'm only a member. I don't
 25 want to be a leader, I'll come to the meetings,

1 I agree with everything you're saying, but do I
 2 get to vote who will lead us?
 3 A. At a certain point in the process, yes.
 4 Q. And is that in your bylaws or constitution that
 5 membership selects leaders?
 6 A. Yes.
 7 Q. And so when you said a certain point in the
 8 process, what point do I have to hit where I
 9 get to vote?
 10 A. Typically, not just in this instance, but in
 11 other instances, there would be a conversation
 12 had with the person who is interested to see if
 13 they agreed with our beliefs. If they
 14 understood the position, what it entailed and
 15 after that conversation, we would decide if it
 16 was a good fit to move forward or if it was not
 17 a good fit.
 18 Q. And so if I don't pass your test and -- I mean
 19 the test of -- in this case it was three.
 20 A. Yes.
 21 Q. If I don't pass that test, I don't get to the
 22 membership vote. Is that fair?
 23 A. That's fair.
 24 Q. All right. So members -- Is it also fair,
 25 therefore, members don't get to select its own

1 leaders?
 2 A. I would say that's fair.
 3 Q. Could Mr. Miller instead have gone to the
 4 meeting -- He was still eligible as a member,
 5 correct?
 6 A. Um-hmm.
 7 Q. Yes?
 8 A. Yes.
 9 Q. Could Mr. Miller have come to the next meeting
 10 and said, "I want to be a vice president and
 11 here's what I believe and I want a full vote."
 12 Could he have done that? Now, what I mean is
 13 would it have been effective, or have you --
 14 you in your leadership, have you effectively
 15 stopped his ability to be a leader?
 16 A. That could be effective.
 17 Q. Now, do you agree that part of the reason for
 18 student groups is the discourse of ideas?
 19 A. Yes.
 20 Q. And embracing diverse opinions, in part?
 21 A. Yes.
 22 Q. And, of course, you were in classrooms where, I
 23 assume -- and I'm going to take religion out of
 24 it. I'm sure you've been in an economics
 25 class -- well, maybe not -- but where people

1 fundamentally disagree over economic policy.
 2 A. Yes.
 3 Q. Okay. The professor's teaching the two avenues
 4 of economic policy for the United States. One
 5 student should be free to speak, "This is
 6 correct."
 7 A. Yes.
 8 Q. And the other student should be free to speak,
 9 "No, it's wrong and here's why."
 10 A. Yes.
 11 Q. Okay. As long as there's some logic to the
 12 argument --
 13 A. Yes.
 14 Q. -- it's a fair conversation, isn't it?
 15 A. Yes.
 16 Q. So in this case, Mr. Miller essentially was
 17 denied the ability to say, you know, "I do
 18 disagree with your beliefs but hear me out."
 19 A. He was not denied that ability.
 20 Q. Okay. He was denied it from your point of
 21 view, but he could have come to the next
 22 meeting?
 23 A. Yes.
 24 Q. And he didn't.
 25 A. He didn't.

1 Q. All right. And so is your group, "If you don't
 2 hold our fundamental beliefs, you're not
 3 welcome"?
 4 A. No.
 5 Q. Okay. When --
 6 MR. BAXTER: Just for clarification, when
 7 you say no, I mean you're asking the question.
 8 Can you restate the question.
 9 MR. CARROLL: Read it back, please.
 10 (Requested portion of the record was read
 11 by the reporter.)
 12 Q. So let me just -- Are you welcome if I don't
 13 hold all beliefs?
 14 A. Yes.
 15 Q. Where is the line of demarcation? Is it
 16 Mr. Miller?
 17 A. No.
 18 Q. But clearly, you said he's not a fit, so
 19 where -- is he the top of the list? He
 20 fundamentally disagrees with our mission
 21 statement and that's so clear-cut? When does
 22 the line of demarcation stop, I mean? What can
 23 I disagree with and still be a member in good
 24 standing?
 25 A. Sure. In your words, he is more than welcome

1 to be a member of our group. He is not a great
 2 fit for leadership within our group.
 3 Similarly, if someone worked for the University
 4 of Iowa, however, did not want to -- did not
 5 want to exist to further the mission of the
 6 University of Iowa, they would not be a good
 7 fit at the University of Iowa.
 8 Q. Okay. And so one of your --
 9 A. However --
 10 Q. Oh, go ahead.
 11 A. -- they could attend the university and be a
 12 member of the community.
 13 Q. And one of your belief statements is that
 14 marriage is between a man and a woman?
 15 A. Yes.
 16 Q. It may say "husband and wife," I don't know,
 17 but you know what I mean.
 18 A. Yes.
 19 Q. Okay. So the fundamental belief is that at
 20 this point in time -- 2017, 2016 -- you knew
 21 that gay marriage in Iowa was lawful. Correct?
 22 A. Yes.
 23 Q. Okay. And that, in fact, same-sex couples have
 24 married lawfully in the state of Iowa.
 25 A. Yes.

1 Q. And they have all the benefits of a married
 2 couple under all the rules. Correct?
 3 A. Correct.
 4 Q. So when your belief statement is marriage is
 5 between a man and a woman, you are excluding
 6 lawfully married people. Is that correct?
 7 A. That's correct.
 8 Q. And that's because of your belief system?
 9 A. That's because we are a religious organization,
 10 yes.
 11 Q. So I mean it's your belief system.
 12 A. Yes, that's our belief system.
 13 Q. And it's not based on their status?
 14 A. Correct.
 15 Q. Then moving forward, who replaced or if there
 16 was still a vacancy, who became the opening
 17 that Marcus Miller applied for?
 18 A. Nobody filled that position.
 19 Q. Okay.
 20 A. For that -- the duration of that year.
 21 Q. And was that -- was it an open position or
 22 newly created?
 23 A. It was an open -- Would you mind clarifying?
 24 Q. Well, sometimes you can create a new position
 25 and not fill it.

1 A. Sure.
 2 Q. Or sometimes it already exists and somebody
 3 graduated. Like you graduated. There must be
 4 a new president.
 5 A. Yes. Yep.
 6 Q. So my question is was it newly created, or
 7 somebody left and so now we had a vacancy?
 8 A. Somebody had left so there was a vacancy.
 9 Q. And for whatever reason, it wasn't filled?
 10 A. Correct.
 11 Q. And if you would look to Exhibit B, please.
 12 I'll hand you that. I have to make sure I've
 13 got my stacks right.
 14 MR. CARROLL: Here's B. That should be B
 15 for you.
 16 Q. Are you familiar with B?
 17 MR. BAXTER: Just objection. Are you
 18 asking about all of the documents in B or just
 19 the top document?
 20 MR. CARROLL: All of them.
 21 MR. BAXTER: Okay.
 22 A. I'm not familiar with all of them.
 23 Q. All right. Let's go through the ones -- You
 24 are familiar with the first page of B, correct?
 25 A. Yes.

1 Q. Okay. This is Miss Cervantes' findings.
 2 Correct?
 3 A. Yes.
 4 Q. Did you receive it?
 5 A. Yes.
 6 Q. And you received it as president of BLinC?
 7 A. I did.
 8 Q. And you read it?
 9 A. Actually, I was not the president at the moment
 10 when I received it.
 11 Q. Okay.
 12 A. I had graduated.
 13 Q. But you did receive it.
 14 A. I did.
 15 Q. All right. And this is what kind of started
 16 this -- what we're in today, right, the finding
 17 that BLinC violated the human rights policy?
 18 A. Yes.
 19 Q. Okay. What was your role moving forward as far
 20 as you have this finding. Did you have any
 21 role moving forward to challenge it, to meet
 22 with University of Iowa officials?
 23 A. Upon receiving the finding, I spoke with the
 24 incoming president and executive team,
 25 consulted legal counsel.

1 Q. And which counsel did you consult?
 2 A. I consulted the current men in the room.
 3 Q. Okay. How did you get to those men?
 4 A. Someone referred them to us.
 5 Q. Okay. And at this point in time -- And I
 6 won't ask you what you consulted about, but you
 7 were actively consulting with the attorneys?
 8 A. At this time, yes.
 9 Q. Okay. And was the purpose to seek --
 10 MR. BAXTER: I object.
 11 MR. CARROLL: Well, I'm going to ask it.
 12 Q. Was the purpose -- Without getting into what
 13 you were told, was your purpose to just simply
 14 see what your options are?
 15 MR. BAXTER: I'm going to instruct you not
 16 to answer that.
 17 MR. CARROLL: Okay.
 18 Q. How many times did you speak with outside
 19 counsel? And, I'm sorry, they're really not
 20 outside counsel. How many times did you speak
 21 with counsel over anything related to BLinC
 22 without talking about what the substance is?
 23 MR. BAXTER: I object and instruct you not
 24 to answer. There's no need to know how many
 25 times. It goes into legal strategy.

1 MR. CARROLL: These are foundational
 2 questions, so I would ask that --
 3 Q. Are you going to take your lawyer's advice and
 4 not answer?
 5 A. Yes.
 6 Q. All right. So as the date of this finding, you
 7 had -- did you graduate in May of 2017?
 8 A. Yes.
 9 Q. Okay. So at this point other than potentially
 10 being a fact witness and a facilitator with
 11 counsel, you really weren't in a position of
 12 decision making for BLinC, were you?
 13 A. Correct.
 14 Q. Yet, as it moved forward, you did write letters
 15 to the University of Iowa. Correct?
 16 A. No.
 17 Q. So after you graduated, you had no
 18 communication with Iowa?
 19 A. In regards to this matter, no.
 20 Q. Yeah. And we're only talking about this matter
 21 today.
 22 A. No.
 23 Q. So in Exhibit B, can you look at page 2592 at
 24 the bottom.
 25 A. Yes.

1 Q. Do you know what that is?
 2 A. Yes.
 3 Q. What is it?
 4 A. BLinC's statement of faith.
 5 Q. When was it created?
 6 A. August 2016.
 7 Q. Is this the August one?
 8 A. Yes.
 9 Q. Okay. And was there another --
 10 MR. BAXTER: Would you identify what the
 11 document is, for the record, or ask her to
 12 identify it? Is this the August -- Is there
 13 any reason why you know this is the August
 14 document?
 15 THE WITNESS: No.
 16 MR. BAXTER: The August document hasn't
 17 been identified for the record. You asked
 18 about the August document.
 19 MR. CARROLL: No, I asked her if she was
 20 familiar. She --
 21 MR. BAXTER: You said, "Is this the August
 22 document," and I don't know if you can lay a
 23 foundation for that.
 24 MR. CARROLL: Well, if I did, I misspoke
 25 because I don't know --

1 Q. Are you familiar with this document, page 2592?
 2 A. I am.
 3 Q. Did you help create it?
 4 A. Yes.
 5 Q. Okay. Do you know when it was created?
 6 A. Yes.
 7 Q. When was it created?
 8 A. August 2016.
 9 Q. Okay. And were you aware that as this matter
 10 moved forward, individuals from BLinC and your
 11 counsel met with University of Iowa
 12 individuals?
 13 A. I am aware.
 14 Q. Okay. Were you aware at the time?
 15 A. What time?
 16 Q. At the time of the meeting, contemporaneously.
 17 Like this meeting's going to happen.
 18 A. I don't believe I was.
 19 Q. Okay. Were you part of the result of the
 20 meeting to amend BLinC's constitution or
 21 bylaws?
 22 A. I was not.
 23 Q. You were graduated, no longer the president.
 24 Correct?
 25 A. Correct.

1 Q. Okay. So is it fair to say after the finding
 2 when you had already graduated, although you
 3 still had fact knowledge, what occurred with
 4 Mr. Miller, you really aren't involved as BLinC
 5 moves forward. Is that fair?
 6 A. I -- I would say I care about the organization.
 7 Q. What I mean is you had no responsibility to say
 8 "Yes, we can do that." "No, we can't do that."
 9 A. Correct.
 10 Q. Okay.
 11 A. Unless someone sought my counsel.
 12 Q. And that would be advisory.
 13 A. Sure.
 14 Q. Is that fair?
 15 A. That's fair.
 16 Q. They could disagree with you, right?
 17 A. Yep.
 18 Q. I mean you're a BLinC alumni --
 19 A. Yes.
 20 Q. -- but somebody else is running the group now.
 21 A. Definitely, yes.
 22 Q. And would you look at -- I'll hand you Exhibit
 23 D. Are you familiar with Exhibit D?
 24 A. No.
 25 Q. And you haven't seen this before?

1 A. I haven't.
 2 Q. All right. Again, and I'll represent to you
 3 these are Miss Cervantes' typewritten notes of
 4 your interview. Do you see it says "Hannah
 5 Thompson Interview"?
 6 A. Yes.
 7 Q. And that date also coincides with when you were
 8 interviewed? If you want to look at the
 9 handwritten notes, you can.
 10 A. Was that C?
 11 Q. Yes.
 12 A. Yep.
 13 Q. And the same individuals identified in the
 14 handwritten notes are listed as present,
 15 correct?
 16 A. Yes.
 17 Q. Okay. And again, your testimony is that you
 18 never told Miss Cervantes that it's because
 19 Mr. Miller was gay that he wasn't selected?
 20 A. I do not recall that.
 21 Q. So if you look at 2768, at the second paragraph
 22 that starts "MM."
 23 A. Sure.
 24 Q. Do you see where "MM would have been eligible
 25 but for being gay. MM would have become VP at

1 the April 27th meeting," again "by acclimation,
 2 if he had not told them he was gay." That at
 3 least, whether you agree with that statement or
 4 not, at least is consistent with her typing of
 5 her handwritten notes?
 6 A. Yes.
 7 Q. Okay. So she didn't add -- It doesn't appear
 8 that she added any words there.
 9 A. Correct.
 10 Q. For example, if she had misunderstood what you
 11 said or you both disagree with what was said,
 12 it's -- from this sentence alone, it's clear
 13 she's not adding anything after the fact. Is
 14 that fair?
 15 A. Yes.
 16 Q. Okay. And I believe you testified you haven't
 17 seen this before. Correct?
 18 A. Correct. Not the typed document.
 19 Q. Right. And other than talking with your
 20 attorneys, have you looked at the documents in
 21 this matter? And I'll be more specific.
 22 A. Yes, please.
 23 Q. Any level of detail.
 24 A. I've looked -- I mean I'm familiar with the
 25 documents because a lot of them were written by

1 me, I guess.
 2 Q. Okay.
 3 A. Or a team of individuals.
 4 Q. And so I'm going to hand you Exhibit E, and are
 5 you familiar with Exhibit E?
 6 A. Yes.
 7 Q. And why are you writing -- Well, let me ask
 8 you this: What is Exhibit E?
 9 A. Exhibit E is an email I sent on 6-22-16 to
 10 Marcus.
 11 Q. And why are you sending this email?
 12 A. In response to an email he sent to me.
 13 Q. And are you familiar with the document?
 14 A. Yes.
 15 Q. So when you -- the third paragraph, "I want to,
 16 most importantly" -- Do you see where I'm at?
 17 A. Yes.
 18 Q. -- "clarify what I desired to convey to you,
 19 and I apologize if what follows was not clearly
 20 communicated." What are you talking about
 21 there?
 22 A. When I received the email that he had sent to
 23 me, it was brought to my attention that things
 24 were not as clear as what I believed happened
 25 in the meeting; thus, I wanted to clarify --

1 Q. And when you say not as clear -- Excuse me, I
 2 don't mean to interrupt you.
 3 A. Sorry. Wanted to clarify in writing what we
 4 had discussed.
 5 Q. And when you say not as clear, is that only
 6 between you and Mr. Miller?
 7 A. That conversation?
 8 Q. Well, you said it wasn't as clear as you
 9 thought. Were the other people saying, "Hey,
 10 Hannah, we didn't understand what you just told
 11 Marcus," or was it just between you and Marcus?
 12 A. I'm a little confused.
 13 Q. Okay.
 14 A. If you don't mind.
 15 Q. You wrote this to clarify something, correct?
 16 A. Correct.
 17 Q. How did it come to your attention something was
 18 unclear?
 19 A. His email to me.
 20 Q. And what was unclear to him?
 21 A. It was unclear to him why we did not allow him
 22 the position on the executive board.
 23 Q. And at this point in time, he was told he would
 24 not be a leader?
 25 A. He had understanding he wasn't going to be a

1 leader, is that correct?
 2 Q. Yes.
 3 A. Yes.
 4 Q. But then more specifically, was he told?
 5 A. Yes.
 6 Q. Okay. And so now in this same -- the middle
 7 paragraph we've been looking at, there's a --
 8 "I could not allow you to be in a leadership
 9 position within BLinC is because of your desire
 10 to pursue a homosexual lifestyle/relationship."
 11 Okay. See how you put "I could not allow you"?
 12 A. Sure.
 13 Q. That isn't the same as "We could not allow
 14 you." Did you make this decision?
 15 A. Correct. I made it in communication with our
 16 executive team.
 17 Q. Is there any reason you didn't use "we" or
 18 "executive team decided"?
 19 A. I would say no, there's not really a reason why
 20 I didn't use the word "we." I think this was
 21 writing -- this was from -- coming from me.
 22 Q. Okay. But it is fair to say that you didn't
 23 make the decision alone.
 24 A. That's correct.
 25 Q. And in this letter, you do say, "because of

1 your desire to pursue a homosexual lifestyle/
 2 relationship." Isn't that his status as a gay
 3 man?
 4 A. Yes.
 5 Q. So you're identifying the reason he can't be a
 6 leader is because of his status.
 7 A. I would say if you read further on, there are
 8 other implications of the word "pursue."
 9 Q. But when this sentence, you didn't say,
 10 "Because you don't" -- at least in this
 11 sentence, "you do not agree with our belief
 12 system."
 13 A. Correct.
 14 Q. Do you think anybody at the University of Iowa
 15 could read this document and think the decision
 16 was made regarding Mr. Miller because of the
 17 fact he was gay?
 18 A. Perhaps someone could come to that
 19 understanding.
 20 Q. Could Miss Cervantes?
 21 A. Perhaps.
 22 Q. In this case as it moved forward, other than
 23 being involved in litigation -- you're here
 24 today -- were you involved in any of the
 25 decision-making, without talking about lawyers,

1 to appeal what the University of Iowa's
 2 proposing to do to BLinC?
 3 A. To be honest, I don't remember the timeline, so
 4 I can't speak confidently.
 5 Q. Okay. Did you understand that Mr. Nelson from
 6 the University of Iowa essentially deregistered
 7 BLinC?
 8 A. Yes, I was aware of that.
 9 Q. And that came after your graduation.
 10 A. Yes.
 11 Q. So somebody told you.
 12 A. Yes.
 13 Q. Did you live in the Twin Cities by then?
 14 A. Yes.
 15 Q. Okay. And as that was unfolding, were you
 16 involved in the process to appeal to at the
 17 time Dr. Lyn Redington?
 18 A. No.
 19 Q. Is it fair at some point it really -- other
 20 than this litigation, it was out of your hands
 21 on behalf of BLinC?
 22 A. Yes.
 23 Q. Okay. I mean I know you're vitally interested
 24 in this, but you're truly not a decision maker
 25 anymore. Right?

1 A. Yes, I understand. Yeah.
 2 Q. Were you in any manner involved exploring --
 3 and again, not with your attorneys but either
 4 with the then current leadership of BLinC, were
 5 you in any manner involved in exploring what
 6 appellate options BLinC would have?
 7 A. Could you restate the question, please?
 8 Q. Yes. Do you understand that Dr. Nelson made a
 9 decision and that was -- Maybe you don't
 10 understand. I'll ask you if you do, that then
 11 that decision was appealed to Dr. Redington?
 12 A. I did not know that.
 13 Q. Okay. So do you know what Dr. Redington's
 14 decision was?
 15 A. Yes.
 16 Q. She affirmed Dr. Nelson.
 17 A. Yes.
 18 Q. So with respect to the next steps, were you
 19 involved in exploring what options you had
 20 within the University of Iowa to appeal
 21 Dr. Redington's decision?
 22 A. I was not.
 23 Q. So is it fair to say that you don't know what
 24 appellate rights existed?
 25 A. Yes.

1 Q. Had you ever been involved in an appeal through
 2 internal procedures?
 3 A. No.
 4 Q. Then I want to ask you if you could go back to
 5 the deposition notice.
 6 A. Sure. Exhibit A?
 7 Q. Yeah, it's A. If you could look to that list
 8 of topics.
 9 A. Yes.
 10 Q. I want to ask you specifically Number 5. Do
 11 you have -- Did BLinC have any scholarship
 12 programs?
 13 A. No.
 14 Q. Are there any scholarship programs that your
 15 organization -- by scholarship -- Let me take
 16 away scholarship because that's academic.
 17 Let's talk about funding, grants. We've
 18 already talked about just as a registered
 19 organization you have certain rights, but did
 20 you have any funding by any other groups or
 21 entities that supported BLinC?
 22 A. Outside of the university?
 23 Q. Yes.
 24 A. Yes.
 25 Q. Okay. And what was the source of the funding?

1 A. A donation from Thrivent Financial.
 2 Q. Okay. And did that have restrictions?
 3 A. Not any that were discussed.
 4 Q. So, for example -- and maybe you're not
 5 familiar but, you know, donors give money to
 6 the University of Iowa all the time.
 7 A. Yeah.
 8 Q. And sometimes they say, "But this is the only
 9 thing you can use the money for."
 10 A. Yes.
 11 Q. Did Thrivent's funding have restrictions like
 12 you can only use it for X?
 13 A. No.
 14 Q. Okay. So it was up to your discretion to spend
 15 the money?
 16 A. Yes. Yep.
 17 Q. What was the source -- not the source. What
 18 was the approximate amount of the money?
 19 A. I do not remember.
 20 Q. That's fine. Then if we would look to Exhibit
 21 F. Do you recognize Exhibit F?
 22 A. Yes.
 23 Q. And would you just take a moment to look at it.
 24 I've clipped it, and I want to make sure I
 25 clipped what you were referring to.

1 Does that appear to be an accurate
 2 clipping of your declaration?
 3 A. Yes.
 4 Q. Okay. And what was the purpose -- Without
 5 telling me what your lawyers were telling you,
 6 if you know, what was your purpose of signing a
 7 declaration?
 8 A. In order to recount what happened and my
 9 involvement.
 10 Q. Okay. And part of this declaration talks about
 11 the fact that you provide spiritual guidance to
 12 others. Is that fair?
 13 A. Yes.
 14 Q. And is that simply as a layperson?
 15 A. Yes.
 16 Q. Was that within the -- I know it's in your
 17 declaration. Was that within the BLinC's
 18 bylaws or constitution?
 19 A. I don't know if it was explicitly stated.
 20 Q. And with respect to, for example, I believe
 21 your mission statement was essentially marriage
 22 is between a man and a woman, and intercourse
 23 outside of marriage is not proper. Is that
 24 fair?
 25 A. I don't know that I would say that's our

1 mission statement.
 2 Q. Okay. Am I summarizing your beliefs correctly
 3 in that regard?
 4 A. A portion, yes.
 5 Q. And so let's just say you had a member who was
 6 in good standing that said, "Oh, I just had a
 7 sexual relationship with my girlfriend."
 8 A. Yes.
 9 Q. Is that the type of spiritual advice you might
 10 provide?
 11 A. Could you clarify?
 12 Q. Well, if I come to you and it's clear I
 13 violated one of your tenets --
 14 A. Sure.
 15 Q. -- would you say, "Oh, let's talk about it"?
 16 Is what the kind of spiritual advice like, you
 17 know, when I look at these emails, even some
 18 you say to Marcus, "I'm going to pray about
 19 this decision."
 20 A. Yes.
 21 Q. Okay. So when we look at Exhibit F, in your
 22 declaration, you're essentially summarizing
 23 your knowledge as this unfolded?
 24 A. Yes.
 25 Q. Okay. And is there anything about this

1 declaration that isn't true and accurate?
 2 A. Nope.
 3 Q. So when we look at page 8 of your
 4 declaration --
 5 A. Yes.
 6 Q. -- see paragraph 44?
 7 A. Yes.
 8 Q. "BLinC has always desired to cultivate a
 9 welcoming environment."
 10 A. Yes.
 11 Q. How do I feel welcome if I'm openly gay?
 12 A. More than welcome to come to our meetings, more
 13 than welcome to engage in relationships with
 14 others during the meetings, welcome to state
 15 their opinions and beliefs. We had no problem
 16 with that.
 17 Q. So I could come to the meeting openly gay and
 18 say, "Your mission statement's wrong.
 19 Actually, you're the people that are committing
 20 the sin"?
 21 A. Yeah.
 22 Q. By excluding me.
 23 A. Yes.
 24 Q. Do you agree that gay people are human beings?
 25 A. Yes, a hundred percent.

1 Q. Do you agree that they have status equal to
 2 you?
 3 A. Yes.
 4 Q. So they're welcome to be a member but not to be
 5 a leader.
 6 A. Correct.
 7 Q. But as a member, I can espouse the exact
 8 opposite of your belief system.
 9 A. Sure.
 10 Q. Why can't I do it as a leader?
 11 A. If we don't have leaders who uphold our beliefs
 12 and want to accomplish the mission of our
 13 organization, there's no purpose of our
 14 organization if nobody is in place to
 15 accomplish that mission with the -- That's it.
 16 Q. What happens if every member -- There's three
 17 leaders.
 18 A. Sure.
 19 Q. You're espousing your mission. Every member's
 20 openly gay. How do you exist?
 21 A. How do we exist?
 22 Q. Yeah.
 23 A. Well, we continue to meet, we continue to talk
 24 about how to honor God with our life, and we
 25 might disagree on that, but I -- I don't see

1 Q. Well, doesn't your mission -- isn't one of
 2 the -- whether a faith statement or mission
 3 statement, isn't it that a marriage is between
 4 a man and a woman?
 5 A. Yes. We believe that, yes.
 6 Q. So do you know any -- When you were an
 7 undergrad, did you know any married college
 8 students?
 9 A. Yes.
 10 Q. Did you know any same-sex college --
 11 A. Yes.
 12 Q. Would they be welcome to your group?
 13 A. Yes.
 14 Q. And wouldn't they, in fact, in all likelihood
 15 be espousing, "We are people, too, and your
 16 ideas about God are wrong"?
 17 A. Sure.
 18 Q. Do you believe that same-sex couples, married
 19 or nonmarried, believe in the same God you do?
 20 MR. BAXTER: I'm going to object to the
 21 extent it calls for speculation, but you can
 22 answer if you think you can.
 23 A. I think that's a loaded question.
 24 Q. Well, loaded or not, if you can't answer it,
 25 just say that.

1 any problems with someone being openly gay and
 2 being a member of our organization.
 3 Q. So the entire membership is openly gay, the
 4 leadership is not. Are you spending your time
 5 converting the openly gay people?
 6 A. No.
 7 Q. So explain to me, if you can, how the group can
 8 move forward if the only people who are joining
 9 the group are openly gay.
 10 A. In our beliefs and as Christians, our faith has
 11 implications in every area of our life and
 12 that's what we believe, which is why this
 13 situation was a concern and not just written
 14 off in terms of, oh, that doesn't -- that's not
 15 something we talk about so we're not even going
 16 to worry about it. Our faith, as I mentioned
 17 previously, impacts every area of our life.
 18 Q. Okay.
 19 A. I would say if the members are openly gay,
 20 there are still other ways to serve and to care
 21 for one another regardless of that decision.
 22 Q. But being openly gay, of course, runs counter
 23 to your mission. Right?
 24 A. I -- I don't -- I don't agree with that
 25 statement.

1 A. I would say everyone's welcome to have a belief
 2 in God.
 3 Q. And in the scenario I'm going through, if all
 4 the members are openly gay, they are at least
 5 welcome to say, "Leadership, you're wrong"?
 6 A. Yes.
 7 Q. Okay. How can they take over your group? How
 8 can your group go from BLinC and its mission
 9 statement to "We're openly gay and we're just
 10 as religious as BLinC, but this is what we
 11 believe." I mean I asked you before, can I
 12 vote you out?
 13 A. Could you please say the question again?
 14 Q. Well, with the scenario of the membership, the
 15 only members are openly gay, the leadership
 16 isn't. It's following BLinC's mission
 17 statement, but now I want to fundamentally
 18 change the nature of the group. Okay? I want
 19 to be registered, but I want us to be part of
 20 BLinC because it's Business Leaders in Christ,
 21 so I want all that benefit out of Tippie
 22 College of Business. I want the ability to
 23 contact speakers from Rockwell Collins that
 24 would be more than willing to speak at the
 25 College of Business. How do I effectively take

1 over BLinC's leadership and say, "This is our
2 mission statement," or I just can't?
3 A. I don't know.
4 Q. Okay. Then when you indicate that everybody's
5 welcome, is it fair to say they're welcome if
6 they agree with your mission statement?
7 A. No.
8 Q. Can I be a Muslim and be in your group?
9 A. Yes.
10 Q. Can I be a leader?
11 A. No.
12 Q. Can I be Jewish and be in your group?
13 A. Yes.
14 Q. Can I be a leader?
15 A. If they believe our mission statement, perhaps.
16 As for the Muslim, I would say.
17 Q. And then let me ask you, do you think it's
18 appropriate for the University of Iowa to have
19 separate sports teams based on men and women?
20 A. Sure.
21 Q. Are you familiar with Title IX?
22 A. Yes.
23 Q. You understand that's a federal law to promote
24 women's athletics?
25 MR. BAXTER: Object to the extent it calls

1 for a legal conclusion.
2 Q. If you understand the purpose of Title IX.
3 Maybe you don't.
4 A. I don't want to answer that.
5 Q. Okay. But you do understand the University of
6 Iowa has separate teams based on sex.
7 A. Yes.
8 Q. Okay. So, for example, there's a women's
9 basketball team.
10 A. Yes.
11 Q. Okay. Were you a sports fan when you were at
12 Iowa?
13 A. I dabbled.
14 Q. Okay. You understand there's a men's
15 basketball team?
16 A. Yes.
17 Q. You don't see a problem with the University of
18 Iowa separating those teams by sex, do you?
19 A. I do not.
20 Q. Okay. And if we went down all the examples of
21 sports teams at Iowa, NCAA-sanctioned sports,
22 you wouldn't have a problem with men's
23 baseball, women's softball.
24 A. No.
25 Q. Now, do you fundamentally understand the

1 physical distinctions between men and women as
2 far as strength, speed?
3 A. Sure.
4 Q. Okay. Like if you follow any sports, men's
5 swimming times are so much faster than women's.
6 Correct?
7 A. Yes. Correct.
8 Q. If men were allowed to join women's teams at
9 the University of Iowa, wouldn't that undercut
10 the ability of women to participate?
11 A. Yes.
12 Q. Okay. Tremendously, wouldn't it?
13 A. Yes.
14 Q. Okay. Now, when we move on to -- There's a
15 distinction at Iowa. There are club sports.
16 A. Yes.
17 Q. So they're not NCAA sanctioned but they're --
18 they're in never-never land.
19 A. Yes.
20 Q. There are women's club sports and men's club
21 sports. Do you agree that they should be able
22 to segregate by sex?
23 A. Yes.
24 Q. Because the same principle would apply,
25 wouldn't it?

1 A. Yes.
2 Q. Then I'm going to show you Exhibit G. And I
3 understand your position. For now I just need
4 you to identify what it is.
5 A. This is a declaration of Eric Baxter.
6 Q. And have you read it before?
7 A. I've not.
8 Q. You were noticed out to discuss the declaration
9 of Mr. Baxter. Correct?
10 MR. BAXTER: I object. It calls for a
11 legal conclusion.
12 Q. Will you look back to Exhibit A and look at
13 Number 7.
14 A. Yes.
15 Q. Okay. Will you read that out loud, please.
16 A. Sure. "Knowledge of the Declaration of Eric
17 Baxter filed in Federal Court on June 4th,
18 2018."
19 Q. And with respect to Number 7, you did not
20 review the declaration of Mr. Baxter. Correct?
21 A. I did not.
22 Q. Okay. Is that based on your attorney's advice?
23 MR. BAXTER: Objection. Don't answer that
24 question.
25 Q. Okay. So as we sit here today, Ms. Thompson,

1 you're not prepared to discuss paragraph 7?

2 A. Correct.

3 MR. BAXTER: I'll just clarify for the
4 record we did not designate her as the
5 respondent for Number 7, and we've noted our
6 objection to counsel.

7 MR. CARROLL: That's fine. I need to make
8 foundation.

9 Q. And with respect to rather than what Mr. Baxter
10 said in his declaration, are you familiar with
11 the backup documents that are public records?
12 So when you get past his signature page, are
13 you familiar with these documents?

14 MR. BAXTER: When you say these documents,
15 are you referring to all of them --

16 MR. CARROLL: Yes.

17 MR. BAXTER: -- or are you referring to a
18 specific document?

19 MR. CARROLL: All of them.

20 MR. BAXTER: Take your time and look. I
21 would also just like to note for the record
22 that this is the declaration of Eric Baxter
23 dated December 11, 2017, and the declaration
24 noticed in the 30(b)(6) is the declaration
25 filed on June 4th, 2018.

1 MR. CARROLL: I do see that distinction so
2 I'll go with Exhibit G, and I'll only ask her
3 about the attachments, which were all public
4 records in the state of Iowa.

5 Q. And maybe I can move this along. Did you look
6 at any of those documents before today?

7 A. I've seen some of them before.

8 Q. Okay. When we look at -- If we go to right
9 after Mr. Baxter's signature on page 2,
10 correct? I mean do you see that?

11 A. Yes, I do.

12 Q. Then there's an Exhibit A.

13 A. Yes.

14 Q. And now the pages aren't -- well, they are
15 numbered at the top, so page 4 of 93. So we'll
16 go off that.

17 A. Sure.

18 Q. This is a University of Iowa document. Were
19 you familiar with the document at the time you
20 were involved in BLinC?

21 A. I believe I've seen it before.

22 Q. And you understand just by its heading,
23 "Registration of Student Organizations."

24 A. Yes.

25 Q. BLinC was a registered student organization.

1 A. Yes.

2 Q. So is it fair to conclude your group would have
3 been governed at least in part by this
4 document?

5 A. Sure.

6 Q. Okay. So if we look to the next page, page 5
7 of 93, do you see the paragraph towards the
8 top, paragraph 2 and it has a. and b.

9 A. Yes.

10 Q. Okay. And b. talks about membership, correct?

11 A. Correct.

12 Q. And that's talking about the membership in
13 registered student organizations.

14 A. Yes.

15 Q. Correct?

16 A. Yep.

17 Q. And that would be your members, along with all
18 other groups. Correct?

19 A. Yes.

20 Q. And there it says that you have the right to
21 choose members, but it also says, "in
22 accordance with the University of Iowa Policy
23 on Human Rights." Correct?

24 A. Yes.

25 Q. And I don't think -- It's right there in black

1 and white, is it not?

2 A. Yes.

3 Q. Is that telling you as a former member of BLinC
4 and a leader that you must follow the
5 University of Iowa Policy on Human Rights?

6 MR. BAXTER: Objection to the extent it
7 calls for legal question, but you can -- legal
8 conclusion. You can try to answer if you can.

9 A. Yes.

10 Q. And then the next paragraph, "Membership and
11 participation in the organization." See that?

12 A. Yes.

13 Q. In that sentence, does it delineate membership
14 and leadership?

15 MR. BAXTER: Again, I'm going to object to
16 the extent this is asking for a legal
17 conclusion, but if you can answer the question,
18 you can go ahead.

19 A. I'm not going to answer the question.

20 Q. Okay. Do you understand what the word
21 "membership" means?

22 A. I understand membership in the context of
23 Business Leaders in Christ membership.

24 Q. Membership means you're a member of a group,
25 correct?

1 A. Sure.
 2 Q. Okay. Participation, does that mean you
 3 participate in the group?
 4 A. Yes.
 5 Q. Do you participate as a leader?
 6 A. Yes.
 7 Q. And did you participate in BLinC as a leader?
 8 A. I did.
 9 Q. Are you also a member?
 10 A. Yes.
 11 Q. And then the sentence continues with all the
 12 protected classifications, correct?
 13 A. Correct.
 14 Q. So "Membership and participation in the
 15 organization must be open." You understand the
 16 word "must"?
 17 A. Yes.
 18 Q. Doesn't say "may be open," does it?
 19 A. No.
 20 Q. Okay. "Must be open to all students." Was
 21 Mr. Miller a student?
 22 A. Yes.
 23 Q. "Without regard to race, creed, color,
 24 religion," and in this case was he excluded
 25 from BLinC because he didn't believe in your

1 religion?
 2 A. Our fundamental beliefs were in conflict with
 3 one another.
 4 Q. And it continues on, without regard to sexual
 5 orientation. That would cover Mr. Miller,
 6 correct?
 7 A. Yes.
 8 Q. Gender identity. Do you know what that means
 9 within the University of Iowa context?
 10 A. If you would like to clarify, I --
 11 Q. Well, you understand -- Well, maybe you don't.
 12 You understand there's an LGBTQ organization on
 13 campus?
 14 A. Yes.
 15 Q. And there's even one within the business
 16 school.
 17 A. Yes.
 18 Q. Do you know what those -- Do you know what
 19 that group's purpose is?
 20 A. I do not.
 21 Q. Is it fair to say that this Exhibit A
 22 accurately captures the responsibility of a
 23 registered student organization for membership
 24 and accurately captures the human rights policy
 25 at the University of Iowa?

1 MR. BAXTER: Again, I'm going to object.
 2 Just ongoing objection to this line of question
 3 to the extent it calls for a legal conclusion.
 4 Q. You can answer.
 5 A. Would you restate the question?
 6 Q. Do you have any reason to believe that this
 7 wouldn't have applied -- despite the date of
 8 when it's filed, this wouldn't have applied to
 9 BLinC?
 10 A. No.
 11 Q. I mean you were the same as any other student
 12 organization on campus, correct?
 13 A. Correct.
 14 Q. Registered.
 15 A. Yes.
 16 Q. Now, in this case, BLinC could have existed on
 17 its own off campus without any interference
 18 from the University of Iowa. Correct?
 19 A. I would say the resources provided by the
 20 university helped us grow as an organization.
 21 Q. I understand that, but if you didn't take
 22 university funding, would you have to abide by
 23 any university policies?
 24 MR. BAXTER: Again, I'm going to object to
 25 the extent it calls for a legal conclusion.

1 MR. CARROLL: Okay.
 2 MR. BAXTER: You can answer if you can.
 3 A. I'm not going to answer.
 4 Q. Do you believe that you would have had the
 5 right despite being a registered organization
 6 to meet in your home or apartment and meet with
 7 people who had similar religious beliefs as
 8 you?
 9 A. Yes.
 10 Q. And do you believe you could do everything in
 11 the mission statement of BLinC within your
 12 apartment or house with others who believe the
 13 same as you?
 14 A. Yes. However, we chose to register as a
 15 student organization for reasons of being a
 16 part of the community, of benefiting the
 17 community. Credibility given to the
 18 organization.
 19 Q. Okay. And my question is, though, you could
 20 have done it absent -- whether you'd be as
 21 viable, there would be nothing that the
 22 University of Iowa or the State of Iowa could
 23 do to stop you from meeting in your private
 24 residence. Correct?
 25 A. That's correct.

1 Q. So BLinC voluntarily chose for whatever reason
2 to register and accept benefits from the
3 University of Iowa.
4 A. Yes.
5 Q. Is there any reason BLinC wasn't -- Other than
6 viability and financial, any reason BLinC
7 wasn't just a private organization?
8 A. We had the option to be a student group on
9 campus, so we wanted to take that opportunity
10 and the benefits that came along with that.
11 Q. And when you decided to pursue that
12 opportunity, did you speak with anybody what
13 I'll call in an advisor capacity or student
14 life to say, yes, you can have email; yes, you
15 can have conference rooms, things like that,
16 but you have to abide by our human rights
17 policy?
18 A. I don't believe we ever had a conversation
19 similar to that.
20 Q. Okay. Did you understand that when you took
21 any financial resources, not like free rent
22 space, if you took any money from the
23 University of Iowa, you had an absolute
24 obligation under state law to account for the
25 funding?

1 A. Yes.
2 Q. Okay. And so that money came with
3 restrictions, correct?
4 A. Yes.
5 Q. And, in fact, when you used the Union for your
6 recruitment fairs, in fact, that had
7 restrictions. Correct?
8 A. Yes.
9 Q. Like where you could put your table?
10 A. Yes.
11 Q. Okay. For example, you can't bring alcohol to
12 your recruitment fair at the Union, can you?
13 A. Correct.
14 Q. So it came with restrictions.
15 A. Yes.
16 Q. Okay. Just like other restrictions, you can
17 use State of Iowa funding, you can use State of
18 Iowa property, but you can't break our
19 restrictions. Is that fair?
20 A. That's fair.
21 Q. Okay. For example, you cannot smoke on campus,
22 can you?
23 A. Correct.
24 Q. I mean I know people do it.
25 A. Yeah.

1 Q. But it's against -- You can't be sitting in
2 the Union at a recruitment fair smoking a
3 cigarette.
4 A. Correct.
5 Q. Okay. And the university would have the
6 absolute right to say, "You can't do that and
7 you're now leaving."
8 A. Yes.
9 Q. And particularly with the alcohol example.
10 A. Sure.
11 Q. That really wouldn't set a good example for
12 undergrads at Iowa.
13 A. Correct.
14 Q. Right?
15 A. Correct.
16 Q. So there's a variety of restrictions that came
17 when you registered. Correct?
18 A. Yes. Okay.
19 Q. And one of the restrictions was the human
20 rights policy.
21 A. Okay.
22 Q. Is that a yes?
23 A. Yes.
24 Q. Okay. Then I'll give you Exhibit H.
25 THE WITNESS: Is it possible to take a

1 break, please?
2 MR. CARROLL: Of course.
3 (A brief recess was taken.)
4 Q. Okay, we're moving along pretty well,
5 Miss Thompson. I have a couple follow-ups when
6 I was -- I think during the break. I asked you
7 about you could presumably have a group off
8 campus in a residential facility. Isn't it
9 also true if you weren't -- even if you weren't
10 a registered organization, you could rent the
11 IMU for recruitment fairs and space?
12 A. I don't know.
13 Q. Okay. And then you also indicated that you
14 felt bullied during the interview with
15 Miss Cervantes?
16 A. Yes.
17 Q. And I know you put it in your declaration. Was
18 it the nature of the questions or the nature of
19 questioning?
20 A. I would say the nature of the questioning.
21 Q. Okay. And my understanding is that you've
22 never been in that setting before?
23 A. Correct.
24 Q. And you've never been in this setting before?
25 A. Correct.

1 Q. Okay. And you weren't here present to watch
 2 your attorney question the University of Iowa
 3 witnesses.
 4 A. I was not, no.
 5 Q. Then I gave you Exhibit H before the break.
 6 A. Yes.
 7 MR. CARROLL: And you have it? Did I give
 8 you H?
 9 MR. BAXTER: Yes, I do.
 10 MR. CARROLL: Okay.
 11 Q. Can you briefly tell me what Exhibit H is?
 12 A. Yes. This is the constitution of Business
 13 Leaders in Christ dated April 1st, 2014.
 14 Q. Was this the one in effect when the Marcus
 15 Miller matter --
 16 A. Yes.
 17 Q. -- arose?
 18 A. Yes.
 19 Q. Okay. And this one, it doesn't really have
 20 what I'll call a mission statement, does it?
 21 A. It has a purpose statement.
 22 Q. Okay. Right. But then the one we looked at
 23 earlier, the more recent constitution or
 24 bylaws, the statement of faith --
 25 A. Yes.

1 Q. -- that was much more detailed; correct?
 2 A. Yes.
 3 Q. Do you have any understanding why the more
 4 detailed one came about?
 5 A. Yes. I think as time went on, we -- we
 6 developed our ideas and how to more
 7 specifically state the mission of the
 8 organization.
 9 Q. And at the time of the -- do you understand
 10 that there was a revision to your bylaws or
 11 constitution during the -- after the
 12 Miss Cervantes findings --
 13 A. Yes.
 14 Q. -- and meeting with Mr. Nelson and others?
 15 A. Yes.
 16 Q. And were you involved in creating that
 17 document?
 18 A. I was not.
 19 Q. Then I'll show you what's marked as Exhibit I.
 20 Are you familiar with Exhibit I?
 21 A. Yes.
 22 Q. And what is Exhibit I?
 23 A. Attorney-client privilege redacted.
 24 Q. I'm sorry. Moving down --
 25 A. Oh.

1 Q. -- it's an email chain involving you and
 2 Mr. Miller, correct?
 3 A. Yes. How is this different from Exhibit E? It
 4 includes both? Is that right?
 5 Q. I'm sorry?
 6 MR. BAXTER: She's referring to the fact
 7 this is the same email that was previously
 8 introduced as Exhibit C and I think Exhibit
 9 maybe E.
 10 MR. CARROLL: Okay.
 11 Q. Sometimes the emails aren't full chains, so I
 12 just wanted to make sure of that, but you
 13 recognize this is an email from you?
 14 A. Yes.
 15 Q. And then I'll show you -- Okay, I want to show
 16 you Exhibit K. That may also already be in one
 17 of the earlier packets.
 18 A. Okay.
 19 Q. But I want to look at it just separately.
 20 A. Okay.
 21 MR. CARROLL: Did I give you your K?
 22 MR. BAXTER: No.
 23 MR. CARROLL: Okay. Here's K.
 24 Q. Did you create this chronology?
 25 A. Yes.

1 Q. Okay. And did you create it at or about the
 2 time of the Cervantes investigation?
 3 A. Yes.
 4 Q. What was the purpose of creating it?
 5 A. To document the timeline of my interactions
 6 with Marcus.
 7 Q. Okay. And was that a complete chronology or
 8 more of a summary, I need to get something
 9 done?
 10 A. Could you clarify?
 11 Q. Well, yes. Sometimes chronologies are
 12 extremely detailed.
 13 A. Sure.
 14 Q. And it's everything that possibly happened.
 15 What's your recollection? Is this everything
 16 or just more of a summary of what's important?
 17 A. I would say these are all of our interactions.
 18 The detail is more of a summary.
 19 Q. Okay. And I'll show you what's -- This is
 20 Exhibit M. I think this is in the record in a
 21 packet, but I just want to separate it out.
 22 A. Okay.
 23 Q. What is Exhibit M?
 24 A. Exhibit M is the notice of complaint from the
 25 Office of Equal Opportunity at the university,

1 EOD.
 2 Q. And is that the first time that you became
 3 aware of the complaint?
 4 A. Yes.
 5 Q. If I understand the record correctly, in April
 6 of 2017 you were still president of BLinC;
 7 correct?
 8 A. Yes.
 9 Q. And then at some point Jacob Estell became
 10 president?
 11 A. Yes.
 12 Q. Do you know how he became president?
 13 A. Yes.
 14 Q. How is that?
 15 A. He expressed interest in the position, as he
 16 had been an officer that year, had been a
 17 member, and had been involved in the
 18 organization. Expressed interest and we voted
 19 on that position at a meeting.
 20 Q. All right.
 21 A. Having notified our members ahead of time.
 22 Q. And so who voted?
 23 A. The members who were present at the meeting.
 24 Q. So at this point members got to vote on the
 25 leader?

1 A. Yes.
 2 Q. Had that occurred before?
 3 A. Yes.
 4 Q. So when Mr. Miller was excluded, he was
 5 excluded without a membership vote. Is that
 6 correct?
 7 A. For clarification, there had been a
 8 conversation prior to that meeting with Jacob
 9 as he expressed interest in the position.
 10 Q. A conversation about what?
 11 A. About his desire to be president of the
 12 organization.
 13 Q. All right.
 14 A. And --
 15 Q. Go ahead.
 16 A. Additionally, there had been a conversation
 17 before he became the vice president as well.
 18 That was standard to have those conversations.
 19 It wasn't just exclusively with Marcus.
 20 Q. But what I'm unclear on right now is when Jacob
 21 became president, all members in good standing,
 22 including leadership, could vote?
 23 A. Yes.
 24 Q. So had that all members got a vote on leaders
 25 happened before Mr. Estell's election?

1 A. Yes.
 2 Q. And how many times?
 3 A. Probably three times.
 4 Q. And I'm still unclear. Why wasn't Mr. Miller
 5 at least put on the ballot to let the members
 6 say, "We're okay with this," because if I
 7 understand the record correctly, that didn't
 8 happen with Mr. Miller.
 9 A. Um-hmm.
 10 Q. Is that fair?
 11 A. That's correct.
 12 Q. Why didn't it happen with Mr. Miller but it
 13 happened with Mr. Estell?
 14 MR. BAXTER: Objection to the extent
 15 you're mischaracterizing the record.
 16 A. I'm not going to answer that.
 17 Q. Well, was Mr. Estell elected by the membership?
 18 A. Yes.
 19 Q. And was Mr. Estell allowed to vote for himself?
 20 A. I don't remember if he chose to abstain or
 21 chose to vote.
 22 Q. Were other leaders -- Let's just take him out
 23 of the category since he's running for office.
 24 A. Sure.
 25 Q. Were other leaders allowed to vote?

1 A. Yes.
 2 Q. Okay. Now, that's how it happened with
 3 Mr. Estell. Whether he abstained or not,
 4 everybody else in good standing voted.
 5 A. Yes.
 6 Q. Okay. And was it your practice to have a
 7 simple majority vote?
 8 A. Yes. I believe our constitution says
 9 three-quarters or --
 10 Q. Okay. If it's in the constitution, that's
 11 fine.
 12 A. Yeah.
 13 Q. Then back to Mr. Miller, a vote did not occur
 14 by members in good standing. Is that correct?
 15 A. That's correct.
 16 Q. Okay. What is the distinction between
 17 Mr. Estell's election and Mr. Miller's
 18 potential election?
 19 A. Sure. In previous situations when someone
 20 would express interest in a position, as I
 21 mentioned earlier, there was often a meeting to
 22 sit down and explain the position, to talk
 23 through where they're at in their faith walk,
 24 and that was typical of I believe everyone who
 25 was elected as a leader.

1 Q. Okay.
 2 A. So similar to like a -- when you apply for a
 3 job, a phone call screening before you come in
 4 for an interview.
 5 Q. So Mr. Estell passed the screen.
 6 A. Sure, yes.
 7 Q. I mean isn't that, in essence, what you just
 8 said?
 9 A. Yes. He agreed with the mission statement, was
 10 on board with what we were doing, agreed with
 11 our interpretation of the Bible.
 12 Q. And Mr. Miller did not pass the screen because
 13 of his beliefs.
 14 A. Because of his beliefs.
 15 Q. Okay. Then I'll show you Exhibit P. Let me
 16 make sure -- excuse me. Will you look at P,
 17 please.
 18 A. Yes.
 19 Q. What is Exhibit P?
 20 A. Exhibit P is a letter we wrote to
 21 Dean Redington regarding the complaint.
 22 Q. Okay. And on that letter, who was the author?
 23 A. Jacob Estell.
 24 Q. Okay. And at the time Mr. Estell wrote the
 25 letter, he was the president?

1 A. Yes.
 2 MR. CARROLL: And I marked that exhibit so
 3 I can erase it or I can leave it there. It
 4 doesn't matter.
 5 MR. BAXTER: It's fine with me.
 6 THE WITNESS: It's okay.
 7 MR. CARROLL: Okay.
 8 Q. So at this point in time he was the president,
 9 correct?
 10 A. Yes.
 11 Q. I think you just said "we" drafted a letter to
 12 Dr. Redington. The "we" means you?
 13 A. That was a mistake.
 14 Q. Right. You had moved by now, hadn't you?
 15 A. Correct.
 16 Q. Okay. That's all I'm asking. Then if you look
 17 at the one, two, third paragraph, "Second, your
 18 office has previously agreed." Do you see
 19 that?
 20 A. Yes.
 21 Q. And that sentence, "Second, your office has
 22 previously agreed that it would be a violation
 23 of the Human Rights Act to force a student
 24 group to accept leaders whose behavior is
 25 contrary to the group's purpose or its

1 statement of faith." Did you help write that
 2 letter?
 3 A. I did not.
 4 Q. Okay. Do you believe that a student's behavior
 5 can be separated from status?
 6 A. Yes.
 7 Q. And back to Mr. Miller's situation in the sense
 8 that he said he was openly gay, could he ever
 9 overcome BLinC's statement of beliefs?
 10 A. Yes.
 11 Q. Would he have to change his lifestyle?
 12 A. Yes.
 13 Q. And would he have to also -- I don't know the
 14 level of your religiousness --
 15 A. Okay.
 16 Q. -- for lack of a better word. I mean would he
 17 have to, like, confess his sins for being gay?
 18 A. Yes.
 19 Q. And would he do it to the group?
 20 A. To a trusted individual in the group, I would
 21 say, would be appropriate.
 22 Q. But he certainly would have to change his
 23 lifestyle. Correct?
 24 A. Yes. I would say our faith hinges on sin and
 25 recognizing sin in your life in order to

1 receive the grace and mercy offered to us
 2 through Jesus.
 3 Q. And so your organization's in part sin is being
 4 openly gay.
 5 A. It's one sin.
 6 Q. It is one of them.
 7 A. Yes.
 8 Q. But it is, correct?
 9 A. Correct.
 10 Q. In your group's views.
 11 A. In our understanding and traditional church
 12 history.
 13 Q. And so Mr. Miller, just to circle back to this,
 14 he can be a member and openly sinful?
 15 A. Yes.
 16 Q. But he can't be a leader.
 17 A. Correct.
 18 Q. Okay. And as a member, I can be openly sinful
 19 without confessing or seeking forgiveness.
 20 A. Yes. We desired it to be a welcoming place.
 21 We want to grow together, yes. Yeah.
 22 Q. And so while you'll welcome Mr. Miller as a
 23 member, he's not welcome to be a leader.
 24 A. Correct.
 25 Q. Let me look real quick.

1 Miss Thompson, other than being here
 2 present, are you actively involved, not with
 3 your attorneys, but with members of BLinC in
 4 resolving this problem?
 5 MR. BAXTER: I'm going to object for lack
 6 of -- Can you say that again?
 7 MR. CARROLL: Well, if she's talking to
 8 Mr. Estell without your involvement, I want to
 9 know.
 10 A. Yes, we're friends.
 11 Q. Okay. So do you generally know the status of
 12 the litigation?
 13 A. Generally.
 14 Q. Okay. And have you contacted or been contacted
 15 by the media in this case?
 16 A. Yes.
 17 Q. Okay. And what media groups?
 18 A. Local media, I believe *The Daily Iowan* is the
 19 only group I've been contacted by personally.
 20 Q. Did you ever talk to the *Gazette*?
 21 A. Nope.
 22 Q. Have you been involved in -- You understand
 23 while they're attorneys, Mr. Baxter,
 24 Mr. Blomberg, they work for an organization,
 25 the Becket group?

1 A. Yes.
 2 Q. Do you understand what that group is?
 3 A. Yes.
 4 Q. Have you been involved in their media releases
 5 related to this litigation?
 6 A. Could you be more specific?
 7 Q. Yes.
 8 A. Did I contribute?
 9 Q. Well, are you aware that the Becket group has
 10 routinely issued media statements regarding
 11 this litigation?
 12 A. Yes.
 13 Q. Were you involved in any of that, what it
 14 should contain?
 15 A. No.
 16 Q. So from your point of view, is BLinC's strategy
 17 to wage war with the University of Iowa in the
 18 media?
 19 A. No.
 20 Q. What's the purpose of media releases?
 21 MR. BAXTER: Objection to the extent it
 22 calls for speculation, but you can answer if
 23 you know.
 24 A. I would say BLinC's desire to talk about this
 25 issue is in regards to discrimination they have

1 faced from the university on the basis of
 2 gathering as a religious organization and not
 3 being able to pick leaders for the group.
 4 Q. Are you aware of any University of Iowa
 5 statements released to the media --
 6 A. I'm not.
 7 Q. And let me finish -- with respect to this
 8 litigation?
 9 A. I'm not.
 10 Q. Are you aware of the University of Iowa ever
 11 stating that BLinC -- to the media, BLinC
 12 openly discriminated against a gay man?
 13 A. I'm not aware of that.
 14 MR. CARROLL: Okay. Thank you. I have no
 15 further questions.
 16 MR. BAXTER: I have a couple of follow-up
 17 questions I'd like to ask.
 18 CROSS-EXAMINATION
 19 BY MR. BAXTER:
 20 Q. Hannah, Mr. Carroll asked you some questions
 21 about someone who is openly gay. What's your
 22 understanding of what it means to be openly
 23 gay?
 24 A. My understanding of someone who is openly gay
 25 is someone who's choosing to engage in a

1 relationship with someone else of the same
 2 gender or desires to pursue a relationship with
 3 someone of the same gender or act on those
 4 desires, is my understanding.
 5 Q. And if a student publicly acknowledged that he
 6 was gay or had same-sex attraction but agreed
 7 that that was sinful and agreed to live by
 8 BLinC's statement of faith, would that student
 9 be eligible to serve as a leader of BLinC?
 10 A. Yes.
 11 Q. And has anybody ever trained you on the meaning
 12 of the human rights policy at the University of
 13 Iowa?
 14 A. No.
 15 Q. Do you have any legal understanding of what it
 16 means?
 17 A. I do not.
 18 Q. And Mr. Carroll asked you if the University of
 19 Iowa separates its teams, NCAA teams, on the
 20 basis of sex, and you acknowledged that it
 21 does. Correct?
 22 A. Yes.
 23 Q. So you understand -- Is it correct if a woman
 24 applied out for the men's NCAA football team at
 25 the University of Iowa, would they be permitted

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1 to play on the team, as far as you know?

2 A. Could you restate that?

3 Q. Yeah. If a woman tried out to play on the

4 men's football team at the University of Iowa,

5 do you know if she would be allowed to play on

6 the team?

7 A. I don't know.

8 Q. Okay. If a woman was not allowed on the --

9 well, not allowed to play on the men's football

10 team, would you think it's fair to characterize

11 that as a form of sex discrimination?

12 A. No.

13 Q. Okay. And why not?

14 A. I would say given that there were two separate

15 teams designated for each individual, they

16 might have the ability to try out, but also

17 they're at risk of being rejected.

18 Q. And was it your understanding of the human

19 rights policy that different religious groups

20 were allowed to exist on campus without

21 violating the human rights policy?

22 A. Yes.

23 Q. And are you aware of other religious groups

24 that exist on campus?

25 A. Yes.

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1 Q. Okay. You mentioned you had a conversation

2 with Jake before his selection as being a

3 leader.

4 A. Yes.

5 Q. What was the purpose of that? What was the

6 purpose of that conversation?

7 A. To talk about the position, to hear about where

8 he was at in his faith walk, to talk about the

9 beliefs and the mission and the purpose of

10 BLinC, and to ensure that we were on the same

11 page as to protect the organization.

12 Q. And was it your standard of practice to have

13 conversations like that with anyone who wanted

14 to hold a leadership position?

15 A. Yes.

16 MR. BAXTER: Okay. I have no further

17 questions.

18 MR. CARROLL: Just a second. Take a real

19 quick break.

20 (A brief recess was taken.)

21 MR. CARROLL: We're all done.

22 (Deposition concluded at 10:31 a.m.)

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CERTIFICATE

1 I, the undersigned, a Certified Shorthand

2 Reporter of the State of Iowa, do hereby

3 certify that there came before me at the date,

4 time and place hereinbefore indicated, the

5 witness named on the caption sheet hereof, who

6 was by me duly sworn to testify to the truth of

7 said witness's knowledge touching and

8 concerning the matters in controversy in this

9 cause; that the witness was thereupon examined

10 under oath, the examination taken down by me in

11 shorthand, and later reduced to computer-aided

12 transcription under my supervision and

13 direction, and that the deposition is a true

14 record of the testimony given and of all

15 objections interposed.

16 I further certify that I am neither

17 attorney or counsel for, nor related to or

18 employed by any of the parties to the action in

19 which this deposition is taken, and further that

20 I am not a relative or employee of any attorney

21 or counsel employed by the parties hereto, or

22 financially interested in the action.

23 Review of the transcript was not requested

24 by the witness or any party.

25 Dated at Cedar Rapids, Iowa, this 18th day

of August, 2018.

Julie M. Kluber
Certified Shorthand Reporter

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
EASTERN DIVISION

BUSINESS LEADERS IN
CHRIST, an
unincorporated
association,

Plaintiff,

vs.

THE UNIVERSITY OF
IOWA; LYN REDINGTON,
in her official
capacity as Dean of
Students and in her
individual capacity;
THOMAS R. BAKER, in
his official capacity
as Assistant Dean of
Students and in his
individual capacity;
and WILLIAM R. NELSON,
in his official
capacity as Executive
Director, Iowa
Memorial Union, and in
his individual
capacity,

Defendants.

CASE NO. 3:17-CV-00080

Deposition of

JACOB ESTELL

Deposition of JACOB ESTELL, taken before
Julie M. Kluber, Certified Shorthand Reporter,
commencing at 8:07 a.m., September 20, 2018, at
2500 Crosspark Road, Room W219, Coralville,
Iowa.

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JACOB ESTELL

9-20-18

4

6

1 JACOB ESTELL,
 2 called as a witness, having been first duly
 3 sworn, testified as follows:
 4 DIRECT EXAMINATION
 5 BY MR. CARROLL:
 6 Q. Would you state your full name for the record,
 7 please.
 8 A. Jacob Estell.
 9 Q. Mr. Estell, my name is George Carroll. I'm
 10 with the Iowa Attorney General's Office. I
 11 represent the University of Iowa in the BLinC
 12 litigation. I'm sure your lawyer has talked to
 13 you -- I'm not going to ask you about what
 14 your lawyer told you, but have you ever been
 15 deposed before?
 16 A. No, I haven't.
 17 Q. All right. So just a couple ground rules and
 18 most are for her. Let me finish my question
 19 before your answer, even if you know exactly
 20 what I'm asking you, because she cannot take
 21 down two people at the same time.
 22 A. Um-hmm.
 23 Q. Then the second rule is when I ask a yes-or-no
 24 type of question, you need to say yes or no,
 25 not a nod or an uh-huh. I know it's human

5

1 nature, but again, she needs to take down this
 2 record accurately. And then finally, if you
 3 don't understand my question, just ask me to
 4 rephrase it or repeat it so that we're both
 5 talking about the same thing today. Is that
 6 fair?
 7 A. Yes.
 8 Q. All right, thank you. Are you currently
 9 employed?
 10 A. Yes.
 11 Q. Where are you employed?
 12 A. The Iowa City VA Hospital.
 13 Q. Okay. And what is your job title?
 14 A. I'm a receiving clerk, so it's just a supply
 15 chain management for a store that they have
 16 there.
 17 Q. Okay.
 18 A. So I receive all the packages and everything.
 19 Q. And the Iowa City VA, so you literally are
 20 working in the VA that I know in Iowa City?
 21 A. Yes, sir.
 22 Q. Okay. And do you work for any other VA
 23 systems?
 24 A. Technically I don't work for the VA. It's for
 25 Veterans Canteen Services, which is a sub of

1 the VA, so it's like another department in the
 2 VA.
 3 Q. And your employer, is it a private employer or
 4 is it part of the VA?
 5 A. It's part of the VA, like, umbrella. It's
 6 really confusing.
 7 Q. Yes.
 8 A. It's part of, like, the VA as a whole but it's
 9 a sub department. They're a self-sustaining
 10 department, so --
 11 Q. Okay. Let me ask you this: Do you consider
 12 yourself a federal government employee?
 13 A. Yes.
 14 Q. Okay. And so you're subject to federal
 15 government guidelines?
 16 A. Yes.
 17 Q. Employment practices?
 18 A. Yes.
 19 Q. And when did you graduate from the University
 20 of Iowa?
 21 A. May 2018.
 22 Q. And what was your role with -- and I'll just
 23 call it BLinC, which you recognize, of course.
 24 A. Yes.
 25 Q. What was your role in BLinC when you were a

7

1 student at Iowa?
 2 A. I had two roles: I was a vice president and
 3 then the president, so that role was conducting
 4 a meeting in a small room and -- yeah.
 5 Q. When did you first join BLinC?
 6 A. 2015, I believe.
 7 Q. And so just so I have the context, what year in
 8 college were you?
 9 A. I was a -- That would have been sophomore.
 10 It's really confusing. I joined the military
 11 in the middle of my schooling, so I took a
 12 semester off, so it was my sophomore year, I
 13 guess, but --
 14 Q. Okay.
 15 A. Yeah.
 16 Q. So did you join BLinC as a member originally?
 17 A. Yes.
 18 Q. And then at some point you became vice
 19 president?
 20 A. Yes.
 21 Q. And then you became president.
 22 A. Yes.
 23 Q. When were you president of BLinC?
 24 A. From fall of 2017 till spring of 2018.
 25 Q. Were you elected to be president by the group?

1 A. Yes.
 2 Q. And how many members did you have?
 3 A. About seven or eight.
 4 Q. Okay. And so did you have competition to be
 5 president?
 6 A. Yes.
 7 Q. Okay. So how is that vote held? Is it
 8 private, confidential so people -- you don't
 9 know if somebody voted for the other person?
 10 A. Oh, yeah. Yeah, it's just simple, like someone
 11 writes down on a piece of paper who they want
 12 to vote for and folds it over and puts it in a
 13 hat.
 14 Q. Okay.
 15 A. The people who are being voted on or for leave
 16 the room and then come back.
 17 Q. And is it a simple majority rule?
 18 A. Yes.
 19 Q. Okay. So you were essentially -- Were you
 20 elected to be vice president or appointed?
 21 A. I was elected to be vice president and then
 22 elected to be president.
 23 Q. Okay. So some organizations -- Just by
 24 background, some organizations if you're vice
 25 president you're automatically moving into the

1 next step or chair, but in this case, you still
 2 had to run to be president?
 3 A. Yes.
 4 Q. Okay. And all members of BLinC in good
 5 standing have the ability to vote?
 6 A. Yes.
 7 Q. Do you know Marcus Miller?
 8 A. Yes.
 9 Q. When did you first meet Marcus Miller?
 10 A. 2014. Fall of 2014.
 11 Q. Okay. And what year in college were you?
 12 A. Sophomore. Yeah.
 13 Q. And what year was Mr. Miller, if you know?
 14 A. Freshman, I believe. I don't know.
 15 Q. Are you aware of the fact that he hasn't
 16 graduated from Iowa yet?
 17 A. No.
 18 Q. So how did you come about to meet Mr. Miller?
 19 A. He was attending the same BLinC meeting as me.
 20 Q. And obviously he's a -- Well, maybe you don't
 21 know it but I know it. He's a College of
 22 Business major. Did you know him from classes?
 23 A. No.
 24 Q. So the only way you would have ever met
 25 Mr. Miller was through BLinC. Is that fair?

1 A. Yes.
 2 Q. So when you first met Mr. Miller, it was just
 3 him attending BLinC meetings?
 4 A. Yes.
 5 Q. Was there any requirements for Mr. Miller to
 6 assert his belief in your faith statement?
 7 A. As a member?
 8 Q. Yes.
 9 A. No.
 10 MR. BAXTER: Object for lack of
 11 foundation, but go ahead.
 12 Q. When I say faith statement, if you view it as
 13 your mission statement of BLinC, obviously I
 14 read your bylaws and your constitution, but was
 15 there any requirement that Mr. Miller as a
 16 member had to somehow affirm the faith
 17 statement or mission statement of BLinC?
 18 A. No. Anybody could come and be a member.
 19 Anybody can come to meetings.
 20 Q. Okay. And could those members express their
 21 opinions about their faith and/or BLinC's faith
 22 statement?
 23 A. Yes.
 24 Q. Did Mr. Miller, as a member, ever express his
 25 disagreement with BLinC's position on same-sex

1 relationships?
 2 A. No.
 3 Q. Did there come a point in time when you became
 4 aware that he did have a disagreement with the
 5 faith statement of BLinC?
 6 A. Only after a complaint was filed and we were
 7 flagged for investigation.
 8 Q. Okay. So prior to that, Mr. Miller had never
 9 expressed his disagreement -- potential
 10 disagreement with BLinC's faith statement?
 11 A. No.
 12 Q. Then were you involved in the process where he
 13 wanted to become an officer within BLinC?
 14 A. No.
 15 Q. Other than, and we'll get to it, the university
 16 investigation, did you have any fact knowledge
 17 that he applied to be vice president of BLinC?
 18 A. No.
 19 Q. When was the first time you understood or
 20 became aware that Mr. Miller had sought to
 21 become an officer within BLinC and was turned
 22 down?
 23 A. I don't know. The only time I can think of is
 24 after the investigation started.
 25 Q. And so if we break that out -- and if you don't

1 remember, that's fine. If we break it out to
 2 obviously Mr. Miller sought to be an officer.
 3 That didn't occur, and is it your testimony you
 4 weren't aware of that event as it's happening?
 5 A. Correct.
 6 Q. Okay. Then so your first awareness was when
 7 the university essentially started to
 8 investigate BLinC?
 9 A. Yes.
 10 Q. Okay. At that time that the university
 11 investigated BLinC, were you the president of
 12 BLinC?
 13 A. No.
 14 Q. So you were vice president?
 15 A. Yes.
 16 Q. What was your role in the investigation, if
 17 any?
 18 A. Could you explain or rephrase a little bit
 19 more?
 20 Q. Sure. The university provides a formal notice
 21 to organizations. Were you aware that BLinC
 22 received one?
 23 A. Yes.
 24 Q. So once that happened, did you see that actual
 25 notice?

1 A. Yes.
 2 Q. So it's a rather formal letter, correct?
 3 A. Yes.
 4 Q. So you're aware of it, and I believe the time
 5 will show that you were vice president at the
 6 time. You understand that this is an
 7 investigation the university's going to
 8 conduct, okay. Then did you have any role at
 9 that stage, the very initial stage this piece
 10 of paper shows up at BLinC, and what, if any,
 11 role did you have at that initial stage?
 12 A. I don't know. Support Hannah as the president
 13 and try and get more information about what
 14 happened.
 15 Q. Okay.
 16 A. I wasn't aware of the situation even happening,
 17 so --
 18 Q. Okay. So as vice president, you weren't aware
 19 that Mr. Miller, one, wanted to be an officer,
 20 and two, was turned down?
 21 A. Correct. I was not aware.
 22 Q. So the first time you became aware of this
 23 potential issue was essentially the written
 24 complaint. Or the notice from the University
 25 of Iowa.

1 A. Yes.
 2 Q. Okay. What, if any, efforts did you make to
 3 discover what really happened?
 4 A. Talked to Hannah. We had a meeting with the
 5 group or the executive team. Just talked about
 6 it, but --
 7 Q. And when you say executive team, what does that
 8 mean to me?
 9 A. Elected officials, so president, vice
 10 president, secretary. Yeah. At the time,
 11 yeah.
 12 Q. So are there three?
 13 A. Yes. At that point in time there were.
 14 Q. Did that grow or decrease?
 15 A. Now it is four -- four positions or four
 16 people, yes.
 17 Q. Okay. And you've graduated from the University
 18 of Iowa, correct?
 19 A. Yes.
 20 Q. Are you still a member of BLinC?
 21 A. No.
 22 Q. Do you provide any support to BLinC?
 23 A. No.
 24 Q. Any people call you and ask you, hey, can you
 25 help us find a speaker, anything like that?

1 A. No. I hope so someday, but no.
 2 Q. Yeah. As we speak today.
 3 A. No. That has not happened.
 4 Q. And when you talked with Hannah about the
 5 University of Iowa's notice of complaint, what
 6 did Hannah tell you?
 7 A. Hannah told me that Marcus had applied for a
 8 position, and they talked and Marcus told her
 9 that he was homosexual and that he didn't agree
 10 with what the Bible had said about that and
 11 just wanted to live that way, and I think at
 12 that point Hannah decided that our beliefs
 13 weren't aligned with each other and that he
 14 wasn't able to be on leadership from there.
 15 Q. But he could be a member?
 16 A. Yes.
 17 Q. And he could be a voting member?
 18 A. Yes.
 19 Q. Okay. When did you first become involved in
 20 responding to the university's complaint?
 21 A. As soon as I got -- As soon as we got the
 22 complaint.
 23 Q. So you met with Hannah, you asked her what
 24 happened, and she explained it to you.
 25 Correct?

1 A. Yes.
 2 Q. At that point in time were you aware of the
 3 University of Iowa's human rights policy?
 4 A. Yes.
 5 Q. What was your understanding of the University
 6 of Iowa's policy with respect to sexual
 7 orientation?
 8 A. Nobody -- nobody should be discriminated
 9 upon -- against on the basis of their sexual
 10 orientation.
 11 Q. Okay. And you understand -- You were a
 12 College of Business major, correct?
 13 A. No.
 14 Q. I'm sorry. I thought you were. What was your
 15 major?
 16 A. Enterprise leadership.
 17 Q. And what college does that come through?
 18 A. Liberal Arts and Sciences.
 19 Q. Okay. So CLAS, as I know it?
 20 A. Yes. Yes, sir.
 21 Q. So were you aware that the university's policy
 22 on human rights applied to all university
 23 functions? Hiring, termination, enrollment?
 24 A. Yes.
 25 Q. All of those things?

1 A. Yes.
 2 Q. Okay. Were you also aware that, in fact, it
 3 could potentially violate university policy if
 4 you personally discriminated against somebody
 5 because of their color of their skin?
 6 MR. BAXTER: Objection to the extent it
 7 calls for a legal conclusion.
 8 You can go ahead and try to answer if you
 9 can.
 10 A. Could you restate the question?
 11 Q. Yes. Were you aware that if you discriminated
 12 against a fellow student in some manner because
 13 of the color of skin, you may be in violation
 14 of university policy?
 15 A. Yes.
 16 Q. And same with gender?
 17 A. Yes.
 18 Q. Same with disability?
 19 MR. BAXTER: I'm just going to extend an
 20 ongoing objection to these questions to the
 21 extent they call for a legal conclusion.
 22 MR. CARROLL: Okay.
 23 A. Yes.
 24 Q. And sexual orientation?
 25 A. Yeah. Yes.

1 Q. You understood as a University of Iowa student
 2 you had certain obligations to treat people
 3 fairly and equally?
 4 A. Yes. I believe I did.
 5 Q. I'm not saying you didn't. I want to know what
 6 your understanding of the rules were. Okay, so
 7 you talked with Hannah. Hannah basically said
 8 to you because Mr. Miller said he was gay and
 9 didn't -- really couldn't affirm or confirm
 10 BLinC's mission statement or faith statement,
 11 he wasn't eligible to be a leader?
 12 MR. BAXTER: Objection to the extent it
 13 mischaracterizes the record, but you can go
 14 ahead and answer.
 15 A. Could you repeat that real quick, please?
 16 Q. Yes. I believe you testified that you asked
 17 Hannah, "Well, what's this about?" And she
 18 said to you, "Mr. Miller said 'I'm gay and I
 19 don't really believe in certain parts of your
 20 faith statement.'" Is that what Hannah told
 21 you?
 22 A. Yes.
 23 Q. And so, therefore, he was disqualified to be a
 24 leader within BLinC.
 25 A. Yes.

1 Q. And just so the record's clear, you weren't
 2 part of that decision-making, were you?
 3 A. No.
 4 Q. So Hannah, on her own, determined -- You were
 5 vice president at the time, weren't you?
 6 A. No.
 7 Q. Were you --
 8 A. I was a member.
 9 Q. Okay. So do you know who else was involved in
 10 the decision-making involving Mr. Miller?
 11 A. No.
 12 Q. Did you talk to anybody other than Hannah about
 13 Mr. Miller?
 14 A. No.
 15 Q. Okay. Then were you involved in providing the
 16 response to the University of Iowa's complaint?
 17 A. Yes.
 18 Q. What was your involvement?
 19 A. Brainstorming our response.
 20 Q. And did BLinC provide a written response to the
 21 University of Iowa?
 22 A. Yes.
 23 Q. Did you in any manner author it?
 24 MR. BAXTER: Objection for lack of
 25 foundation.

1 A. I don't -- I don't recall. I don't take
2 authorship in them. I don't remember that.
3 Q. All right. Let me break it down. You can get
4 a response. You could proof it for grammatical
5 errors.
6 MR. BAXTER: Do you have a specific
7 response in mind or are you just asking
8 generally?
9 MR. CARROLL: The one that, in fact, BLinC
10 provided to the University of Iowa.
11 MR. BAXTER: Is that something you can
12 show him? I'm not sure what you're talking
13 about when you say the response that BLinC
14 provided to the University of Iowa.
15 MR. CARROLL: I think the witness
16 testified that he was involved. I want to know
17 his level of involvement.
18 Q. The authorship to me means you wrote a
19 paragraph. Or did you just edit it?
20 A. I don't know what document you're speaking
21 about.
22 Q. Okay.
23 A. Could you --
24 Q. Did you see a document that BLinC provided to
25 the University of Iowa?

1 A. Yes.
2 Q. Okay. Did you edit that document?
3 A. I don't know.
4 Q. If you don't remember, that's fine. I mean
5 you've written college papers, correct?
6 A. Yes.
7 Q. All right. And so you know what authorship
8 means. You're responsible to write it
9 yourself, are you not?
10 A. Yes.
11 Q. You can have people edit it, but they're not
12 supposed to add substance to it. Correct?
13 A. Yes.
14 Q. As a student.
15 A. Yes.
16 Q. So my question to you is the response that
17 BLinC provided to the University of Iowa, did
18 you in any manner author that, if you recall?
19 MR. BAXTER: Objection for lack of
20 foundation, but you can go ahead and try to
21 answer.
22 A. I don't know.
23 Q. Okay. Now, you understood at some point
24 BLinC's position was because of Mr. Miller's
25 sexual orientation and beliefs, he would not be

1 eligible to be a leader of BLinC. Is that
2 fair?
3 A. No.
4 Q. Okay. So if you can, what is the reason
5 Mr. Miller was not selected to be a leader?
6 A. He didn't believe the same thing about the
7 Bible that we did.
8 Q. Okay. And isn't that tied into his status as a
9 gay man?
10 A. If you will, yes, but it is on the basis of his
11 belief in acting upon those -- those beliefs.
12 Q. So could an openly gay person, male or female,
13 ever be a leader of BLinC?
14 A. Yes.
15 Q. And how would that square with your belief
16 system?
17 A. If you -- If said person was a gay person and
18 affirmed with us that he or she did not want to
19 live that lifestyle but still had feelings of
20 being a homosexual, we would still allow them
21 to be a leader.
22 Q. Okay. So if I'm openly gay and I'm going to
23 pursue that lifestyle, a same-sex relationship,
24 I'm understanding your testimony correctly,
25 they wouldn't be eligible to be a leader.

1 A. Correct.
2 Q. Okay. So Mr. Miller and many others on the
3 University of Iowa campus would not be eligible
4 to be leaders within BLinC if they express
5 their sexual orientation and their belief that
6 they were going to continue that lifestyle. Is
7 that fair?
8 A. Yes.
9 Q. Okay. In the University of Iowa investigation,
10 did you read the human rights policy?
11 A. Yes.
12 Q. And it clearly states you cannot discriminate
13 based on sexual orientation, correct?
14 A. Yes.
15 Q. How do you square BLinC's position in this
16 case -- and I'm not asking for a legal
17 conclusion factually. How do you square
18 BLinC's position in this case factually with
19 the University of Iowa's human rights policy on
20 sexual orientation?
21 A. What do you mean, square, or -- how --
22 Q. How could I possibly be openly gay, affirm that
23 I'm going to pursue that lifestyle, and the
24 University of Iowa policy protects my ability
25 to do that within classes, scholarships, things

1 like that but BLinC says to Mr. Miller, well,
2 because you disagree with us, you're not
3 eligible to be a leader?

4 MR. BAXTER: Objection to the extent it
5 assumes a legal conclusion.

6 You can go ahead and answer.

7 A. We have freedom of religion.

8 Q. Okay.

9 A. And a right to our faith and make decisions
10 based on that.

11 Q. And do you have the right to take state funds?

12 A. As my own person or --

13 Q. No, no, BLinC.

14 A. To take state funds. Do you mean like funding
15 from the university?

16 Q. Yes. Let me back up. You understand you could
17 use the union facilities free of charge,
18 correct?

19 A. Yes.

20 Q. As a registered group.

21 A. Yes.

22 Q. Do you understand that the union otherwise
23 charges groups to use its facilities?

24 A. What do you mean when you say union?

25 Q. The Iowa Memorial Union.

1 A. Yes.

2 Q. The building.

3 A. Yes.

4 Q. Okay. You participate in the recruitment
5 fairs?

6 A. Yes.

7 Q. You use the University of Iowa mass website
8 email access?

9 A. Yes.

10 Q. You understand the Memorial Union is a
11 state-funded facility?

12 A. Yes.

13 Q. You understand the website and mass email
14 access is a state-funded access system?

15 A. Yes.

16 Q. You have a personal email account, I assume.

17 A. Yes.

18 Q. Okay. You have one with the VA?

19 A. Yes.

20 Q. The VA account is for business purposes only?

21 A. Yes.

22 Q. You understand the VA's paying for that?

23 A. No. But yes.

24 Q. The VA's not paying for your business account?

25 A. I mean I don't know. I wasn't sure.

1 Q. If you don't know, that's fine.

2 A. Yeah.

3 Q. So in what manner, if any, was BLinC required
4 to apply for state funds or state support in
5 order to exist?

6 A. I'm not sure. When you say required, does that
7 mean we had to apply for funding?

8 Q. Yes.

9 A. We didn't have to.

10 Q. Could BLinC exist without being a registered
11 student organization?

12 A. No.

13 Q. And why not?

14 A. Because we access and use their facilities as a
15 meeting place, and we recruit students at
16 student org fairs to -- to grow.

17 Q. Were you in the College of Business building
18 very often?

19 A. Yes.

20 Q. So did BLinC ever inquire about the ability to
21 use bulletin boards? And by that I mean
22 old-fashioned bulletin boards.

23 A. Yes.

24 Q. So is it your testimony without that access to
25 state resources, BLinC couldn't exist?

1 A. Correct.

2 Q. And at the time you were president, you had
3 seven or eight members?

4 A. Yes.

5 Q. How many undergraduate students are at the
6 University of Iowa?

7 A. I don't know. Twenty-five thousand.

8 Q. Twenty-five thousand?

9 A. Maybe.

10 Q. And do you know how many undergraduate students
11 there are in the College of Business?

12 A. No.

13 Q. Are you aware that it's one of the larger
14 undergraduate schools, obviously below CLAS.

15 A. Yes.

16 Q. So is it your testimony without access to state
17 funding, BLinC couldn't exist as an
18 organization?

19 A. Yes.

20 Q. What, if anything, prevented BLinC from meeting
21 on campus, for example, in a College of
22 Business conference room?

23 A. If the meeting room was available at the time
24 that we wanted.

25 Q. Okay. And could BLinC have meetings in a

1 private residence without state funding?
 2 A. Sure, yeah.
 3 Q. And did you ever have meetings in private
 4 residences -- Without telling me where anybody
 5 lived, did you ever have meetings in private
 6 residences?
 7 A. No.
 8 Q. They were always on campus?
 9 A. Yes.
 10 Q. And they were always either -- Well, let me
 11 ask you this: Were they generally always in
 12 the College of Business building?
 13 A. Yes.
 14 Q. And was there a conference room that you had
 15 ready access to on a continuing basis, or did
 16 you have to move around that building?
 17 A. Generally, we had the same room.
 18 Q. Okay. Which room was that? It's confusing, so
 19 if you don't know, that's fine.
 20 A. S104. It changed from year to year.
 21 Q. Okay. And those were university-provided
 22 conference rooms, correct?
 23 A. Yes, they're within the school of business.
 24 Q. And, in fact, did you reserve the room?
 25 A. Yes.

1 Q. Like this room we're in today is reserved.
 2 Nobody can come in here and tell us to move
 3 today. So BLinC actually reserved a room so
 4 students couldn't walk in randomly and study.
 5 Is that fair?
 6 A. Yeah.
 7 Q. And that was provided by the University of Iowa
 8 to BLinC.
 9 A. Yes.
 10 Q. Okay. So a student that wanted to randomly get
 11 into a quiet space could not use the space that
 12 you have reserved through the University of
 13 Iowa?
 14 A. Yes.
 15 Q. Okay. And do you think you have the ability to
 16 tell the student or students, not within BLinC,
 17 the one that just wants to sit quietly and
 18 study, you can't be in here right now?
 19 A. We have the ability to, but I would invite them
 20 to join the meeting.
 21 Q. Well, no, I'm talking about I want to walk in
 22 here and study. I don't want to be in your
 23 meeting. You're in a room that I want to use.
 24 Did you have the ability to tell them, sorry,
 25 this is reserved?

1 A. Yes. Yeah.
 2 Q. Okay. Then did you have a faculty advisor for
 3 BLinC?
 4 A. Yes.
 5 Q. And who was that?
 6 A. Susan Sager.
 7 Q. Did you know her before you were part of BLinC?
 8 A. No.
 9 Q. So the only way -- She's a professor at Iowa,
 10 correct?
 11 A. No.
 12 Q. She's not?
 13 A. No.
 14 Q. Okay. When I say faculty, that's what I mean
 15 by faculty. What was her job, if you know?
 16 A. She worked for the Office of the President.
 17 Q. Okay. Do you know if she was a faculty member
 18 or just administrator?
 19 A. I don't know.
 20 Q. Okay. And you only knew of Miss Sager because
 21 of BLinC, correct?
 22 A. Yes.
 23 Q. Did you ever attend social functions with
 24 Miss Sager?
 25 A. What do you mean by a social --

1 Q. A gathering at her home.
 2 A. Yes.
 3 Q. How many times?
 4 A. Let me rephrase that. I did not but BLinC as a
 5 group did. I had drill that weekend, but yes.
 6 One time.
 7 Q. Okay. So I'm directing my questions just to
 8 you.
 9 A. Okay.
 10 Q. So while you may have learned of this event,
 11 you were not present. Is that fair?
 12 A. Yes.
 13 Q. Okay. And was Miss Sager the faculty
 14 advisor -- That's because it's a term we use,
 15 "we" meaning Iowa. Was she the faculty advisor
 16 throughout the time you were involved in BLinC?
 17 A. No.
 18 Q. And at some point it changed?
 19 A. Yes.
 20 Q. And who took over that position, if anybody, of
 21 advisor?
 22 A. At what time?
 23 Q. Well, we have Miss Sager for sure. Was there
 24 more than one after her?
 25 A. No.

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1 Q. Okay. So who became that person?
 2 A. Nobody.
 3 Q. Okay. So you had Miss Sager as the advisor,
 4 and then do you know why she no longer was the
 5 advisor?
 6 A. She took a different position with a company in
 7 Cedar Rapids.
 8 Q. Okay. So she left the University of Iowa.
 9 A. Yes.
 10 Q. And then BLinC, moving forward, didn't have an
 11 advisor?
 12 A. Correct.
 13 Q. What was Miss Sager's role as advisor, if you
 14 know?
 15 A. To encourage us in different verses, Bible
 16 verses. She sometimes led meetings, so she was
 17 the -- she would come in and speak. Yeah.
 18 Q. If you know, do you know how Miss Sager became
 19 involved to be advisor of BLinC?
 20 A. No.
 21 Q. And I believe the record indicates over the
 22 course of time BLinC has had outside speakers?
 23 A. Yes.
 24 Q. Do you recall what companies they worked for?
 25 A. Yes.

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1 Q. And what companies do you recall the speakers
 2 being employed by?
 3 A. Launch Services and, for example -- and
 4 Rockwell Collins.
 5 Q. Did you know who the speakers were before they
 6 were speakers?
 7 A. Yes, some of them.
 8 Q. I mean you knew of them?
 9 A. Yes.
 10 Q. Somehow. Okay. And would they share their
 11 commitment to BLinC's faith statements? I'm
 12 sorry, let me back up. Why were they giving
 13 speeches? I mean were they there simply to
 14 talk about this is the real world of business
 15 or whatever you're going to go do next after
 16 graduation, or was it more this is how you can
 17 continue your faith moving on in life?
 18 A. It was a mix of both of those examples.
 19 Q. Okay. And were you aware of any of the
 20 employers that they worked for, whether they
 21 had nondiscrimination policies?
 22 A. I was not aware, but I assume, yes.
 23 Q. The VA has a nondiscrimination policy, correct?
 24 A. Yes.
 25 Q. And, in fact, it's against VA rules, federal

1 law, to discriminate against people based on
 2 sexual orientation?
 3 MR. BAXTER: Objection to the extent it
 4 calls for a legal conclusion.
 5 Q. Have you read the VA nondiscrimination policy?
 6 A. I don't know. I don't know.
 7 Q. When you were first hired, did you have to go
 8 to mandatory training?
 9 A. Yes.
 10 Q. You just don't recall if you looked at that
 11 policy?
 12 A. Correct.
 13 Q. Did any of the speakers that were presenting to
 14 BLinC reference anything related to their
 15 employer's position on discrimination and their
 16 faith?
 17 A. No.
 18 Q. And I believe the record indicates at some
 19 point you met with University of Iowa
 20 individuals to talk about the Marcus Miller
 21 complaint?
 22 A. Yes.
 23 Q. And who did you meet with from Iowa?
 24 A. I met with Tom Baker and Bill Nelson.
 25 Q. And who was present with you in the sense of --

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1 You've identified those. Who else was in the
 2 room?
 3 A. Yeah. Eric and Daniel, my attorneys, and Brett
 4 Eikenberry, the vice president at the time.
 5 Q. And without getting into what you talked to
 6 your counsel, at this stage you -- did BLinC
 7 retain counsel?
 8 A. What do you mean?
 9 Q. Retain generally means I'm going to give you
 10 some money. Please represent me.
 11 MR. BAXTER: I'm going to object to this
 12 question and instruct him not to answer.
 13 MR. CARROLL: These are foundational
 14 questions. I'm not asking about privilege.
 15 I'm asking how they got to your organization,
 16 and I think that's fair.
 17 MR. BAXTER: Can you restate the question?
 18 MR. CARROLL: Yes.
 19 Q. How did you get to the attorneys that are
 20 present in this room?
 21 A. They contacted my president at the time,
 22 Hannah.
 23 Q. Okay. And Hannah told you that?
 24 A. Yes.
 25 Q. Okay. So when you met with University of Iowa

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1 individuals, there were two individuals from
 2 the University of Iowa in the room --
 3 A. Yes.
 4 Q. -- that you identified? Yourself. Who else
 5 was in the room from BLinC?
 6 A. Brett.
 7 Q. Brett, okay, and then your two lawyers.
 8 A. Yes.
 9 Q. Correct? Were there any lawyers from the
 10 University of Iowa present in the room, to your
 11 knowledge?
 12 A. I don't know.
 13 Q. Okay. Well, you've listed two people that are
 14 not lawyers for the University of Iowa. Was
 15 there anybody else in the room from the
 16 University of Iowa?
 17 A. I don't believe so, no.
 18 Q. What was the point of the meeting?
 19 A. To talk about the plan that -- or how we
 20 would -- I guess the decision that was made
 21 about BLinC. Yeah, and what, if any, plan
 22 going forward and plan of action taken going
 23 forward and how we can still be a student
 24 organization.
 25 Q. By that, that means registered student

1 organization.
 2 A. Yes.
 3 Q. Correct? You could always be an organization.
 4 Correct?
 5 A. Yes.
 6 Q. I mean you could exist privately, meet at
 7 somebody's residence, and still have everything
 8 except university funding and resources. Is
 9 that fair?
 10 A. Yes.
 11 Q. Okay. So during the meeting, at the end of the
 12 meeting, what did you believe was the next step
 13 for BLinC?
 14 A. That we could submit an acceptable plan of
 15 action going forward to not violate the human
 16 rights policy and add in a clause to our -- our
 17 constitution that stated our statement of faith
 18 and -- yeah. So others who were joining the
 19 organization could know beforehand what they
 20 were getting into and they wouldn't get
 21 offended by that.
 22 Q. Okay. And was it your understanding if you
 23 amended your statement of faith that would be
 24 sufficient for the University of Iowa?
 25 A. Yes.

1 Q. Were you given words to use? Sample language?
 2 A. No.
 3 Q. I mean so let me ask you factually, how would
 4 you know what to write?
 5 A. I don't know.
 6 Q. Was that amended statement presented to the
 7 University of Iowa?
 8 A. Yes.
 9 Q. Who wrote it?
 10 A. I did, along with Brett and Liz, the secretary
 11 at the time.
 12 Q. Liz is the secretary of BLinC?
 13 A. Yes.
 14 Q. Is that --
 15 A. At the time, yes.
 16 Q. All right. And then did you submit it to the
 17 University of Iowa?
 18 A. Yes.
 19 Q. And what was Iowa's response?
 20 A. It didn't fulfill their expectation or their
 21 requirement.
 22 Q. And did they point out how it didn't fulfill
 23 that expectation? "They" being Iowa.
 24 A. Right. Yes.
 25 Q. What did Iowa tell you? And by "you," I mean

1 BLinC.
 2 A. Right. That we -- that that wasn't good enough
 3 for them. That it still violated human rights
 4 policy. It was somewhat of a surprise.
 5 Q. Did BLinC attempt to submit a second statement
 6 to satisfy the university's requirements?
 7 A. I can't remember. I don't know.
 8 Q. Then are you familiar with -- and I apologize,
 9 I don't have copies -- this document
 10 declaration of yourself?
 11 A. Yes.
 12 Q. Okay. And I'll show it to you. Paragraph
 13 Number 9 -- Let me ask you, did you write
 14 this?
 15 A. Yes.
 16 Q. And that's your signature, correct --
 17 A. Yes.
 18 Q. -- on page 7? So in paragraph 9, "I
 19 further" -- you state, "I further knew that the
 20 complaint was false." What made you write
 21 that? What was false about the complaint?
 22 A. The complaint was false because he didn't
 23 believe what we believed.
 24 Q. Okay. Did you see his complaint?
 25 A. No.

1 Q. So how can you assert it's false, what he
2 wrote?
3 A. Because we were given a notification of
4 investigation.
5 Q. Okay. So the falsity is not that he
6 complained, it's what he complained about?
7 A. Yes.
8 Q. You understand students -- in fact, anybody on
9 the university campus has the right to file
10 complaints --
11 A. Yes.
12 Q. -- if they feel like a rule or policy's been
13 violated.
14 A. Yes.
15 Q. So just so I understand what you -- we don't
16 generally call them declarations, but did you
17 understand you were submitting that under oath?
18 A. Yes.
19 Q. Okay. So under oath, you indicated that
20 Mr. Miller filed a false complaint?
21 A. The content of his complaint was false, yes.
22 Q. Okay. And the content itself is --
23 Mr. Miller's complaint, I believe, said, "I was
24 denied a leadership position because I'm openly
25 gay."

1 MR. BAXTER: Objection for lack of
2 foundation.
3 Q. Do you understand that to be his complaint?
4 A. No, but --
5 Q. Well, if you don't, that's fine. What did you
6 understand his complaint to be?
7 A. Yes, I do understand that, but the falsity in
8 that is not he was denied because he's gay, not
9 on the basis of his status but what he believed
10 to live out that lifestyle and that action.
11 Q. Okay. So is it fair to say based on what
12 Mr. Miller had told apparently Hannah, he would
13 never be eligible to be a leader of BLinC?
14 A. No.
15 Q. All right. Well, didn't he indicate to Hannah
16 that "I'm openly gay and I don't completely
17 agree with your faith statement, but I still
18 want to be a leader"?
19 A. Yes, that's true.
20 Q. So the distinction apparently you're drawing is
21 you can be openly gay. I mean do you have to
22 repent from being openly gay to be a leader, or
23 do you have to say, "I'm not going to live that
24 lifestyle"?
25 A. Affirm that you won't live that lifestyle.

1 Q. Well, your faith statement does not endorse
2 same-sex relationships, does it?
3 A. Correct.
4 Q. Okay. So how can I be openly gay and be a
5 leader of BLinC?
6 A. Let everyone know that you don't want to live
7 that way or live that lifestyle.
8 Q. Okay.
9 A. Or act upon those feelings that you have.
10 Q. But what it means is -- Is it fair for me to
11 characterize your testimony that I have to
12 change my ways to be a leader of BLinC?
13 A. Yes.
14 Q. So -- Go ahead, if you weren't finished.
15 A. No, that's fine, go ahead.
16 Q. Okay. So with respect to Mr. Miller, once he
17 said, "I'm openly gay, this is the lifestyle
18 I'm going to choose, he really could not be a
19 leader of BLinC. Is that fair?
20 A. No.
21 Q. Okay. Why isn't it fair?
22 A. Because he could be gay and say, "I don't want
23 to live that way. I don't want to live out
24 that lifestyle," and we would allow him to be.
25 Q. Okay. But so my question is I'm not going to

1 change my lifestyle. Could Mr. Miller ever be
2 a leader of BLinC?
3 A. If he wasn't willing to change, no.
4 Q. Okay. And do you have -- When Mr. Miller was
5 a member, were you aware that he was gay?
6 A. No.
7 Q. Were you aware of it until this issue came up?
8 A. No.
9 Q. What other rules of membership do you have? I
10 mean can I be disabled and be a member of
11 BLinC?
12 A. Yes.
13 Q. Can I be a veteran?
14 A. Yes.
15 Q. Can I be a woman?
16 A. Yes.
17 Q. Can I be African-American?
18 A. Yes.
19 Q. But I can't be openly gay.
20 A. You sure can be, yes.
21 Q. Okay. But I can't be a leader. I can be a
22 member but not a leader.
23 A. Yes.
24 Q. How come I can be a member and be openly gay
25 and live that lifestyle and you're not kicking

1 me out?

2 A. Because there's a higher sense of

3 responsibility for leaders in any organization

4 to act a certain way, live a certain way, and

5 we just have a different set of beliefs that we

6 aspire to live by.

7 Q. Okay. And so, for example, could Mr. Miller

8 stand up at a BLinC meeting and say, "I'm

9 openly gay. I choose this lifestyle. I

10 disagree with your faith statement," as a

11 member?

12 A. Yes.

13 Q. Okay. So you had seven or eight members when

14 you were in leadership?

15 A. Yes.

16 Q. So let's just say three or four are leaders.

17 Correct?

18 A. Yes.

19 Q. Okay. I mean I know -- I understand it changed

20 at some point. So of the seven or eight

21 members, are the others just -- you're a leader

22 and a member. Correct?

23 A. If you will, yes.

24 Q. Well, when you're giving me seven or eight, are

25 you including leadership?

1 A. Yes.

2 Q. Okay. So if you had the entire membership

3 openly gay and disagreed with your faith

4 statement, they're all welcome --

5 A. Yes.

6 Q. -- to your group. And would they all be

7 eligible to vote on the new leadership?

8 A. Yes.

9 Q. So if a majority of the members of your group

10 are openly gay, could they vote in an openly

11 gay leader?

12 A. No.

13 Q. Why not?

14 A. Because of what the Bible says.

15 Q. Okay. So it's a democratic vote except because

16 of their beliefs they don't get a vote?

17 A. You -- They get to vote, but --

18 Q. Well, okay. If the majority of the voters are

19 openly gay and live that lifestyle, and they

20 vote in an openly gay member that lives that

21 lifestyle as a leader, why can't they be the

22 leader?

23 MR. BAXTER: Object for lack of foundation

24 and mischaracterizing the facts.

25 A. It's purely a hypothetical. That did not

1 happen.

2 Q. Well, you were voted in; correct?

3 A. Yes.

4 Q. Could somebody have voted against you because

5 of your beliefs?

6 A. Yes.

7 Q. Could somebody vote for Mr. Miller because of

8 his beliefs?

9 A. Yes.

10 Q. Okay. You were voted in as vice president?

11 A. Yes.

12 Q. What position did Mr. Miller apply to be?

13 A. I don't know.

14 Q. Do you know if the position he applied to be

15 was one that should have been voted upon?

16 A. Yes.

17 Q. It should have been, correct?

18 A. Yes.

19 Q. Was it?

20 A. No.

21 Q. Why not?

22 A. Didn't get to a vote.

23 Q. If you know, why didn't it get to a vote?

24 A. Because Hannah and Marcus talked about this

25 beforehand, before, so it was like this

1 interview process, if you will.

2 Q. And you're getting your version of facts from

3 Hannah?

4 A. Yes.

5 Q. Did you talk to Mr. Miller about what occurred?

6 A. No.

7 Q. Okay. Was he still a member at the time of the

8 complaint, if you know?

9 A. No.

10 Q. I'm sorry, my question wasn't good. So he

11 wasn't a member any longer.

12 A. No.

13 Q. Okay. And you never, ever -- Well, let me ask

14 you, have you ever spoken to Mr. Miller about

15 his version of what occurred?

16 A. No.

17 Q. So all you know of what occurred is through

18 Hannah?

19 A. Yes.

20 Q. And to your knowledge, was anybody with Hannah

21 when she talked to Mr. Miller?

22 A. I don't know.

23 Q. I mean if you don't know, that's fine.

24 A. I'm not sure.

25 Q. Okay. Then after the university said to BLinC,

1 hey, this isn't meeting what we've asked for,
 2 what, if any, steps did you take, because now
 3 you're president, aren't you?
 4 A. No.
 5 Q. You're vice president?
 6 A. No.
 7 Q. When you met with Iowa, what was your role?
 8 A. President.
 9 Q. I'm sorry, that's the timeframe.
 10 A. Okay.
 11 Q. After Iowa said this isn't what we need, what,
 12 if any, role did you have to either clean it up
 13 one more time, engage with Iowa, or move on?
 14 A. Rule, make a decision on what we should do.
 15 Q. Okay. Who was involved in the decision-making?
 16 A. Brett, myself, and Liz.
 17 Q. And the decision -- And without your counsel's
 18 advice because I'm not going to go down that
 19 path, internally the decision by BLinC was no,
 20 we're not going to do anything more?
 21 A. No.
 22 Q. So did you come back with a second draft to
 23 Iowa?
 24 A. I -- I can't remember. I'd have to -- I think,
 25 yes, I believe so, but I can't remember.

1 Q. You understood at some point BLinC was
 2 deregistered, correct?
 3 A. Yes.
 4 Q. And that was based on the initial Marcus Miller
 5 complaint and then discussions with the
 6 University of Iowa?
 7 A. Yes.
 8 Q. And then you're deregistered. From BLinC's
 9 point of view, were there any further attempts
 10 to say what more can we do about our
 11 constitution or our faith statement?
 12 A. Could you restate the question?
 13 Q. Yes. Once the University of Iowa said, well,
 14 we think you're in violation of the policy --
 15 they did tell you that at some point, didn't
 16 they?
 17 A. Yes.
 18 Q. You had submitted like an amended proposal, and
 19 Iowa said that's not enough. Did BLinC ever
 20 submit another proposal before BLinC was
 21 deregistered?
 22 A. I believe so, yes.
 23 Q. And was that also similarly rejected?
 24 A. Yes.
 25 Q. Okay. When you met with the University of Iowa

1 officials at that meeting, with Tom Baker and
 2 Bill Nelson, what, if any, assurances were you
 3 given by either Mr. Baker or Mr. Nelson about
 4 moving forward on picking leaders versus
 5 members?
 6 A. I believe Tom Baker made an example of an
 7 environmentalist group who would be able to
 8 choose their own leadership who affirm with
 9 global warming, and in the similar sense, we
 10 can choose our own leaders on the basis of our
 11 beliefs and just like every other organization
 12 does. They also said there's a lot -- as
 13 they're leaving, they mentioned that there's a
 14 lot of great leaders in -- at the university
 15 but some of the best are in the room, like
 16 pointing at Brett and I.
 17 Q. Okay. And do you know, was that Mr. Baker who
 18 said it?
 19 A. I don't know.
 20 Q. Okay. Then was there anything else said
 21 after -- With the assumption there was a
 22 second submittal to the University of Iowa, was
 23 there a third submittal to the University of
 24 Iowa from BLinC?
 25 A. I don't know.

1 Q. And, I'm sorry, I don't recall. When did you
 2 graduate from Iowa?
 3 A. May 2018.
 4 Q. So just last spring.
 5 A. Um-hmm.
 6 Q. Yes?
 7 A. Yes.
 8 Q. When was your last involvement, other than
 9 today or again, I'm not going to ask you about
 10 your lawyers. When was your last involvement
 11 in this issue with BLinC?
 12 A. A hearing in January of 2018.
 13 Q. And so when you graduate, you're not a member
 14 of BLinC; correct?
 15 A. Correct.
 16 Q. Does BLinC have this rule that you can be a
 17 nonstudent and still be involved as a member,
 18 or do you have to be a student at the
 19 University of Iowa?
 20 A. You have to be an undergrad or a graduate
 21 student, yes.
 22 Q. Okay. So the moment you graduated, all your
 23 eligibility expired.
 24 A. Yes.
 25 MR. CARROLL: Okay. All right. I want to

JACOB ESTELL

9-20-18

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1 take a quick break and we'll finish up.
 2 (A brief recess was taken.)
 3 MR. CARROLL: I have no more questions.
 4 MR. BAXTER: Okay. I just have a couple
 5 of questions.
 6 CROSS-EXAMINATION
 7 BY MR. BAXTER:
 8 Q. Jake, you talked about the election of leaders.
 9 Is there a screening process before members can
 10 run for office?
 11 A. Yes.
 12 Q. And what's involved in that screening process?
 13 A. So we will talk about -- we talk about the
 14 belief about the Bible, pray with them, and
 15 then present a statement of faith and that
 16 they'll sign that just affirming what they
 17 believe.
 18 Q. Okay. And if someone refuses to sign that
 19 statement of faith, are they allowed to go to
 20 the election?
 21 A. No.
 22 Q. Okay. So is it correct that -- And does that
 23 apply to all individuals who run for offices?
 24 A. Yes.
 25 Q. Okay. So is it correct to say that if someone

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1 rejected BLinC's beliefs about homosexuality
 2 that they wouldn't pass the screening
 3 interview?
 4 A. Correct.
 5 Q. And then it's correct that -- Is it correct
 6 that they wouldn't be able to run for an
 7 office?
 8 A. That's correct.
 9 MR. BAXTER: Okay. No further questions.
 10 MR. CARROLL: All right. Thank you.
 11 We're done.
 12 (Deposition concluded at 9:07 a.m.)
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CERTIFICATE

1 I, the undersigned, a Certified Shorthand
 2 Reporter of the State of Iowa, do hereby
 3 certify that there came before me at the date,
 4 time and place hereinbefore indicated, the
 5 witness named on the caption sheet hereof, who
 6 was by me duly sworn to testify to the truth of
 7 said witness's knowledge touching and
 8 concerning the matters in controversy in this
 9 cause; that the witness was thereupon examined
 10 under oath, the examination taken down by me in
 11 shorthand, and later reduced to computer-aided
 12 transcription under my supervision and
 13 direction, and that the deposition is a true
 14 record of the testimony given and of all
 15 objections interposed.

16 I further certify that I am neither
 17 attorney or counsel for, nor related to or
 18 employed by any of the parties to the action in
 19 which this deposition is taken, and further that
 20 I am not a relative or employee of any attorney
 21 or counsel employed by the parties hereto, or
 22 financially interested in the action.

23 Review of the transcript was not requested
 24 by the witness or any party.

25 Dated at Cedar Rapids, Iowa, this 27th day
 of September, 2018.

Julie M. Kluber
 Certified Shorthand Reporter

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<p>40:19, 54:6, 54:7 undergrad [1] - 51:20 undergraduate [3] - 27:5, 27:10, 27:14 undersigned [1] - 54:2 understood [4] - 11:19, 18:1, 21:23, 49:1 unincorporated [1] - 1:4 union [3] - 24:17, 24:22, 24:24 Union [3] - 1:15, 24:25, 25:10 UNITED [1] - 1:1 university [13] - 11:15, 12:7, 12:10, 12:20, 16:22, 17:3, 17:14, 24:15, 28:21, 37:8, 40:9, 47:25, 50:14 UNIVERSITY [1] - 1:8 University [39] - 2:9, 4:11, 6:19, 13:24, 14:17, 15:5, 16:3, 16:5, 18:1, 19:16, 19:21, 20:10, 20:14, 20:25, 21:17, 23:3, 23:9, 23:19, 23:24, 25:7, 27:6, 29:7, 29:12, 32:8, 34:19, 35:25, 36:2, 36:10, 36:14, 36:16, 37:24, 38:7, 38:17, 49:6, 49:13, 49:25, 50:22, 50:23, 51:19 university's [4] - 13:7, 15:20, 16:21, 39:6 university-provided [1] - 28:21 up [7] - 13:10, 24:16, 33:12, 43:7, 44:8, 48:12, 52:1</p>	<p>11:17, 12:14, 13:5, 13:18, 14:9, 19:5, 35:4, 46:10, 48:5 view [2] - 10:12, 49:9 violate [2] - 17:3, 37:15 violated [2] - 39:3, 40:13 violation [2] - 17:13, 49:14 vote [12] - 8:7, 8:12, 9:5, 45:7, 45:10, 45:15, 45:16, 45:17, 45:20, 46:7, 46:22, 46:23 voted [6] - 8:9, 8:15, 46:2, 46:4, 46:10, 46:15 voters [1] - 45:18 voting [1] - 15:17 vs [1] - 1:7</p>
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<p>W219 [1] - 1:21 walk [2] - 29:4, 29:21 Walnut [1] - 2:7 wants [1] - 29:17 warming [1] - 50:9 Washington [1] - 2:4 ways [1] - 42:12 website [2] - 25:7, 25:13 weekend [1] - 31:5 welcome [1] - 45:4 whole [1] - 6:8 WILLIAM [1] - 1:13 willing [1] - 43:3 witness [5] - 4:2, 20:15, 54:4, 54:6, 54:14 witness's [1] - 54:5 woman [1] - 43:15 words [1] - 38:1 world [1] - 33:14 write [4] - 21:8, 38:4, 39:13, 39:20 writes [1] - 8:11 written [3] - 13:23, 19:20, 21:5 wrote [3] - 20:18, 38:9, 40:2</p>	
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<p>VA [15] - 5:12, 5:19, 5:20, 5:22, 5:24, 6:1, 6:2, 6:4, 6:5, 6:8, 25:18, 25:20, 33:23, 33:25, 34:5 VA's [2] - 25:22, 25:24 verses [2] - 32:15, 32:16 version [2] - 47:2, 47:15 versus [1] - 50:4 veteran [1] - 43:13 Veterans [1] - 5:25 vice [14] - 7:2, 7:18, 8:20, 8:21, 8:24,</p>	
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<p>year [6] - 7:7, 7:12, 9:11, 9:13, 28:20 yes-or-no [1] - 4:23 yourself [4] - 6:12, 21:9, 36:4, 39:10</p>	

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
EASTERN DIVISION**

BUSINESS LEADERS IN CHRIST,

Plaintiff,

v.

THE UNIVERSITY OF IOWA, *et al.*

Defendants.

Civ. Action No. 3:17-cv-00080-SMR-SBJ

**DECLARATION
OF ERIC BAXTER**

I, Eric Baxter, declare as follows:

1. I am Senior Counsel at the Becket Fund for Religious Liberty. I represent Business Leaders in Christ (BLinC), a student group at the University of Iowa, in the above-captioned matter.

2. On December 11, 2017, I accessed the website of the Dean of Students of the University of Iowa. On that site, I accessed the University's policy with regard to the Registration of Student Organizations. A true and accurate version of that policy is attached as **Exhibit A**. I also accessed the Statement of Religious Diversity. A true and accurate version of that Policy is attached as **Exhibit B**.

3. On December 11, 2017, I accessed the Operations Manual at the website of the University of Iowa. Chapter 3 of that manual contains the University's Human Rights Policy. A true and accurate version of that Policy is attached as **Exhibit C**.

4. On December 11, 2017, I accessed the Center for Student Involvement & Leadership's OrgSync website, www.uiowa.orgsync.com, went to the pages of the following student clubs, and downloaded a copy of their constitutions. A true and accurate copy of the constitution of the Feminist Union is attached as **Exhibit D**. The constitution of the Korean American Student

Association is attached as **Exhibit E**. The constitution of Students for Life is attached as **Exhibit F**. The constitution of the Association of Women Dentists is attached as **Exhibit G**. The constitution of Imam Mahadi is attached as **Exhibit H**. The constitution of the Christian Legal Society is attached as **Exhibit I**. The constitution of Love Works is attached as **Exhibit J**. The constitution of Cru is attached as **Exhibit K**. The constitution of Campus Bible Fellowship is attached as **Exhibit L**.

5. On December 11, 2017, I accessed The Daily Iowan website, <http://daily-iowan.com/2017/03/02/finding-a-home-in-faith/>, to obtain a copy the news article by Naomi Hofferber, Finding a Home in Faith (The Daily Iowan, Mar. 2, 2017). A true and accurate version of the article is attached as **Exhibit M**.

6. On December 11, 2017, I accessed BLinC's OrgSync page, <https://orgsync.com/93906/chapter>. A true and accurate version of the page is attached as **Exhibit N**.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this 11th day of December, 2017.

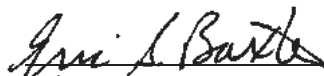

Eric S. Baxter

EXHIBIT A

DEAN OF STUDENTS

[Home](#) ▶ [Policies](#) ▶ Registration of Student Organi...

Registration of Student Organizations

A student organization is a voluntary special interest group organized for educational, social, recreational, and service purposes and comprised of its members. Student organizations are separate legal entities from the University of Iowa and legally are not treated the same as University departments or units. Student organizations can exist whether or not the University endorses them pursuant to this policy. Unless otherwise denoted hereafter, the use of the term “student organization” shall include sports clubs registered by Recreational Services.

Student organizations are an important link in the co-curricular activities of the University of Iowa. They play an important role in developing student leadership and providing a quality campus environment. As such, the University encourages the formation of student organizations around the areas of interests of its students, within the limits necessary to accommodate academic needs and ensure public safety.

I. Registration of Student Organizations

The University of Iowa, through the Vice President for Student Life (hereinafter, “vice president”), has delegated the responsibilities and obligations of registering student organizations to the Student Organization Review Committee (i.e., on behalf of the Center for Student Involvement & Leadership and Recreational Services) (SORC) and to deans of academic colleges. The SORC is a team of students and staff that determines the approval or denial of the application for registration. Registration of a student organization by the University does not constitute an endorsement of its program or its purposes, but is merely a charter to exist. The reasons for denying or withdrawing registration of a student organization shall not violate the University Policy on Human Rights.

It is the responsibility of each registered student organization to adhere to the mission of this University, its supporting strategic plan, policies, and procedures. Organizations must abide by all local, state, and federal laws. An organization’s goals, objectives, and activities must not deviate from established University policies and procedures. Because participation in student organizations may enhance a student’s educational experience and the University deems this important to our students’ success, registered organizations are entitled to certain privileges and benefits.

A. Benefits of Registration:

1. Registration as a University organization;
2. Establishment of an account in the Student Organization Business Office (SOBO), Fraternity Business Service, or Recreational Services and appropriate purchasing privileges in accordance with University policies;
3. Eligibility to apply for funds from mandatory Student Activity fees (i.e., for student organizations) or Recreational Services fees (i.e., for sports clubs);
4. Inclusion in appropriate University publications;
5. Utilization of the Center for Student Involvement & Leadership’s (CSIL) OrgSync software (funded by UISG & GPSG)
6. Utilization of the University’s trademarks in accordance with the UI Trademark Licensing Department’s program and policies;
7. Eligibility for use of campus meeting facilities and outdoor spaces;
8. Eligibility, but not the right, to utilize UI Fleet Services vehicles in accordance with state and University policies, procedures, guidelines, and insurance requirements;
9. Eligibility, but not the right, to utilize University staff and programming resources;
10. Eligibility, but not the right, to utilize Information Technology Services Mass Mail once each semester;
11. Eligibility to apply for awards and honors presented to University registered organizations and members; and
12. Eligibility to apply for Student Organization Office Suite (SOOS) or Student Activity Center (SAC) office space and/or storage space.

1. In order to exercise the privileges accorded to registered student organizations, students interested in starting a new registered student organization must first write a constitution for the potential student organization and hold a Pre-registration meeting with the appropriate CSIL staff, BEFORE filing the New Organization Registration Form online through OrgSync. This form includes organizational information and the organization's Constitution and Bylaws. Upon receiving this information, the CSIL staff will review it and submit it to the Student Organization Review Committee (SORC) for consideration. If approved for registration, the SORC will assign the appropriate registration tier (see below).

2. Eligibility/Registration Requirements

- a. Any group or organization which consists of and maintains at least 80 percent University students, whose purposes are consistent with the educational objectives of the University, and do not violate local, state or federal law, is eligible for registration by the University. To start a new registered student organization, the organization must consist of and maintain at least five (5) individuals as members, of which four (4) must be currently enrolled UI students.
- b. Membership. It is the policy of the University that all registered student organizations be able to exercise free choice of members on the basis of their merits as individuals without restriction in accordance with the University Policy on Human Rights. The University acknowledges the interests of students to organize and associate with like-minded students, therefore any individual who subscribes to the goals and beliefs of a student organization may participate in and become a member of the organization.

Membership and participation in the organization must be open to all students without regard to race, creed, color, religion, national origin, age, sex, pregnancy, disability, genetic information, status as a U.S. veteran, service in the U.S. military, sexual orientation, gender identity, associational preferences, or any other classification that deprives the person of consideration as an individual. The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons.

Membership in a student organization must be composed primarily of UI students (minimum 80% student membership) and be controlled and directed by UI students. Members are individuals who self-select to join an organization; "membership" is different from the audience a student organization targets, serves, or represents. The "audience" is not automatically considered a part of the organization's membership. Only UI student members shall have voting rights in a student organization. Membership is not open to persons under the age of 18 who are not enrolled UI students. Non-university community members who are at least 18 years of age may participate in the activities of student organizations but may not be voting members. If the student organization desires to allow persons under the age of 18 who are not UI students to participate in the activities of the student organization, the student organization must follow the requirements contained in the Youth Programs Policy Manual for RSOs, including that the youth participant must have permission to participate from a parent or guardian.

As some University services and benefits require knowledge of a student's membership in the student organization requesting the service or benefit, all organizations are encouraged to have a full membership roster on file with the Center for Student Involvement & Leadership via OrgSync. For example, if a member of a student organization wants to request approval to drive or ride in a university vehicle for an organization event or activity, that member must be listed on the organization's full membership roster located on OrgSync.

The student organization must be nonprofit in nature; student organizations affiliated with for-profit businesses are not eligible for registration. Student Representatives and student organization members must not profit or benefit financially from student organization membership.

- A. Primary and Secondary Student Representatives. Student Representatives are individuals who are authorized by the organization to speak for or represent the organization in its relations with the University and who are authorized to receive for the organization official notices, directives, or information from the University. Every student organization or potential student organization, registered with the Center for Student Involvement & Leadership/Recreational Services/academic deans via OrgSync must include the names of two student representatives in its Org Profile. Both Representatives must be currently enrolled UI students, and in academic and non-academic good-standing. One name will be designated as the Primary Representative and the other as the Secondary Representative. It is the responsibility of each student organization to update the Org Profile with the current names of Student Representatives. A student organization no longer under the direction of currently enrolled students may lose its registration.
- B. Access to University Resources. Registered student organizations are guaranteed an equal opportunity to apply for funds from mandatory Student Activity fees (i.e., for student organizations) or Recreational Services fees (i.e., for sports clubs) or for any other benefit conferred by the University of Iowa Student Government (UISG) or Graduate and Professional Student Government (GPSG) or their constituent bodies, without differentiation for reasons that violate the University Policy on Human Rights or inhibit the group's exercise of First Amendment rights of free expression and association. Nothing in this

section shall be reviewed and approved by the University of Iowa Interfraternity Council, Panhellenic Council, Multicultural Greek Council, or the National Pan-Hellenic Council. The University of Iowa Interfraternity Council, Panhellenic Council, Multicultural Greek Council, or the National Pan-Hellenic Council shall not be required to provide funding or other support for the program merits of funding or other proposals submitted by such student organizations.

- C. Registration Procedure. Throughout the year on an ongoing basis, the University will consider applications from student organizations that request to be registered. Registration of student organizations is granted by the Student Organization Review Committee (i.e., on behalf of the Center for Student Involvement & Leadership and Recreational Services) or an academic dean. Registration granted for sports clubs, and fraternities and sororities are subject to additional policies administered by their respective department or student governance organization(s). In order to receive funds from mandatory Student Activity fees (i.e., for student organizations) or Recreational Services fees (i.e., for sports clubs), a student organization must be confirmed by the UISG and/or GPSG or Recreational Services. Greek-letter social organizations are registered by the University of Iowa Interfraternity Council, Panhellenic Council, Multicultural Greek Council, or the National Pan-Hellenic Council.

1. To start an organization one must follow the step-by-step process listed on the "[Starting an Organization](#)" website.

Registration of student organizations that are residential living units (i.e., residence hall organizations, fraternities, and sororities) is granted by their respective student governance organization (i.e., Associated Residence Halls [ARH], Interfraternity Council [IFC], Multicultural Greek Council [MGC], National Pan-Hellenic Council [NPHC], and Panhellenic Council [PHC]) with the concurrence of the vice president.

The Student Organization Review Committee (SORC) shall review all student organization registration applications. Upon its evaluation, the Committee will register the student organization and forward the organization's application to the appropriate student governance organization or college/department/unit for confirmation; 2) register the organization subject to specific conditions on activities the organization is permitted to sponsor; or 3) reject the application. If an application is rejected the organization may appeal the decision of the SORC within 30 calendar days upon the receipt of their denial of registration letter. Appeals must be submitted in writing to either the Director of the Center for Student Involvement & Leadership (i.e., for student organizations) or the Director of Recreational Services (i.e., for sport clubs). If an organization appeals and is not satisfied with the decision rendered by the Director of the Center for Student Involvement & Leadership or the Director of Recreational Services they may then submit a final appeal in writing to the Dean of Students. There is no further appeal after the Dean of Students.

- D. Constitution and Bylaws. In order to complete the registration process, all student organizations must have an approved constitution and bylaws. Sponsored and affiliated student organizations (see Section 8, Registration Tiers) must also provide a copy of the charter, constitution, and/or bylaws of any organization external to the University with which such organization may be affiliated. Student organizations are required to include mandatory clauses within their organization constitutions.
- E. Registration of Inter/National Chartered Organizations. In addition to observing all University rules, an organization that is chartered by an inter/national organization, such as a Greek-letter social fraternity or sorority, must maintain its affiliation with the inter/national organization in order to retain its University registration. University registration will cease when the inter/national organization no longer recognizes or sponsors the student organization as an active organization. In this situation, the organization is no longer eligible to affiliate with their respective student governance organization, to participate in activities sponsored by the governance organization or its member organizations, or to access the privileges granted to registered student organizations. Once the inter/national organization has officially returned the student organization to affiliation status, the student organization representatives may apply to the University and the respective student governance organization for registration, although re-registration is not guaranteed. When the University removes registration of a student organization for violating University rules but the organization remains affiliated with the inter/national organization, the student organization will not regain their University registration by virtue of their relationship with the inter/national organization.
- F. Housing Organizations. Student organizations that provide off-campus housing to their student members are considered Housing Organizations. These include Professional Residence Groups, fraternal organizations with a professional focus that are recognized by an academic college, and Undergraduate Residence Groups, which includes Greek-letter organizations that are affiliated with their respective student governance organization.
1. In addition to all other student organization policies, Housing Organizations must fulfill the following expectations due to the level of responsibility and complexity involved in the service they provide:
 - a. Manage their housing unit;
 - b. Enforce internal organization rules;
 - c. Ensure that relevant national, state, and local laws and regulations are observed;
 - d. Provide safe and healthful lodging and cooperate with city or state agencies responsible for enforcing applicable health and safety laws; and

2. Organizations are eligible for the same privileges granted to registered student organizations which do not provide housing.
 3. The responsibility for the regulation and governance of professional fraternities that maintain chapter structures shall be with the Dean of the respective college, including professional fraternities registered by the College of Medicine, the College of Dentistry, College of Liberal Arts and Sciences, and the Graduate College.
 4. The possession or consumption of alcohol is prohibited in recognized undergraduate residence group housing except where explicitly authorized in writing by the vice president.
- G. Governance Organizations.
1. Registered student organizations are governed by the University of Iowa Student Government (UISG), Graduate and Professional Student Government (GPSG), or Associated Residence Halls (ARH).
 2. Undergraduate men's and women's social fraternities are governed by the University of Iowa Interfraternity Council, Panhellenic Council, National Pan-Hellenic Council, or the Multicultural Greek Council, which may establish, consistent with the University Policy on Human Rights, additional rules and regulations for recognition of new fraternities, membership selection standards, and standards of conduct.
 3. Reviews. In order to determine whether a student organization is in compliance with a student governance organization regulation or policy, University officials may from time to time review the organization's record. Information gathered as part of the review may include, but is not limited to, the following: aggregate grade point averages, membership figures, financial reports, internal rules and policies, insurance coverage schedules, educational programs for members, safety and security precautions, compliance with relevant municipal ordinances and state laws, and complaints to the Iowa City police.

II. Registration Tiers

Each student organization granted registration with the University of Iowa is classified as general, affiliated, or sponsored. The registration tier is determined by assessing the student organization's relationship to the University, the purpose and scope of its activities, the University population served, and the perceived potential risk to participants and the University.

The relationship of student organizations to the University is determined by evaluating the student organization's mission, goals, and activities as they relate to the mission, vision, goals and culture identified by the University in its Strategic Plan.

The privileges and responsibilities associated with each type of registered student organization are outlined below.

- A. General Student Organizations: The privileges of becoming a registered student organization at the University are not extended without careful consideration. General student organizations are those that are consistent with the mission and culture of the University and engage primarily in activities that benefit their membership. These organizations are primarily interest groups capable of functioning with minimal support. The University registers but does not support or endorse the purposes of these general organizations and may not accept responsibility or liability for the activities undertaken by the student organization.

In addition to the University resources available to all registered student organizations, general student organizations may receive third priority consideration for:

- Student Organization Office Suite (SOOS) or Student Activity Center (SAC) office or storage space; and
- Reservable space for University-wide annual events at the Iowa Memorial Union, other University facilities, and outdoor venues through the IMU Event Services process and other University scheduling processes.

- B. Affiliated Student Organizations: Affiliated student organizations are those that serve a specific University interest and may provide support to University programs and initiatives. They contribute to the mission, vision, goals, and culture of the University by routinely presenting events for their members, the campus, or their related department's or unit's members and invited guests. A University department or unit must provide oversight and direct responsibility for the organization and its activities. Affiliated student organizations also may be directly associated with an academic course and its requirements.

In addition to the University resources available to all registered student organizations, affiliated student organizations shall comply with any rules, procedures, and expectations established by the responsible University department or unit.

Because of their broad impact, affiliated student organizations may receive second priority consideration for:

- Student Organization Office Suite (SOOS) or Student Activity Center (SAC) office or storage space; and
- Reservable space for University-wide annual events at the Iowa Memorial Union, other University facilities, and outdoor venues through the IMU event services process and other University scheduling processes.

Affiliated student organizations will need to follow appropriate criteria and guidelines from each University department or unit to receive these services and benefits.

C. **Sponsored Student Organizations:** Sponsored student organizations are those considered critical to the mission and culture of the University and work in partnership with a University department or unit. These organizations are linked to the University because of their role representing the University or in presenting events of broad appeal that are considered an integral part of the institution and its activities. Sponsored students organizations routinely present events for the campus and broader community, and typically work in a collaborative relationship with a University department or unit. The student organization's purpose and effect are to serve a broad segment of the campus community, not just its membership.

Once registered, the events and activities presented by the student organization should accurately and positively reflect the mission, vision, goals and culture of the University, as well as the rules and standards of the institution and its activities. The registration process requires action by both student leaders and University officials. As such, this process creates a mutually beneficial relationship between sponsored student organizations and the University.

In addition to the University resources available to all registered student organizations, sponsored student organizations shall have:

- A full-time professional staff or faculty member whose job description designates them as the primary adviser to the sponsored student organization in accordance with student organization registration requirements. These advisers are considered experts within the respective student organization's area of interest;
- A University department or unit that provides oversight and direct responsibility for the student organization and its activities; and
- Routinely presented events of broad appeal for the campus and community. Student organization operations and event planning are complex, and the majority of the events/programs are University-wide. Sponsored student organizations routinely present events for the campus and broader community, and are expected to work closely with the appropriate University department or unit in the planning of these events.

Because of high complexity, sponsored student organizations may receive first priority consideration for:

- Student Organization Office Suite (SOOS) or Student Activity Center (SAC) office or storage space; and
- Reservable space for University-wide annual events at the Iowa Memorial Union, other University facilities, and outdoor venues through the IMU event services process and other University scheduling processes.

Sponsored student organizations must follow appropriate criteria and guidelines from each respective University department or unit to receive these services and benefits.

III. Tier Appeals

An appeals process exists for those organizations desiring a registration tier different than that into which they were initially placed. Based on additional information, an organization's registration tier or may be modified also by the Student Organization Review Committee (SORC).

1. **Appeals – Recognition Tier Decision.** A student organization has the right to appeal a tier designation decision of the SORC or the determination by the Center for Student Involvement & Leadership to change or modify a student organization's recognition tier. An appeal provides a limited review of the original decision. It is not an opportunity to present the evidence again or to re-evaluate credibility. If an error has been made, in most cases the matter will be returned to the SORC so that the error may be corrected.

One of the following two conditions must be used as a basis for appeal:

- Discovery of new information that was not available at the time of the decision; and/or
- The appropriate processes for registering student organizations were not followed.

Written documentation stating the grounds for appeal must be filed with the appeal administrator within ten (10) business days of receipt of the original SORC decision.

The appeal administrator will decide one of the following:

- Uphold the original decision;
- Remand the case back to the SORC for reconsideration consistent with the findings of the appeal administrator;
- Remand for a new registration process review of the student organization; or
- Modify the registration tier assigned by the SORC.

The appeal administrator will provide a written decision to the SORC Chair within ten (10) business days of the appeal review. An appeal may be taken within ten (10) business days to the Dean of Students.

IV. Registration Renewal

- A. Each student organization must renew its Profile on OrgSync at or near the beginning of the fall (between Aug. 1-Sept. 15) and spring (Jan. 1-Feb. 15) semesters, even if there are no changes from the previous semester in primary and/or secondary representative and contact information. A student organization that does not update and renew its profile will lose its registration automatically for one semester. Any changes in primary or secondary representative or changes in contact information must be reflected in the profile. Registered student organizations must provide complete and accurate information as requested in the profile. If additional information is needed, student organization representatives must provide information upon request to the Center for Student Involvement & Leadership or Recreational Services. For those student organizations that are registered by an academic college as well as by a student government, student leaders are advised to check with the college/department/unit regarding registration deadlines.
- B. From time to time, the Student Organization Review Committee reviews the status of student organizations to ensure the safety and welfare of students who participate in activities sponsored by the organization. Depending upon the results of its evaluation, the Committee will 1) register the student organization; 2) register the student organization subject to specific conditions on activities the organization is permitted to sponsor; or 3) recommend to the Director of the Center for Student Involvement & Leadership or Director of Recreational Services that registration be denied.

V. Organizational Registration Changes

- A. During the year, registered student organizations must report to the Center for Student Involvement & Leadership or Recreational Services any amendments to or changes in its student organization name, constitution, by-laws, student representatives, and/or advisers within two weeks of the changes becoming effective. Registered student organizations also must submit any additional information requested from time to time by their respective registering body.

VI. Advisers

- A. Student organization advisers are strongly encouraged for all registered student organizations. Advisers shall be faculty members whenever possible in order to promote student-faculty interaction beyond the classroom. Professional & Scientific staff with advising experience and/or relevant expertise also may serve as student organization advisers. Merit staff, with advising experience and/or relevant expertise also may serve as student organization advisers upon approval from the Center for Student Involvement & Leadership, Recreational Services, or academic dean. A non-University affiliated individual may serve as an adviser to a student organization only if they serve as a liaison to a local/regional/national organization with which the registered student organization has an official affiliation.
- B. Student organization advisers must be employed at the University on at least a .5 FTE basis. The Division of Student Life shall have the right not to approve advisers of student organizations who are on disciplinary status as determined by the

- C. All student organization advisers are strongly encouraged to participate in the adviser training programs sponsored by the Center for Student Involvement & Leadership. The Center for Student Involvement & Leadership and Recreational Services will provide specific information to student organizations about these requirements.
- D. Graduate assistants, with at least 50% appointments, may serve as additional advisers in conjunction with student organization advisers who meet the requirements stated above; however, they will not have signatory authority (e.g., financial transactions, contracts, vouchers).

VII. Space Allocation for Registered Student Organizations

- A. Limited office or storage space is available to registered student organizations in the Student Organization Office Suite (SOOS) or Student Activity Center (SAC) in the Iowa Memorial Union. Student organizations allocated space in the SOOS or SAC must abide by the policies in regard to use of office or storage space. Application forms for the office and storage space are available online through the Center for Student Involvement & Leadership website (<http://csil.uiowa.edu/>). Office and storage space requests are reviewed annually by the CSIL Space Allocation Committee and recommendations for assignment of space are made to the Director of the Iowa Memorial Union and Center for Student Involvement & Leadership. Sport Clubs are required to follow all policies in regard to storage space established by Recreational Services.

Engaging students, supporting positive community behavior, and enriching the college experience through educationally-purposeful activities, service, and community building.

Office of the Dean of Students

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EXHIBIT B

Statement of Religious Diversity and the University Calendar

Religious history, religious diversity, and spiritual values have formed a part of The University of Iowa's curricular and extracurricular programs since the founding of the University. In order to advance religious diversity on campus, the University makes reasonable accommodations for students, staff, and faculty whose religious holy days coincide with their work schedules and classroom assignments. As a public institution, the University neither promotes any particular form of religion nor discriminates against students, staff, or faculty on the basis of their religious viewpoints.

University holidays are not religious holy days, although a religious holy day may coincide with a University holiday. The University is prepared to make reasonable accommodations in its work assignments, test schedules, and classroom attendance expectations in a manner which is consistent with the University Policy on Human Rights and does not unfairly burden employees and students.

Students

With regard to classroom attendance, students who notify the faculty (including teaching assistants) of a religious holy day conflict in a timely manner shall be excused from class or other scheduled academic activity to observe a religious holy day of their faith. Where attendance is mandatory, students compelled by their religious convictions to refrain from attending class on specific days must notify their instructors during the first few days of the semester or session, and no later than the third week or one week before the absence if a conflict occurs before that time.

Students who notify their instructors of a religious holy day conflict in a timely manner shall be permitted a reasonable amount of time to make up the material or activities covered in their absence, including tests. Students who receive an exemption on religious grounds cannot be penalized for failing to attend class on the days exempted. The instructor may, however, appropriately respond if the student fails to satisfactorily complete any alternative assignment or examination.

In those cases where a request for an excused absence based upon a religious holy day conflict is denied by the instructor, a student may pursue a grievance under “Student Complaints Concerning Faculty Actions” (posted in *Policies & Regulations Affecting Students*, sub-section D (</policies/student-complaints-concerning-faculty-action/>)). Where a timely request is made but denied by the instructor, the grievance process shall be expedited as much as reasonably possible to ensure that a student pursuing a religious holy day accommodation is not unduly disadvantaged by the passage of time.

Students with attendance conflicts may be required to notify an instructor in writing. An instructor who requires written notice must inform the class of this expectation in the class syllabus. An instructor may deny a student’s request for an excused absence on the ground that the request was not made within a reasonable time period, that is, no later than the third week of class or one week before the absence if a conflict occurs before that time.

Faculty

Faculty members have “the responsibility to meet classes as scheduled and, when circumstances prevent this, to arrange equivalent alternate instruction” (*University of Iowa Operations Manual* (<http://opsmanual.uiowa.edu/human-resources/professional-ethics-and-academic-responsibility/responsibilities-students>), Section III, Chapter 15.2.b). Faculty members who wish to observe religious holy days must fulfill the above-mentioned policy and satisfy any other responsibilities regarding off-campus time, including proper notice, in accordance with their standard departmental procedures.

When scheduling tests, instructors are encouraged to take cognizance of religious holy days which fall on University class days. In addition, faculty should include in their syllabi information regarding the policies for handling conflicts between classroom activities

(attendance, tests, etc) and religious holy days. Staff policies must be consistent with University policies (see the section for “Students” above).

Staff

Staff members may request accommodation for religious observances through their immediate supervisor. Accommodation may be in the form of scheduled leave or an alternate work schedule. Approved absences will be recorded as vacation. In cases when vacation is not available or an alternative work schedule is not possible, a leave of absence without pay may be permitted. Departments will attempt to accommodate such requests, balancing the request to accommodate with the particular needs of the work unit.

In order to best meet staff needs in an area, appropriate advance notice is required.

EXHIBIT C

[Home](#) > [II. Community Policies](#)

Chapter 3 – Human Rights

(Amended 9/14; 7/1/17)

For related policies, see [II-14](#) Anti-Harassment, [II-4](#) Sexual Harassment, and [II-11](#) Anti-Retaliation.

[3.1 Policy and Rationale](#)

[3.2 Definition of Terms Used in This Policy](#)

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3.1 Policy and Rationale

The University of Iowa brings together in common pursuit of its educational goals persons of many nations, races, and creeds. The University is guided by the precepts that in no aspect of its programs shall there be differences in the treatment of persons because of race, creed, color, religion, national origin, age, sex, pregnancy, disability, genetic information, status as a U.S. veteran, service in the U.S. military, sexual orientation, gender identity, associational preferences, or any other classification that deprives the person of consideration as an individual, and that equal opportunity and access to facilities shall be available to all. These principles are expected to be observed in the internal policies and practices of the University; specifically in the admission, housing, and education of students; in policies governing programs of extracurricular life and activities; and in the employment of faculty and staff personnel. Consistent with state and federal law, reasonable accommodations will be provided to persons with disabilities and to accommodate religious practices. The University shall work cooperatively with the community in furthering these principles.

3.2 Definition of Terms Used in This Policy

- a. Alleged victim: a person against whom discrimination has allegedly occurred.
- b. Complainant: the person who brings a complaint of violation of this policy, who could be an alleged victim or a third party.
- c. Graduate assistant: a graduate student employed by the University as a research assistant or teaching assistant.
- d. Instructor: a person engaged in teaching students or in evaluation or supervision, direct or indirect, of a student's academic work.

- e. Member of the University community: any University student, or faculty or staff member.
- f. Protected interests: University employment, education, on-campus living, or participation in a University activity.
- g. Respondent: a person or unit that has been accused of discriminating against one or more individuals.
- h. Specific and credible allegations: allegations that provide factual details such as, but not limited to, time, place, actions, participants, and witnesses. Allegations do not necessarily have to be based on firsthand observation of events to be "specific and credible," but direct observation normally results in greater specificity and credibility than indirect knowledge.
- i. Supervisor: a person who has authority either: 1) to undertake or recommend tangible employment decisions (those that significantly change an employee's employment status, such as, but not limited to, hiring, firing, promoting, demoting, reviewing performance, reassigning, and compensation decisions) affecting an employee, or 2) to direct the employee's daily work activities.
- j. Third-party complainant: a person who brings a complaint alleging an act of discrimination against someone else.

3.3 Bringing a Complaint

- a. Persons who believe they have been subjected to discrimination in violation of the policy are encouraged to report it, even if they are not certain whether a violation of this policy has occurred. A complaint that this policy has been violated may be brought to the Office of Equal Opportunity and Diversity (EOD), 202 Jessup Hall, through informal or formal channels by any member of the University community, including a third party, or by the University itself. A complaint must state specific and credible allegations of discrimination to warrant an investigation. There is no time limit for bringing a complaint; however, it may be difficult to substantiate the allegations if they are made after significant time has passed. Therefore, prompt reporting of complaints is strongly encouraged.

Anyone (victims or others) who wishes to consult with someone about a specific situation without making a complaint, or who wishes simply to learn more about enforcement of this Human Rights Policy may contact any of the following offices or organizations:

- (1) Office of the Ombudsperson (for faculty, staff, students, and persons not affiliated with the University), C108 Seashore Hall;
- (2) Employee Assistance Program (for faculty or staff), 121-50 University Services Building;
- (3) University Counseling Service (for students), 3223 Westlawn;
- (4) Women's Resource and Action Center (for faculty, staff, or students), Bowman House.

- b. Informal complaints. An informal complaint is a request that the Office of Equal Opportunity and Diversity seek to reach an informal resolution of the complainant's concerns. The procedures for such complaints are designed to be flexible so as to enable the Office of Equal Opportunity and Diversity to address an individual's situation in the most effective and expeditious manner possible. Resolutions of informal complaints are accomplished with the assistance of other offices or administrators on campus in the area relevant to the complaint.

In the case of an informal complaint, the accused party normally will not be informed of the complainant's action or identity without the consent of the complainant unless circumstances require. When allegations are addressed through an informal resolution process, no disciplinary action may be taken against the respondent, and there will be no record of the allegations in the respondent's personnel file or student disciplinary file, unless the person is notified of the allegations and given an opportunity to respond.

- c. Formal complaints. A formal complaint of discrimination involves an impartial investigation of the complainant's allegations by the Office of Equal Opportunity and Diversity. The investigation begins when the Office provides written notice to the respondent of the filing of the complaint, the identity of the complainant, and the general allegations of the complaint. The respondent is then interviewed regarding the specifics of the allegations and given an opportunity to respond fully to the allegations. The Office of Equal Opportunity and Diversity may also interview other persons believed to have factual knowledge relevant to the allegations. The purpose of the investigation is to establish whether the Office of Equal Opportunity and Diversity finds a reasonable basis to conclude, by the preponderance of the evidence, that the respondent violated the Policy on Human Rights.

The Office of Equal Opportunity and Diversity will issue written findings outlining the basis for its conclusions. The written finding normally will be issued within 60 days of when the complaint was filed. When it is not reasonably possible to issue the finding within that time, the Office of Equal Opportunity and Diversity will notify the alleged victim and the respondent that the finding will be delayed and indicate the reasons for the delay. This report is provided to the administrative officials responsible for the area in which the respondent is involved, the alleged victim, the respondent, and the chief administrative officer in the unit (e.g., the Provost in a complaint filed against a faculty member; the vice president or dean for the unit in the case of a staff member; or the Vice President for Student Life in the case of a student) or his or her designee. Third-party complainants will be notified only that the proceedings are concluded.

3.4 Process for Sanctions

- a. In the case of formal complaints, the following administrators will review the findings of the Office of Equal Opportunity and Diversity investigation:
- (1) the Office of the Provost, if the respondent is a faculty member or other instructional personnel (except graduate assistants);
 - (2) the office of the vice president or dean responsible for the unit employing the person charged, if the respondent is a staff member (including a graduate assistant, in which case the Dean of the Graduate College also must be notified in order to determine whether ramifications apply for the student's academic progress);
 - (3) the Dean of Students, if the respondent is a student (including a graduate student, in which case the Dean of the Graduate College also must be notified in order to determine whether ramifications apply for the student's academic progress).
 - (4) the appropriate administrator above, if the respondent is a unit.
- b. The administrator who receives the report shall:

(1) discuss it with EOD in order to determine, based on EOD's findings and input, appropriate corrective measures and/or sanctions. If the respondent is a staff member, the administrator will also consult with the Senior Human Resources Leadership Representative in the unit. If the respondent is a faculty member, graduate assistant, or unit, the administrator will also consult with the appropriate dean and departmental executive officer. When a respondent staff member, faculty member, or graduate assistant is also a student, the administrator and the Dean of Students will also consult with one another in determining what corrective measures or sanctions should be pursued.

(2) implement appropriate corrective measures and/or sanctions consistent with University procedures. The administrator must inform EOD in writing of the actions that are taken in response to EOD's findings.

(3) insure that the alleged victim is informed when action is taken.

c. Violations of the Human Rights Policy may lead to sanctions up to and including termination or separation from the University. If the respondent is a unit, sanctions may include changes to unit policies or processes, or other appropriate actions. Sanctions for violations of this policy should be commensurate with the nature of the violation and the respondent's disciplinary history. It is the responsibility of the appropriate administrator to follow-up with the parties at a reasonable interval(s) to assess their compliance with the sanctions imposed. More serious sanctions up to and including termination of employment or separation from the University may be imposed in the event that the individual fails to comply with the sanctions initially imposed.

3.5 Applicable Procedures

(Amended 7/1/17)

Formal sanctions imposed in response to alleged violations of this policy will be governed for:

- a. faculty members by III-29 Faculty Dispute Procedures and that portion of those procedures dealing with faculty ethics (III-29.7).
- b. staff members by applicable Regent Merit System Rules and University policies, including III-16 Ethics and Responsibility Statement for Staff, and the applicable grievance procedures, including III-28 Conflict Management Resources for University Staff;
- c. graduate assistants, when dismissal is sought, by the procedure for dismissal of graduate assistants (III-12.4). When sanctions other than dismissal are imposed by the dean of the employing college, a graduate assistant may appeal through those procedures established for graduate assistant employees;
- d. students by the Student Judicial Procedure.

3.6 Appeal Procedures

If the Office of Equal Opportunity and Diversity concludes that the complaint is unfounded, the complainant may appeal the finding on the grounds that the decision was arbitrary and capricious or that the investigating office did not follow procedures resulting in prejudice to the complainant. Appeals must be made electronically or in writing and submitted together with all supporting documentation to the Office of Equal Opportunity and Diversity within 10 University business days of the receipt of the finding. Generally within two University business days, the Office of Equal Opportunity and Diversity will transmit the notice of appeal and the case record to the appropriate appeal officer, as described on the EOD website. The appeal officer, or the appeal officer's designee, will issue a written

decision on the appeal to the complainant and the Office of Equal Opportunity and Diversity within 20 University business days of the receipt of the appeal, although this time frame may be extended due to the complexity of the case or the severity of the allegations.

In cases where the appeal is denied, such action constitutes final University action on the matter, subject to appeal to the Board of Regents. In cases where the appeal is successful, in whole or in part, the appeal officer/designee will advise the Office of Equal Opportunity and Diversity regarding appropriate measures to address the issues of concern raised in the appeal.

For complaints that conclude in a finding that there is a reasonable basis to believe that a policy violation has occurred and sanctions have been imposed, respondents may appeal such findings through the grievance procedures applicable to them. The respondent may challenge any sanctions imposed as a result of a finding through available grievance procedures.

3.7 Protection Against Retaliation

- a. Retaliation against alleged victims, complainants, and/or witnesses who provide information during an investigation pursuant to this policy is prohibited by II-11 Anti-Retaliation. Reasonable action will be taken to assure that alleged victims, complainants, and/or witnesses suffer no retaliation as a result of their activities with regard to the process.
- b. Any retaliation against alleged victims, complainants or witnesses should be reported pursuant to II-11 Anti-Retaliation. Retaliation may result in sanctions against the person committing the retaliatory act(s).

3.8 Protection of the Respondent

- a. This policy shall not be used to bring knowingly false or malicious allegations. Making such allegations may subject the complaining party to sanctions up to and including termination or separation from the University. Any such action will be initiated by the appropriate administrator overseeing the complainant(s).
- b. In the event the allegations are not substantiated, reasonable steps will be taken to restore the reputation of the respondent if it was damaged by the proceeding. The respondent may consult with the investigating office regarding reasonable steps to address such concerns.

3.9 Confidentiality

- a. In order to empower community members to voice concerns and bring complaints, the confidentiality of all parties will be protected to the greatest extent possible. However, confidentiality cannot be guaranteed.
- b. Alleged victims, third-party complainants, and respondents are expected to maintain confidentiality as well. They are not prohibited from discussing the situation outside of the work or educational environment. However, the matter should not be discussed with individuals who are members of their University work or educational environment.
- c. Dissemination of documents relating to complaints of Human Rights Policy violations and/or to the investigation of such complaints, other than as necessary to pursue an appeal, grievance, or other legal or administrative proceeding, is prohibited.
- d. Failure to maintain confidentiality by a respondent may be considered to be a form of retaliation in violation of II-3.7 of this policy. Failure to maintain confidentiality by any party (alleged victim, third-party complainant, or

EXHIBIT D

Constitution (Bylaws) of
The University of Iowa Feminist Majority Leadership Alliance

Preamble

We, the members of The University of Iowa Feminist Majority Leadership Alliance, establish this Constitution on April 12, 2001.

ARTICLE I. Name

1. The name of this organization will be The University of Iowa Feminist Majority Leadership Alliance, henceforth referred to as the local campus unit.
2. This organization will be a non-profit, non-sectarian, non-partisan, voluntary organization associated with the Feminist Majority Foundation.
3. The name Feminist Majority Leadership Alliance may be used only with the approval of the Feminist Majority Foundation. The Feminist Majority Foundation shall have the power to withdraw permission for use of the name Feminist Majority Leadership Alliance at any time that the local campus unit or its officers or members fail to conduct themselves within the purpose and principles of the Feminist Majority Foundation or fail to adhere to the standards set by the Feminist Majority Foundation for local campus units.

ARTICLE II. Purpose

The purposes of the Feminist Majority Leadership Alliance of The University of Iowa will be:

1. To establish a broad constituency to work in pursuit of feminist ideals00social, political, and economic equality for all.
2. To study and take action on national, campus, and local feminist issues and concerns.
3. To provide leadership and career building opportunities for feminist students.
4. To educate the college/university community about feminist issues.
5. To enhance feminist community on campus.

ARTICLE III. Principles

1. The Feminist majority Foundation promotes equality between women and men and boys and girls, and supports constitutional and statutory measures to gain full equality locally, statewide, nationally, and globally.
2. The Feminist Majority Foundation supports safe, legal and accessible abortion, contraception, and family planning, including Medicaid funding and access for minors.

3. The Feminist Majority Foundation is dedicated to achieving civil rights for all people, including affirmative action programs for women and people of color.
4. The Feminist Majority Foundation supports lesbian and gay rights.
5. The Feminist Majority Foundation does not permit discrimination on the basis of sex, race, sexual orientation, socioeconomic status, religion, ethnicity, age, marital status, national origin, or disability.
6. The Feminist Majority Foundation promotes non-violence and works to eliminate violence against women.
7. The Feminist Majority Foundation encourages programs directed at the preservation of the environment, clean air and water, the elimination of smog, toxic and hazardous wastes, chemical and nuclear weaponry.
8. The Feminist Majority Foundation supports the Feminist Agenda as enunciated in Unit 1 of the Study and Action Manual.

ARTICLE IV. Local Campus Unit Standards

1. Any student of The University of Iowa who agrees with the Feminist Majority Foundation's purposes and principles as stated above may apply for membership in the local campus unit. Criteria for admission to the unit include written agreement with the organization's principles, commitment to participate in unit activities, and leadership/activist experience or potential.
2. The local campus unit may not discriminate on the basis of sex, race, sexual orientation, national origin, age, religion, ethnicity, or disability, and affirmatively seeks to achieve diversity among participants.
3. Within two years of its formation, the campus unit shall maintain a membership of at least forty people.
4. The campus unit shall have a minimum of one and preferably multiple faculty and staff advisors.
5. The campus unit shall hold at least one meeting per week during the school year.
6. The campus shall interrelate with the Feminist Majority Foundation Community Council once the community council is established.

ARTICLE V. Members

1. In no aspect of its programs shall there be any difference in the treatment of persons on the basis of race, national origin, color, creed, religion, sex, age, disability, veteran status, sexual orientation, gender identity, or associational preference, or any other classification which would deprive the person of consideration as an individual. The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons.

ARTICLE VI. Executive Committee

1. The Executive Committee of the campus unit shall be comprised of the President/Campus Unit Coordinator, Vice President/Campus Campaign

Coordinator, Equality Chair, Community Outreach Chair, Public Relations Chair, Events Chair, Finance Chair, Communications Chair and Class Representatives..

2. Duties and responsibilities of Executive Committee:

President/Campus Unit Coordinator: The President presides over general campus unit meetings; acts as a spokesperson for the group; chairs the executive committee; acts as a liaison to faculty, administration, faculty advisor(s), student government, and the East and West Coast offices of the Feminist Majority Foundation; and is ultimately accountable for the recruitment of new membership.

Vice President/Campus Campaign Coordinator: The Vice President chairs the Campus Campaign; communicates with Feminist Majority Foundation Field Representatives and the East and West Coast offices of the Feminist Majority Foundation; is responsible for coordinating Field Representative campus visits; and works with the President as a trainee for the position the following year (optional). The Vice President is also responsible for keeping the minutes for each meeting and submitting them to the Field Representative; recruit faculty and staff for the Faculty/Staff Team.

Community Outreach Chair/Coordinator: The Community Outreach Chair acts as a liaison to the Leadership Alliance Community Council in the local community; oversees projects involving local clinics, i.e. Adopt a Clinic, and other community organizations.

Equality Chair: The Equality Chair is responsible for ensuring that the Feminist Majority Leadership Alliance is representative of the school's student body in terms of sex, race, sexual orientation, socioeconomic status, religion, ethnicity, age, marital status, national origin, disability and academic year. The Equality Chair coordinates programs that focus on issues of diversity and the elimination of discrimination on campus and the greater community. She or he is in charge of on-going coalition building with progressive groups of campus; organizing an alliance of all progressive groups on campus (if one does not exist on campus) and actively participating in the progressive alliance.

Public Relations Chair/Coordinator: The Public Relations Chair acts as a liaison to both campus and community press, garnering press coverage for the group whenever there is an opportunity. The PR chair coordinates the advertisement and publicity of events and is responsible for ensuring the development of visuals.

Events Chair/Coordinator: The Events Chair is responsible for planning social events, a leadership retreat, and providing short community building activities for each general meeting. The Events Chair is also working with the Recruitment Chair in planning events for the purpose of recruitment; maintain constant communication with Field Representative during all event planning.

Finance Chair/Coordinator: The Finance Chair is responsible for handling all accounting for the group and planning at least two fund-raisers a year, including one Rock-for-Choice Concert. The Finance Chair reports on the status of the accounts at each meeting.

Communications Chair/Coordinator: The Communications Chair submits quarterly reports to the Feminist Majority Foundation detailing the Leadership Alliance's activities; and submits information pictures for the quarterly Feminist Majority Report detailing events and projects the Leadership Alliance has undertaken. The Communications Chair is also responsible for submitting information to Feminist Majority Foundation On-line and working with the Feminist Majority Foundation's Cyberspace Representative; keeping the local campus unit membership informed via e-mail; and contacting the other campus unit Communications Chairs nationwide.

Recruitment Chair/Coordinator: The Recruitment Chair is a leadership position recommended for a sophomore/second year student. She/he is responsible for consistent recruitment; planning events to increase membership throughout the year; working with Faculty and Staff on strategies to improve recruitment. The Recruitment Chair plans events with the Equality Chair to ensure a diverse membership and sets on going recruitment goals.

Class Representatives/Officers: Each class will be represented on the Executive Committee by one or more Class Representatives. Each Representative is responsible for attending Executive Committee meetings and voicing concerns of their class. The Class Representatives will share responsibility for maintaining a Feminist Majority archives, including press clippings and photographs of the Leadership Alliance members and events. The Class Representatives will also share responsibility for updating the Leadership Alliance on global, national, and/or local feminist news at weekly meetings.

3. Officers and members must be currently registered students at The University of Iowa in good academic standing. Officers must be members for at least one term prior to election, except for the first year that the local campus unit is established.

ARTICLE VII. Meetings and Procedures

1. Member in Good Standing/Voting Eligibility
 - A. Members who attend at least 50 percent of the regularly scheduled meetings during the academic year and have been members for at least 30 days are considered members in good standing and are eligible to vote on organizational matters and in local campus unit elections.
 - B. Non-members and non-students are welcome to observe open campus unit meetings, but may not hold offices or vote on organizational issues or in elections

2. Election of Officers

- A. Officers shall be elected by a majority vote of the eligible voting members of the local campus unit. Elections will be held on an annual basis during the Spring term, at a meeting comprised of a quorum (40%) of the organization's members. Special elections may also be held as needed to fill executive committee vacancies.
- B. All voting shall be done by secret ballot.
- C. Officers shall serve for the academic year following their election.
- D. Results of all elections and officer contact information must be submitted to the Feminist Majority Foundation.
- E. Elections will be held annually during March, Women's History Month.

3. Removal of Officers

Any Officer of the local campus unit who violates the organization's purpose or Constitution, injures the organization, or fails grievously to fulfill duties as stated may be removed from office by the following process:

- A. Written notification to the officer of the request, asking the officer to be present at the next meeting prepared to speak in her/his own defense;
- B. Written notification to the membership; and
- C. Seventy-five percent of the voting membership must be in attendance to vote on the removal of an officer. A two-thirds majority vote of members present is necessary to remove the officer.
- D. Robert's rules of Order will govern the removal or dismissal of officers or members.

4. Replacement

Should an officer resign or be removed, a special election will be held one week after written notification of all voting members.

5. Meetings

Regular group meetings will occur on a weekly basis at a time to be selected at the beginning of each academic year.

ARTICLE VIII. Finances

- 1. There are no dues.
- 2. The Finances Coordinator is in charge of all actions required by the Student Organization Business Office
- 3. Upon dissolution, state money and mandatory student fees revert back to the granting organization. Group fees should be divided as stated in the Constitution and carried out by the dissolving group's members and officers. If the group has dissolved and group fees have not been divided as stated in Constitution by five years from last account activity, monies in the group's 00 account will revert to an account specified for this purpose within UISG/ECGPS. These funds will then be available for distribution through SABAC or GPAC guidelines in compliance with University of Iowa policy.

ARTICLE IX. Amendments

Amendments to the constitution must be approved first by a two-thirds majority of members voting and second by the Feminist Majority Foundation.

ARTICLE X. Parliamentary Authority

The rules contained in the current edition of Robert's Rules of Order, Newly Revised shall govern the campus unit in all cases to which they are applicable and in which they are not inconsistent with these bylaws and any special rules of order the campus unit may adopt.

EXHIBIT E

CONSTITUTION OF KOREAN AMERICAN STUDENT ASSOCIATION

Preamble: Korean American Student Association

Revised Date: March 2015

Article I

Purpose: the purpose of the Korea American Student Association (KASA) at the University of Iowa is to introduce and offer students an opportunity to see the different facets of the Korea American culture. Through educational, community and social activities, KASA will provide a place where students will learn about the Korean American heritage and form friendships through their interest in the Korean American culture.

Article II

Membership

- Section 1: In no aspect of its programs shall there be any difference in the treatment of persons on the basis of race national origin, color, creed, religion, sex, age, disability, veteran status, sexual orientation, gender identity, or associational preference, or any other classification which would deprive the person of consideration as an individual. The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons.
- Section 2: Members must exhibit an optimistic attitude towards Korean culture.
- Section 3: KASA is composed of members, executives, and University faculty/staff. Members in executive positions must be present at meetings, proactively engage in events and be responsible for their assigned duties. All members have the right to make suggestions or voice objections.
- Section 4: Membership is non-selective and open to all students that portray a positive interest in the Korean and Korean American culture. If any member possesses a negative attitude or represents the organization in a damaging manner, his/her membership will be revoked.

Article III

Officers and Duties

- a. President
- b. Vice President
- c. Secretary
- d. Treasurer
- e. Public Relation/Marketing Chair
- Section 1: President leads the organization and acts as the advocate for KASA as a whole
 - The duties of the President shall be to preside at all meetings, to call special meetings, to help out other executive board members when they need help, and to appoint any committees necessary to carry out the objectives of the organization.
- Section 2: Vice President assists the president in decision-making and execution of events
 - The duties of the Vice-President shall be to perform all the duties of the President in his/her absence, to send executive board meeting minutes out within 48 hours after the meeting, to help treasurer with forms, letters, and requests, to contact Korean professor and inform Korean classes about KASA every beginning of the school year, and to help president overall and organize events as need.
- Section 3: Secretary acts as the liaison for the organization and shall records meeting minutes for general meetings and sends to all KASA members.
 - The duties of the secretary shall be to keep and accurate, permanent record of the proceeding of the organization, to send general meeting minutes out within 48 hours after the general meeting, to remind members about events/meetings by emails, and to take care of social networking web pages.
- Section 4: Treasurer allocated and designated funds to appropriate events and needs of the organization
 - The duties of the treasurer shall be to take care of monetary transactions, to file budget requests on OrgSync, to organize fundraising scheduling, request letters/emails, and funding forms, and to write letter for donations for all the Korean Professors on the campus

- Section 5: When the executive members need to make decisions, they have to get an agreement with the president first then discuss with other executive members.

Article IV

Voting

- Section 1: A member desiring to obtain an executive position is free to run for that position by making know to the organization during a meeting. Elections will be held towards the end of each academic year and all members present will vote. The candidate with the majority of votes will obtain that position. Each position will be separately voted upon
- Section 2: Only members who have been involved in KASA for more than half a year have rights to run for executive positions.
- Section 3: Only members who have been participated at least 3 meetings and 3 events per semester can run for the positions.
- Section 4: If an executive needs to be added, the KASA executive members will take a vote. Once majority rules of the person to be added, the rest of the executive members will equally share the responsibility of the executive added.
- Section 5: Any executive board member may be impeached by the executive board. Any executive board member facing impeachment may have the change to defend him/herself in front of the executive board. Any executive board member may be impeached if the majority of the executive board votes in favor of impeachment
- Section 6: Executive members meetings will be held weekly. Executive members are expected to attend these meetings unless given notice to the president two weeks in advance.
- Section 7: Any executive board member who wishes to resign from his or her position must notify the rest of the executive board and a written statement

Article V

Faculty Advisor

- There shall be one official Faculty Advisor
 - The duties of the Faculty Advisor shall be to sign off required approval forms and provide advising when needed

Article VI

Meetings

- Section 1: Meetings will be held bi-weekly. The president in office will arrange times and locations for the meetings.
- Section 2: Within the first week of the academic school year the executive board will come to a decision regarding the weekly meetings and the board is expected to attend these meetings.
- Section 3: Any three executive members must be present in order for a quorum to take place.
- Section 4: Any executive members have the authority to call meetings when it is needed.
- Section 5: Any executive members have the right to speak during the meetings and suggest the ideas.

Article VII

- Section 1: There will be no dues for members to join, but a small amount of money will be collected for special events. If so, executive members will mention about it before hands. Members are welcome to donate money.
- Section 2: The Treasurer will be in charge of financial affairs. The Treasurer will allocate and designate funds to appropriate events and needs of the organization. The president will oversee the authoritative responsibilities
- Section 3: Upon dissolution, state money and mandatory students fees revert back to the granting organization. Group fees should be divided as stated in the Constitution and carried out by the dissolving group's members and officers. If the group has dissolved and group fees have not been divided as stated in Constitution by five years from last account activity, monies in the group's 00 account will revert to an account specified for this purpose within UISG. These funds will then be available for distribution through SABAC guidelines in compliance with University of Iowa policy, Article VIII

Article VIII

Amendments

- Section 1: Members will be informed at the meetings, by phone/emails and it will be posted on the KASA website
- Section 2: At least 2/3 of the members present must agree with the amendment before it gets ratified
- Section 3: All amendments or change in the constitution will be submitted to the Student Recognition Board.

Article IX

Ratification

- Section 1: If the executive board is in agreement regarding the constitution it will be ratified

EXHIBIT F

Title: CONSTITUTION OF Students For Life

Preamble: Students For Life at the University of Iowa

Date: January 25, 2013

Article I

Purpose: Students For Life at the University of Iowa will strive to protect the sanctity of human life from conception until natural death. This organization aims to bring the importance of this right into the lives of our fellow students. The function of this organization is to provide representation for members of the student body who hold pro-life views and to be a voice for the voiceless.

Article II

Membership: In no aspect of its programs shall there be any difference in the treatment of persons on the basis of race, national origin, color, creed, religion, sex, age, disability, veteran status, sexual orientation, gender identity, or associational preference, or any other classification which would deprive the person of consideration as an individual. The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons.

- a) We ask that members of this organization hold pro-life beliefs.
- b) Anyone is welcome to be a member of this organization. General elections of the group's members will elect their leaders.
- c) In order to be a part of this organization, please attend a meeting. Anyone who instigates trouble and/or disrespectful debating will be asked to leave.

Article III

Officers and Duties

President: creator(s) of the organization.

Duties: lead meetings of the organization, plan any activities, schedule meeting space, handle any types of disrespect or disturbance, etc.

Vice-President: any member of the population of the organization that wishes to run for election

Duties: chief contact person for members, shall act as the president should the president be absent, etc.

Secretary: any member of the population of the organization that wishes to run for election

Duties: keep minutes for each meeting, collect contact information from all members and give to the VP, assist in the creation of all advertisements and signage, etc.

Treasurer: any member of the population of the organization that wishes to run for election

Duties: manage any and all funds received by the organization

A person may be considered for a position if they place their name for election. Any person seeking election must be voted in with a popular majority of member votes.

Should someone vacate their position before their term is up, a special election will be held.

Should someone need to be removed from office, all other members of the governing body must agree. The other members of the governing body will then ask the members at large to take a vote to remove said person from office.

Article IV

Meetings

- a) Meetings will be held every Tuesday from 3pm to 4pm.
- b) Members will be notified by email, at least 4 days in advance in the event of a special meeting.
- c) A quorum must consist of at least 5 members and at least two members of the governing body.
- d) The president and vice president have the authority to call meetings.

Article V

Elections

- a) Elections will take place once a year, at the beginning of each fall semester.
- b) Members will be notified by email at least four weeks before elections take place.
- c) In any case where all positions are not filled an impromptu election may be held at any meeting in order to vote an official member into said executive position. This will be passed only with 100% votes in agreement of the election.

Article VI

Finances

- a) Yes, dues will be collected. Five dollars from each member will be collected at the beginning of every semester.
- b) The treasurer will be responsible for the handling of all matters relating to money.
- c) Upon dissolution, state money and mandatory student fees revert back to the granting organization.

Group fees should be divided as stated in the Constitution and carried out by the dissolving group's members and officers.

If the group has dissolved and group fees have not been divided as stated in Constitution by five years from last account activity, monies in the group's 00 account will revert to an account specified for this purpose within UISG/ECGPS. These funds will then be available for distribution through SABAC or GPAC guidelines in compliance with University of Iowa policy.

In the event of the group's dissolution, the group fees will be divided at the final meeting. All remaining monies will be returned to the organization of individuals who have provided them.

Article VII

Amendments

An amendment is a formal alteration of any kind. This alteration may take many forms, not only the addition of material but also the removal of excess, invalid, or outdated text.

- a) Voters will be informed of any and all amendments by email.
- b) $\frac{3}{4}$ of the present members must vote in agreement of the amendment, otherwise it will not pass.
- c) All amendments or changes to your Constitution must be submitted to the Student Organization Coordinator for approval.

Article VIII

Ratification

Ratification of this constitution will take place on the first meeting date. Each member will be asked to sign a copy of the constitution and their approval will be kept on file.

EXHIBIT G

AAWD Constitution

CONSTITUTION OF THE AMERICAN ASSOCIATION OF WOMEN DENTISTS

Preamble: Official name of the organization: American Association of Women Dentists (AAWD)

Date: Revised September, 2002

ARTICLE I

Purpose

The purpose of this Association shall be to promote good fellowship and cooperation among its members and to aid in the advancement and recognition of women in dentistry. It will allow the opportunity to further knowledge by providing programs of interest as well as providing a communication link with the faculty, staff, and administration of the College of Dentistry. It will serve as a local student branch of the American Association of Women Dentists.

ARTICLE II

Membership

Section I: In no aspect of its programs shall there be any difference in the treatment of persons because of race, national origin, color, creed, religion, sex, age, disability, veteran status, sexual orientation, gender identity, or associational preference, or any other classification which would deprive the person of consideration as an individual. The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons.

Section II: The membership of this organization shall consist of any dental student, faculty, or staff interested in supporting the above objectives.

Section III: Active membership is dependent upon payment of annual dues.

ARTICLE III

Officers, Elections and Duties

Section I: The officers of this organization shall consist of an executive council containing co-presidents, a secretary, a treasurer (the governing council), and one representative from each dental class: freshman, sophomore, junior, and senior. The senior representative will be a position shared by two people, one serving each semester. The co-presidents shall plan, schedule, and run the meetings, draft correspondence, and organize programs and activities. The secretary shall take minutes at the meetings, copy, post, and/or distribute information to the representatives, and type drafted correspondence. The treasurer shall collect dues, distribute funds, prepare, present, and monitor the budget. The representatives shall distribute and obtain information to and from their respective class.

AAWD Constitution

Section II: The governing council shall be elected by all current members. The governing council shall be elected by ballot in April for the following academic year. Each representative shall be elected by respective classmates who are members. All representatives shall be elected by ballot in the fall and serve for that academic year. Each officer of the executive council shall have one vote.

Section III: Any current member is qualified to hold office. Vacant offices may be filled by volunteering current members.

ARTICLE IV

Advisor

The advisor of this organization will be someone within the College of Dentistry that is willing to spend time as an advisor. Their role will be to advise the chapter on National issues. There is no compensation for this position.

ARTICLE V

Meetings

Meetings will be held at the discretion of the co-presidents, with a recommended minimum of once per month general meeting and twice per month executive council meeting. Meetings will be announced via posters and emails at least one week in advance. Quorum is determined as a simple majority of those persons in attendance at the meeting. Any member of the executive council may call meetings.

ARTICLE VI

Elections

Elections will occur during April of each school year for the following school year. Elections will be announced via posters and email at least one week in advance.

ARTICLE VII

Finances

Section I: Dues are determined by and may be paid directly to the National Organization.

Section II: The treasurer is in charge of financial affairs including, but not limited to, the following: collection of dues, disbursement of funds, and authoritative responsibilities.

Section III: Upon dissolution state money and mandatory students fees revert back to the granting organization.

Group fees should be divided as stated in the constitution and carried out by the dissolving group's members and officers.

AAWD Constitution

If group has dissolved and group fees have not been divided as stated in constitution by 5 years from last account activity monies in group's 00 account will revert to an account specified for this purpose within UISG. These funds will then be available for distribution through SABAC guidelines in compliance with University of Iowa policy.

ARTICLE VIII

Amendments

This constitution may be amended at any meeting by a two-thirds vote of current membership. Eligible members will be notified through their class representatives.

ARTICLE IX

Ratification

Ratification of this Constitution must occur if changes to the Constitution are to be made.

EXHIBIT H

**CONSTITUTION
of
Imam Mahdi Organization
Iowa City, IOWA**

February 10, 2015

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THE CONSTITUTION OF IMAM MAHDI ORGANIZATION

University of Iowa, Iowa City, IA.

BISMILLAH-IR-RAHMAN-IR-RAHIM

IN THE NAME OF ALLAH, THE BENEFICENT, THE MERCIFUL

ARTICLE 1. NAME

1.1 The name of the organization is the "Imam Mahdi organization ", hereinafter known as "the organization".

ARTICLE 2. NATURE

- 2.1 In no aspect of its programs shall there be any difference in the treatment of persons on the basis of race, creed, color, religion, national origin, age, sex, pregnancy, disability, genetic information, status as a U.S. veteran, service in the U.S. military, sexual orientation, gender identity, associational preferences, or any other classification which would deprive the person of consideration as an individual. The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons. Eighty percent (80%) of this organization's membership must be composed of UI students.
- 2.2 The source of guidance for the organization is and shall remain the religion of Islam, as described in the Holy Quran and the *Sunnah** of Prophet Muhammad (peace and blessings of God be upon Him and his Family), as explained by the 12 Imams of the family of the Holy Prophet (*AhlulBayt*) and as interpreted by the accepted *Maraja-e-Taqleed* of the Ja'fari Ithna'ashari school of thought, hereinafter referred to as "The Faith".
- 2.3 The organization is and shall remain a non-profit religious organization, in addition, it shall not at any time, at any place, or in any manner, facilitate, provide, perform, indulge in, promote, support or encourage any activity, service or function which is in conflict or inconsistent with The Faith.
- 2.5 Officials of the organization shall be student Members and shall refrain from major sins (*kaba'ir*) and endeavor to avoid minor sins (*saga'ir*).

* All words in italics are defined in the Glossary.

- 2.6 This organization is an inclusive organization, and shall endeavor to invite and encourage the participation of people from different religious backgrounds who are willing to respect The Faith.
- 2.7 Activities of the organization shall be performed in an atmosphere of respect and tolerance towards the religious sensitivities of all participants, with special attention to those of fellow Muslims.

ARTICLE 3. PURPOSE

- 3.1 The organization shall encourage, promote and propagate The Faith and provide facilities for the Members and their families to observe the same.
- 3.2 The organization shall perform functions such as, but not limited to, the following:
- 3.2.1 Facilitate religious education.
- 3.2.2 Disseminate religious knowledge through various means such as: Newsletters, Quranic Studies, Seminars, Discourses and rulings by the accepted Maraja-e-Taqleed.
- 3.2.3 Facilitate the observation of religious activities such as: Daily Congregational (Jama'at) Prayers, Eid Prayers, Eid Reunions, Celebrations, Commemorations and Recommended Prayers.
- 3.3 The organization shall work to strengthen fraternal relations among Muslims, work for universal brotherhood, social justice and peace and cooperate with other organizations having similar aims and objectives.
- 3.4 The organization shall endeavor to perform functions such as, but not limited to, the following:
- 3.4.1 Perform charitable and benevolent community services.
- 3.4.2 Provide Islamic information to individuals, groups or other organizations.
- 3.4.3 Provide an appropriate venue for family activities.

ARTICLE 4. MEMBERSHIP

The organization will guarantee that equal opportunity and equal access to membership, programming facilities, and benefits shall be open to all persons. Membership will be granted in one of two categories: Full Membership or General Membership.

4.1 Qualifications

4.1.1 For Full Membership

Any individual, aged 18 years or above, who believes in and endeavors to practice The Faith, shall qualify to become a Full Member of the organization by fulfilling the following conditions:

4.1.1.1 Be Muslim, Shiea and obtain the recommendation of two Members. The reason behind the recommendation is to be sure that the person who desires to join this organization as a full membership is Muslim, Shiea, who respects the religion rules, and willing to practice the faith.

4.1.1.2 After such a recommendation, attend no fewer than six (6) official meetings (as designated by the Executive Committee, pursuant to Section 6.1.1) over a period of no less than six (6) months.

4.1.2 For General membership

All University of Iowa students are entitled to general membership in the organization, as well as, all faculty, staff, and interested community members.

4.2 Rights of Members

4.2.1 Only Full memberships have the right of vote in official elections (as defined herein) to choose the organization representatives, and recommend others for Full Membership.

4.2.2 Only Full memberships have the right of making ceremonies, hold elected office, create any activity, or contacting any other organizations, university's departments, or any other agencies by using the name of the organization.

4.2.3 All members have the right to serve on official committees and have equal access to the services, activities, and facilities of the organization.

4.3 Duties and Responsibilities of Members

4.3.1 Full membership should stay well acquainted with the organization and not work or act contrary to the tenets, or objectives of the organization, and display good moral character.

4.3.2 Full membership should participate in the organization activities.

4.3.3 All members should support and cooperate in efforts towards the improvement and stability of the organization.

4.4 Membership in the organization may be revoked. Revocation shall be based only on:

4.4.1 Any matter that constitutes a violation of the Nature (Article 2) of the organization by the Member.

4.4.2 Such other matter that constitutes a serious violation of the Purpose (Article 3) of the organization by the Member.

4.4.3 Declaration of the desire to be removed from the membership list.

4.5 The procedure to revoke a Membership must be initiated by two Full Members filing a written report to the Membership Committee. Unless the Membership Committee decides that a hearing is justified, the report and the identity of the reporter shall remain undisclosed. Should the Membership Committee vote to revoke the Member, the Member shall have the right to appeal to the Executive Committee. The Executive Committee, by a majority vote, may vote to override the Membership Committee vote.

ARTICLE 5. ORGANIZATIONAL FRAMEWORK

5.1 Executive Committee

5.1.1 The Executive Committee which consist of five (5) Full Memberships of the organization elected by the Full Membership each year in September) is responsible for the administration of the organization

5.1.2 The President shall be elected directly by the Full Memberships.

5.1.3 A candidate running for the position of Executive Committee Member shall:

5.1.3.1 Be at least 21 years of age.

5.1.3.2 Be a Member of the organization for at least 1 semester, except for the first election.

5.1.3.3 Take oath of office as prescribed in Article 9.

5.1.4 Powers and responsibilities of the Executive Committee.

5.1.4.1 Appoint a Treasurer and a Secretary.

5.1.4.2 Establish and implement policies and guidelines for the efficient operation of the organization.

5.1.4.3 Develop, disseminate, coordinate and implement short-range and long-range plans.

5.1.4.4 Decide and announce timings of official meetings and General Body meetings.

5.1.4.5 Appoint the Religious Committee, Membership Committee and any other committees as needed.

5.1.5 Imam Mahdi organization is required to deposit all receipts in and make disbursements through the Student Organization Business Office, Fraternity Business Services, or Recreational Services. Upon dissolution, state money and mandatory student fees revert back to the granting organization. Inactive organizations will be considered dissolved after five years of no account activity. Revenue generated dollars or “00 funds” must be divided as stated in this Constitution and carried out by our leadership. Our organization’s remaining revenue generated dollars or “00 funds” will be divided or disbursed to (AhlulBayt Islamic Center which is a nonprofit organization in Iowa City, IA). If this organization has dissolved and revenue generated dollars or “00 funds” have not been divided as stated in this Constitution by five years from last account activity, funds in our “00 account” will revert to an account specified for this purpose within student government(s). These funds will then be available for distribution through student government(s) guidelines in accordance with University of Iowa policy.

5.2 Removal or Suspension of an Executive Committee Member

5.2.1 Any Member of the Executive Committee will be removed if:

5.2.1.1 They fail to retain Membership.

5.2.1.2 Loses a recall election called to determine their status on the

Committee. The recall election can be called by a majority vote of the Executive Committee.

5.3 Replacement of Executive Committee Member

5.3.1 Vacancies in the Executive Committee can exist because of any one or more of the following:

5.3.1.1 Insufficient number of Executive Committee Members are elected in the organization's election.

5.3.1.2 Removal of an Executive Committee Member as explained in Section 5.2 of this Article.

5.3.1.3 Loss of one or more Executive Committee Members due to death or resignation.

5.3.2 The remaining Executive Committee Members shall be empowered to select the next runner-up of the organization to fill the vacancy only for the remaining term.

5.3.3 In the event that a runner-up is not available, the vacancy will be filled by an election at a General body meeting to be held within two (2) months of the vacancy.

5.4 President

5.4.1 The President shall be the executive and administrative officer of the organization.

They shall be responsible for the efficient conduct of the affairs of the organization and represent the organization in matters related to its activities.

Without restricting the generality of the aforesaid, the President shall specifically be responsible for:

5.4.1.1 Presiding all meetings of Members of the organization and of the Executive Committee when present

5.4.1.2 The general management and supervision of the affairs and operations of the organization.

5.5 General Body

5.5.1 The General Body shall consist of the Membership.

ARTICLE 6. MEETINGS

6.1 Official Meetings

6.1.1 An Official meeting shall be held at least once a month for the purpose of fulfilling membership requirement, but prefer each week (Saturday)

6.2 General Body Meetings

6.2.1 General Body meetings shall be held at least twice a year. The purpose of these meetings will be to:

6.2.1.1 Review past performances including, but not limited to, Membership records and books of accounts.

6.2.1.2 Discuss current issues and future plans.

6.2.1.3 Transact such other business as may properly be brought before the Executive Committee

6.2.1.4 Hold elections as necessary.

6.2.2 General announcements through a newsletter, telephone recording, or bulletin board, shall be considered sufficient notice for the General Body meeting.

6.3 Executive Committee Meetings

6.3.1 There shall be a regular monthly Executive Committee meeting on the day designated in the Bylaws, with the agenda provided to the Members in advance. Members of the organization are welcome to attend as observers. Minutes of the meeting will be kept and made available to the Members upon request. Any change to the schedule shall be communicated sufficiently in advance to all Members.

6.4 Special Meetings

6.4.1 Special meetings of the Executive Committee with any other committee maybe requested by the Committee at any time.

6.4.2 Special meetings of the organization may be called by the Executive Committee or by two thirds (2/3) of the organization's Members upon at least three (3) and not more than thirty (30) days' notice along with the stated agenda. However, a special meeting called for the purpose of elections, shall require at least two (2) weeks written notice.

6.4.3 Special Executive Committee meetings may be called at any time by any Executive Committee Member upon three (3) days' notice by stating the purpose of the meeting to the other Members of the Executive Committee.

6.5 Quorum

6.5.1 At all the General Body meetings, forty percent (40%) of the Members shall form a quorum. If a quorum is not complete, the meeting shall stand adjourned and postponed to another day at which only twenty-five percent (25%) of the Members shall form a quorum. A simple majority of the Members in attendance (provided a quorum is achieved) shall rule on all matters, unless otherwise stated herein.

6.5.2 At all Executive Committee meetings, the presence of at least four (4) Committee Members shall constitute a quorum. A simple majority shall rule on all matters as described in the Bylaws, unless otherwise stated herein.

ARTICLE 7. AMENDMENT OR REPEAL OF THE CONSTITUTION

7.1 Amendments shall be proposed, in writing to the Executive Committee by one or more Members of the organization. Approval of the amendments shall be authorized by the Executive Committee before ratification by the General Body.

7.2 A quorum of 60% of the total Membership be required for this vote. An 85% vote of the Members present shall constitute ratification to the amendments as described in the Bylaws, except for Article 2 and Article 7 which cannot be changed.

ARTICLE 8. DISSOLUTION

8.1 If the Executive Committee unanimously conclude that the continuation of the organization has become impossible or undesirable due to financial, political, religious or any other reason, the organization shall be dissolved in the following manner:

8.1.1 The situation shall be announced to the General Body.

8.1.2 There shall be no refunds of any contributions or donations whatsoever.

8.1.3 Thirty (30) days after the announcement, if in the opinion of the Executive Committee, there are no promising efforts by the Members of the community to save the organization from dissolution, then the Executive Committee shall start proceedings for dissolving the organization.

8.1.4 The proceedings for dissolving the organization shall consist of:

8.1.4.1 Closing all normal activities.

8.1.4.2 Fulfilling all financial obligations of the organization.

8.1.4.3 Filing all necessary papers with all concerned agencies of the university

**ARTICLE 9. DECLARATION UPON OATH (AFFIDAVIT) FOR
EXECUTIVE COMMITTEE MEMBERS OF THE
ORGANIZATION**

9.1 I, _____ son/daughter of,

_____. While accepting Membership of the
Executive Committee of the organization do swear (as in Section 9.2 of this
Article) in the name of Allah, that I, during my term of office,

9.1.1 Shall fulfill all my duties and responsibilities to the best of my abilities.

9.1.2 Shall consider it my duty to do the utmost to achieve the mission and
successfully fulfill the activities of the organization.

9.1.3 Shall abide by the Constitution, any other Rules, Bylaws, Regulations
and Policies of the organization, and shall help implement the same.

9.1.4 Shall not be absent from any of the Executive Committee meetings and
the organization's programs without reasonable excuse.

9.1.5 Shall frankly present my sincere and correct opinion at the meetings
relating to the organization's activities without any fear, hindrance, or
prejudice (i.e. without affinity, connection, love, enmity, grudge,
approach, plot, competition, rivalry, or ill-will).

9.1.6 Shall guard the organization's rules, regulations, policies and activities;
and if any error or deficiency is noted, I shall try to correct it or get it
corrected.

9.1.7 Shall endeavor to lead an Islamic way of life, according to the Marja-e-
Taqleed.

9.2 Oh Allah! grant me the Divine Guidance, ability and capacity in the name of
Mohammed (S.A.W) and Ale- Mohammed (A.S) to faithfully satisfy this oath only
to please You; and include me among those who lay their foundation on the fear of
Allah and His good pleasure.

9.3 "Ouq se mu Billa-hill Adheem, Wa be Haaz-ul-Quran-el-Kareem, An Akuna
Multazeemen be Qullei Ma-fi-Haaz-ul-Dustoor wa un Uma-resa-hoo be Qullei
Amanah Le Khidma-til Islam wal Muslimeen, Qurbatan Illallah Ta'ala.

Translation:

I swear by the name of the Almighty Allah and the Holy Quran to abide by all
what is in the Constitution during my term of office and to sincerely practice them
to serve Islam, only for the sake of the Almighty Allah.

9.4 Signature of the Executive Committee Member:

Full Name and Designation: _____

Address: _____

ARTICLE 10. ADOPTION OF THE CONSTITUTION

This Constitution, adopted at the Association's General Body meeting on ____ 199_, will
be put into effect immediately and will supersede any previous Constitutions of the
Association. Agreements within the limit and provisions of the previous constitution will
be binding and shall be honored by the organization.

Members of the Constitution Committee:

First & Last Name

GLOSSARY

All terminology defined herein is as understood and interpreted by the Shia Ithna'shari school of thought.

AhlulBayt: Members of the household of the Holy Prophet Muhammed (Peace be upon him and his family)", namely the Holy Prophet, Fatima Al-Zahra, Imam Ali ibn Abi Talib, Imam Hasan ibn Ali, Imam Husein ibn Ali, Imam Ali ibn Husein, Imam Muhammad ibn Ali, Imam Jaffer ibn Muhammed, Imam Musa ibn Jaffer, Imam Ali ibn Musa, Imam Muhammad ibn Ali, Imam Ali ibn Muhammad, Imam Hasan ibn Ali, Imam Mehdi ibn Hasan.

Furu-e-Deen: "Branches of The Faith", namely: Salat (Prayers), Sawm (Fasting), Hajj (Pilgrimage), Zakat (Poor rate), Khums (Tax on savings), Jihad (Holy War), Amr-bil-Marooif (Enjoining the good), Nahi-anil-munkar (Forbidding the Evil), Tawalla (Loving the Friends of the AhlulBayt), Tabarra (Hating the enemies of the AhlulBayt).

Kaba'ir: Major Sins

Marja-e-Taqlaad: A Mujtahid who is A'lam (the most learned)

Mujtahid: A learned person who is male, Shia Ithna'ashari, adult, sane, of legitimate birth, living and just.

Saga'ir: Minor Sins

Sunnah: The actions and sayings of the AhlulBayt.

Usul-e-Deen: "Roots of The Faith", namely: Tawheed (Oneness of Allah), Adl (Justice of Allah), Nubuwaat (Prophethood), Imamat (Vicegerency of the Prophet), Qiyamat (Judgment Day)

AMENDMENTS

EXHIBIT I

CONSTITUTION FOR CHRISTIAN LEGAL SOCIETY STUDENT CHAPTER AT

The University of Iowa College of Law

PREAMBLE The Mission and Vision of the Christian Legal Society

Mission. The Christian Legal Society ("CLS") is an Illinois non-profit corporation with its principal offices in Springfield, Virginia, that exists to inspire, encourage, and equip lawyers and law students, both individually and in community, to proclaim, love and serve Jesus Christ through the study and practice of law, the defense of religious freedom, and the provision of legal assistance to the poor.

Vision. CLS is dedicated to seeking justice with the love of God by following His principles: Helping members faithfully serve Jesus in their professions, relationships, communities, and churches; influencing the legal profession and the law in accordance with His teachings; and serving others as He would serve them.

ARTICLE I. CHAPTER FORMATION

1.1 *Name.* As chartered by the Executive Director of the Christian Legal Society, the name of this organization is the Christian Legal Society Student Chapter at Iowa (the "Chapter").

1.2 *Location.* This Chapter is chartered and established at The University of Iowa College of Law and shall remain chartered at this law school unless lawful action to the contrary is taken by the Executive Director of the Christian Legal Society.

1.3. *Definitions.* When used herein, the terms "CLS" or the "Christian Legal Society" refers to the national membership organization based in Springfield, Virginia, and the term "Chapter" refers to the specific Student Chapter of the Christian Legal Society identified in article 1.1 by name.

ARTICLE II. PURPOSE

The purpose of this Chapter is to develop and maintain a vibrant Christian law student presence on campus, enabling its members, individually and as a group, to love the Lord with their whole beings--hearts, souls, and minds--and to love their neighbors as themselves (Matthew 22:37-40). To that end, the Chapter will:

- Cultivate spiritual growth among its members through communal prayer, fellowship, and worship; learning to share one's faith; and devotional study of the Bible and classic Christian works.
- Show the love of Christ to the campus community and the community at large by proclaiming the gospel in word and in deed, such as through a life of integrity and charitable good works; as Martin Luther put it, "to be as Christ to our neighbor."
- Address the question, "What does it mean to be a Christian in law?" that is, learning to submit every aspect of one's calling in the legal profession to the Lordship of Jesus Christ.

ARTICLE III. STATEMENT OF FAITH

3.1. *Statement of Faith.* All officers of this Chapter must subscribe to the Christian Legal Society Statement of Faith:

Trusting in Jesus Christ as my Savior, I believe in:

- *One God, eternally existent in three persons, Father, Son and Holy Spirit.*
- *God the Father Almighty, Maker of heaven and earth.*
- *The Deity of our Lord, Jesus Christ, God's only Son conceived of the Holy Spirit, born of the virgin Mary; His vicarious death for our sins through which we receive eternal life; His bodily resurrection and personal return.*
- *The presence and power of the Holy Spirit in the work of regeneration.*
- *The Bible as the inspired Word of God.*

All officers must also affirm the CLS Community Life Statement and agree to operate the Chapter under its principles.

ARTICLE IV. MEMBERSHIP

4.1 *Chapter Activities.* All meetings and activities are open to anyone who is part of the law school or university community, including faculty, staff, and students.

4.2. *Chapter Membership.* Any full- or part-time student at The University of Iowa College of Law may be a member of the Chapter if he or she attends at least 50% of the Chapter's regular meetings or activities. Membership in the Chapter does not confer or imply membership in CLS.

4.3 *Eligibility to Vote.* Chapter members are the only persons eligible to vote for Chapter business that is put to a membership vote.

4.4 *Termination.* Any Chapter member who, for any reason, ceases to be a student at the School shall immediately cease to be a member of the Chapter.

4.5 *Membership Requirements.* In no aspect of its programs shall there be any difference in the treatment of persons on the basis of race, creed, color, religion, national origin, age, sex, pregnancy, disability, genetic information, status as a U.S. veteran, service in the U.S. military, sexual orientation, gender identity, associational preferences, or any other classification which would deprive the person of consideration as an individual. The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons. Eighty percent (80%) of this organization's membership must be composed of UI students.

ARTICLE V. OFFICERS

5.1 *General.* A Chapter must consist of at least three officers who are members of CLS and enrolled as students at the School. All Chapter officers shall be members of CLS in good standing. Any Chapter officer who, for any reason, ceases to be a student at the School or whose CLS

membership expires shall immediately cease to be an officer of the Chapter.

5.2 Officer Duties. The following offices and duties are stated for the use of those holding office. The offices of Secretary and Treasurer may be held by the same person.

President. The President shall preside over Chapter business meetings and meetings of the Officers. The President shall operate as the Chapter's representative and primary spokesperson to the law school community, university community, and public-at-large in all matters for which a formal representative is required or appropriate. The President shall also serve as the Chapter's primary contact person with CLS and shall immediately advise the CLS national office of any significant operational or policy conflicts or other problems within the Chapter or between the Chapter and another entity.

The President shall be responsible to select and notify the officer(s) who are to lead the Bible study, prayer, and worship. The President shall also be responsible for inviting any guest speakers. With the consent of the other officers, the President may delegate either or both of these two responsibilities to another officer.

Vice President. The Vice President shall assist the President in the discharge of his or her duties, as the President may direct, and shall perform such other duties as from time to time may be assigned to him or her by the President. In the absence of the President, or in the event of the President's inability or refusal to act, the Vice President shall perform the duties of the President, and when so acting, shall have all of the powers of, and be subject to all of the restrictions upon, the President.

Secretary. The Secretary shall maintain all non-financial records of the Chapter. The Secretary shall be responsible for (a) preparing minutes of all meetings and (b) assisting the President in filing the annual reporting form with CLS.

Treasurer. The Treasurer shall be responsible for maintaining all financial records of the Chapter, including, but not limited to, all records of the payment of funds, deposits and disbursements from the Chapter's funds pursuant to the procedures described in Article VIII.

Other Officers. Any other Chapter Officers appointed pursuant to this Article shall have such duties as are assigned to them by the President.

Each officer is expected to lead Bible studies, prayer, and worship at Chapter meetings as tasked by the President. Although the President is the primary spokesperson for the Chapter, each officer also serves as a spokesperson for the Chapter.

5.3 Bearing Witness of Christ. The Chapter is expected to bear witness of Christ.

5.4 Transition of Authority. To insure the continual wellbeing of the Chapter, outgoing officers shall facilitate the orderly transition of authority by taking adequate time in the winter and spring to train new Chapter leaders. The Chapter shall implement a procedure for the naming of at least three new officers by April 30 of each year. No later than May 1, the outgoing President or Secretary shall inform the CLS office of the names and contact information of the incoming officers.

5.5 Election of Officers. Election of Officers. Officers shall be elected by a majority vote of the Members at the Chapter meeting called for that purpose in the spring semester each year. Any

vacancies shall be filled by a majority vote of the remaining officers.

5.6. CLS Membership of Newly-Elected Officers. In order for a Chapter to retain its affiliation with CLS, each officer, upon election, must join CLS if he or she is not already a member.

5.7 Forcible Removal of an Officer. The removal of a current officer prior to the end of term requires a majority vote of officers or action by the CLS. Such action may be initiated by Chapter members or officers or CLS.

ARTICLE VI. MEETINGS

Chapter meetings shall be held with enough frequency to accomplish the mission and purposes of the Chapter. At least four general meetings shall be held during each school year. The officers, in consultation with the chapter members and any advisor, shall determine the frequency, time and place, and agenda of each meeting and shall insure that adequate notice is given of each meeting.

The President shall be responsible to select and notify before each meeting the officers who are to lead the Bible study, prayer, and worship as well as for inviting any guest speakers.

All students, staff, and faculty are welcome to attend CLS meetings and events, regardless of race, age, disability, color, national origin, religion, race, sex, veteran status or sexual attraction/sexual practices.

ARTICLE VII. FINANCES

The Chapter shall never charge local dues. The Chapter may raise revenues through contributions, fundraising activities, or by applying for funds otherwise available to student groups. If the Chapter chooses to raise revenues, it shall insure that the highest standards of Christian morality and financial integrity are met.

The Christian Legal Society at Iowa is required to deposit all receipts in and make disbursements through the Student Organization Business Office, Fraternity Business Services, or Recreational Services. Upon dissolution, state money and mandatory student fees revert back to the granting organization. Inactive organizations will be considered dissolved after five years of no account activity. Revenue generated dollars or "00 funds" must be divided as stated in this Constitution and carried out by our leadership. Our organization's remaining revenue generated dollars or "00 funds" will be divided or disbursed to **the national organization of The Christian Legal Society**. If this organization has dissolved and revenue generated dollars or "00 funds" have not been divided as stated in this Constitution by five years from last account activity, funds in our "00 account" will revert to an account specified for this purpose within student government(s). These funds will then be available for distribution through student government(s) guidelines in accordance with University of Iowa policy.

At a minimum, the Chapter shall: require the signatures of two officers to use funds; and maintain accurate financial records showing all receipts and expenditures and all assets and liabilities of the Chapter. Upon request, the Chapter's financial records shall be made available to CLS.

ARTICLE VIII. RESTRICTIONS ON ACTIVITIES

The Chapter shall not carry on any activities prohibited by CLS under its bylaws or by Sections 501(c)(3) and 170(c)(2) of the Internal Revenue Code. Without the prior written consent of the CLS

Executive Director, the Chapter shall not: be a voluntary party in any litigation; seek legal counsel from an attorney not on CLS staff; lobby (including the publishing or distribution of statements) or otherwise attempt to influence legislation; or participate or intervene in any political or judicial campaign on behalf of any candidate for office. No part of the net income of the Chapter shall inure to the benefit of its officers or other private persons, except that the Chapter shall be authorized to pay reasonable compensation for services actually rendered and to make payments and distributions in furtherance of its purposes.

ARTICLE IX. AMENDMENTS AND INTERPRETATION

9.1 *Amendments.* The Chapter may amend this Constitution by a 75% member vote, or unanimous vote of the officers; provided, however, that no amendment shall have any force or effect unless it has been approved in writing by the CLS Executive Director. Request for approval of any amendment must be submitted in writing to [REDACTED]

9.2 *Interpretation.* Any conflict or disagreement among Chapter officers or members as to the meaning or interpretation of this Constitution shall be submitted in writing to the Christian Legal Society, through the Executive Director or Director of Law Student Ministries. The decision of the CLS Executive Director resolving the conflict or disagreement shall be final. In the event of any conflict or inconsistency between this Constitution and the CLS bylaws, the terms and provisions of the CLS Bylaws shall control. The Chapter, on behalf of its officers and members, agrees to submit any conflict with CLS to mediation or arbitration using the services of Peacemaker Ministries.

ARTICLE X. FORCE AND EFFECT OF CONSTITUTION

This Constitution shall take effect when the CLS Executive Director executes an affiliation agreement, accepting this Constitution, and shall remain in effect until terminated in writing by either party or until the Executor Director of CLS determines that the Chapter ceases to meet the qualifications of a CLS student chapter as enumerated in this Constitution and Art. XIII of the CLS Bylaws. If the Chapter Constitution is terminated, the Chapter ceases to exist.

CONSTITUTION ADOPTED ON: Thursday, April 16, 2015

SIGNED:

Chapter Officer and CLS Student Member

Print Name: [REDACTED], President

Chapter Officer and CLS Student Member

Print Name: [REDACTED], Vice President

Chapter Officer and CLS Student Member

Print Name: [REDACTED], Secretary/Treasurer

AFFILIATION PROCESS

To form a student chapter of CLS, at least three officers who are members in good standing of the Christian Legal Society must sign this Constitution, complete the Application for Recognition as a Student Chapter of the Christian Legal Society ("Affiliation Agreement"), and submit the originals of the Constitution and Affiliation Agreement to



The Law Student Ministries Director shall forward copies of the Constitution and Affiliation Agreement to the CLS Executive Director. If the Executive Director accepts the application, he or she shall send a signed acceptance document ("Acceptance") to the Law Student Ministries Director, who shall place the original Acceptance in the Chapter file and promptly forward a copy to the Chapter.

**APPLICATION FOR RECOGNITION AS
A STUDENT CHAPTER OF THE CHRISTIAN LEGAL SOCIETY**

AFFILIATION AGREEMENT

In consideration of the right to be recognized as an affiliated student chapter of the Christian Legal Society ("CLS") and to enjoy all the benefits and privileges arising from that status, applicant, the CLS Student Chapter of The University of Iowa College of Law agrees:

1. To abide by the chapter Constitution and to maintain it without alteration, unless written approval for amendment is obtained from the CLS Executive Director.
2. To accept as binding the decision of the CLS Executive Director in response to any inquiry concerning the meaning or interpretation of the local Constitution.
3. To permit and facilitate the inspection of applicant's records and operations at any time by the Christian Legal Society.
4. To recognize ownership by CLS of the trademarks and service marks CHRISTIAN LEGAL SOCIETY, CLS and a symbol consisting of a cross and scales of justice, and the exclusive right of CLS to control the quality of services offered and materials produced by applicant under these marks. Upon request, to provide CLS with copies of any or all materials carrying the CLS marks.
5. To cease immediately to hold itself out as a CLS student chapter upon demand by CLS or upon termination of this agreement and thereupon to discontinue promptly the use of the CLS marks.
6. To advise CLS of any significant operational or policy conflicts or other problems within the Chapter or between the Chapter and the School.
7. To ensure, early in the school year, that the chapter advisor and student chapter officers read the Student Chapter Manual and familiarize themselves with the contents of the Resource Packet.
8. To make every effort to insure that one or more student chapter officers or members attend the CLS National Conference each year and to assist CLS by raising funds at the local level for this purpose.
9. To respond promptly to all CLS inquiries and, by May 1 of each year, to inform the LSM office of who the incoming officers will be.
10. This agreement shall continue in effect until terminated by either party or until applicant ceases to exist, whichever occurs first. Either party may terminate this agreement at any time by written notice to the other party.

DATE: Thursday, April 16, 2015.

CLS STUDENT CHAPTER of The University of Iowa College of Law

BY:

Chapter Officer and CLS Student Member

Print Name: [REDACTED]

Chapter Officer and CLS Student Member

Print Name: [REDACTED]

Chapter Officer and CLS Student Member

Print Name: [REDACTED]

**ACCEPTANCE OF
CLS STUDENT CHAPTER CONSTITUTION AND AFFILIATION AGREEMENT**

The CLS Student Chapter Constitution and the Application for Recognition as a Student Chapter of CLS (Affiliation Agreement), submitted by the Christian Law Fellowship of The University of Iowa College of Law are hereby accepted. Henceforth, the fellowship is recognized as an official student chapter of the Christian Legal Society, subject to the terms and conditions set forth in the above Constitution and Affiliation Agreement.

FOR THE CHRISTIAN LEGAL SOCIETY:

[REDACTED]
Executive Director, CLS

DATE: _____, 20____

EXHIBIT J

Title: The Constitution of Love Works

Preamble: Love Works

Date: INSERT

Article I

Name: The name of our organization is "Love Works." It is an affiliated student group of Sanctuary Community Church, located at [REDACTED]

Purpose:

Love Works purpose is to foster a safe, inclusive environment for all that is conducive to people experiencing God in real ways. Love Works will be anchored in the Gospel, and will meet every other week on a regular basis for Bible studies, as well as twice a month to volunteer and serve our community. Using Jesus as our model, we seek to advocate for justice in all aspects of society, including but not limited to racial, LGBT, and socioeconomic issues.

Article II

Membership:

Section 1) *In no aspect of its programs shall there be any difference in the treatment of persons on the basis of race, creed, color, religion, national origin, age, sex, pregnancy, disability, genetic information, status as a U.S. veteran, service in the U.S. military, sexual orientation, gender identity, associational preferences, or any other classification which would deprive the person of consideration as an individual. The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons. Eighty percent (80%) of this organization's membership must be composed of UI students.*

Section 2) There will be no limitations as far as the minimum or maximum number of participants within the student organization.

Section 3) Membership of Love Works is open to all students at the University of Iowa.

Article III

Officers and Duties:

There will be 4 executive officer positions within Love Works. In order to be an executive, they must sign and agree to the Mission and Statement of Core Beliefs of Love Works as outlined in article IV. The 4 executive officer positions are as follows:

1) President: The role of the President of Love Works will be to schedule, organize, and lead executive and large group meetings weekly. It is also their responsibility to manage all administrative issues, such as: amending the constitution, overseeing the work of the other executives, making any final decisions regarding the well-being of the student organization, and reaching out to form meaningful relationships with members of the organization. To fulfill their responsibility, they must work closely with the College Pastor, emailing them updates on a

weekly basis, as well as working closely with the other executives of the organization. It is the President's duty to work with the other officers to make sure all administrative work is successfully completed. In order to become President, a candidate should possess strong leadership skills (prior leadership experience is preferred), strong communication skills, and strong ethic to be able to complete all of the required duties as President.

2) Vice President: The primary role of the Vice President will be to organize, plan, and promote two volunteer/ service projects a month. The Vice President must work closely with the rest of the executive board to ensure consensus as to where Love Works is volunteering. The Vice President should be comfortable reaching out to leaders in the community to learn about the different opportunities Love Works has to serve.

3) Secretary: The primary role of the Secretary is to manage our 00 account, as well as work closely with the college Pastor to ensure all finances are going well. The treasurer is also responsible for applying for grants, or funding from the UISG whenever Love Works needs funding. The Secretary is also responsible for keeping track of attendance, and managing the excel spreadsheet of its members.

4) Public Relations Director: The main role of the secretary would be to market Love Works. They should send out emails to members reminding them of upcoming events, post on the Facebook page, and tweet about what is going on within Love Works. Also, during meetings, the public relations director should record minutes. Lastly, the public relations director is responsible for spearheading the student org fairs and promoting the group. Candidates considering the position of secretary should be organized and good communicators.

Article IV

Mission & Statement of Core Beliefs

Mission

To provide a space where people of all backgrounds can come to experience God in real ways and to share the good news of Jesus with not only everyone at the University of Iowa, but also those in our local communities.

Core Beliefs

1. **Jesus-Centered:** Jesus will be at the center of everything we do. His life and teachings provide a model worthy of imitation, and we believe through the life, death, and resurrection of Jesus, we can experience great joy and freedom.
2. **Inclusivity:** We believe that Jesus was the ultimate example of someone who reaches out to the marginalized. We stand in full support of those who are victims of

systemic oppression. We welcome full participation in our organization, regardless of race, gender, sexual orientation, gender identity, or ability, and affirm those in the LGBTQ+ community who have been pushed aside from many other faith communities.

3. Service: Jesus came to serve rather than be served. Thus, we place a high emphasis on volunteering. We will seek to share Christ's love with those in our community in tangible ways.
4. Life together: We believe God instilled in us the desire to be in community with others. We want to do life together, and foster an environment where sharing our fears, our successes and our struggles honestly is normalized and encouraged.

Article V

Meetings

Section 1) Meetings will be held every other week. Meetings will not be held during finals week or on University breaks and holidays.

Section 2) Volunteer opportunities will be throughout the semester, as outlined in the Vice President description under Article III.

Article VI

Elections

Section 1) Elections for the Executive Board will be held once a year during the Spring Semester to elect for the following school year.

Section 2) Eligible voters are those who have attended at least 50% of meetings. This will be documented and verified by Secretary.

Section 3) The winner of the elections shall be the candidate who receives a plurality of votes. Should there be a tie, there shall be a re-vote, considering only those who are tied. Should that not solve things, the executive board shall interview the candidates and come to a consensus of who shall be granted the position.

Section 4) Members will be notified in meeting and by email at least two weeks in advance of any upcoming election.

Article VII

Finances

8.1 General. Love Works may raise revenues through contributions, fundraising activities, or by applying for school funds available to student groups. At a minimum, Love Works shall: maintain its funds in an “00 account” set up and maintained for Love Works by obligations only when there is sufficient funding to honor the obligations; pay all debts in a prompt manner; and maintain accurate financial records showing all receipts and expenditures and all assets and liabilities of Love Works.

8.2 Distribution of Money Upon Love Works Dissolution. Upon Dissolution of Love Works, all state money and mandatory student fees revert back to the granting organization.

8.3 Distribution of All Funds Other Than State Money and Mandatory Student Fees Upon Love Works Dissolution. Upon dissolution of Love Works, all funds other than state money and mandatory student fees should be divided as stated in paragraph 8.4 and carried out by all Love Works’ officers. If Love Works has dissolved and group fees have not been divided as stated in Paragraph 8.4 by 5 years from last account activity, monies in Love Works’ 00 account will revert to an account specified for this purpose within UISG. These funds will then be available for distribution from SABAC guidelines in compliance with University of Iowa policy.

8.4 Methods for Distribution of All Funds Other Than State Money and Mandatory Student Fees Upon Love Works Dissolution. Upon dissolution of Love Works, all funds other than state money and mandatory student fees shall as far as practicable be returned to the granting organization, institution, or individual. Any funds that cannot be returned to their source shall be given to a charity selected by 75% of Love Works members. The University of Iowa or UISG is not responsible for the division of student fees outlined above. Love Works shall submit a copy of minutes which has record that Love Works agrees this is what is to be done with the money, along with filling out the appropriate approval forms, vouchers, and tax information in the Student Organization Business Office.

Article VIII

Amendments

Section 1) In order to amend this document, both a $\frac{3}{4}$ vote from officers and a $\frac{2}{3}$ vote by current members at the desired meeting is required to overturn or create changes to amendments.

Section 2) If an officer or a member wishes to amend this constitution, officers and members should be notified at least a week in advance by reading the proposed change(s) at one meeting to all members, as well as via email.

Article IX

Removal/ Appeals

Section 1) The removal of an executive board member will happen only if an egregious behavior transpires, as determined by the other executive board members. Should the executive board members be in disagreement, it shall be handled by the College Pastor.

Section 2) Should an executive board member feel wrongfully removed, he/she/they have the opportunity to appeal. That person must appeal within a week of being removed, and an appeal

will occur at the next general meeting. Those who are eligible to vote (as outlined in Article VI, section 2) will vote to either confirm the executive board's decision, or reverse the decision. Should there be a tie, the College Pastor will make the final decision.

Article X

Section 1) This Constitution shall take immediate effect upon a majority vote of all officers of the organization. The organization shall have all authority necessary to implement this constitution.

EXHIBIT K

The Constitution of Cru at The University of Iowa

ARTICLE I—NAME

The name of this student group is Cru.

This student group is a student chapter (hereafter Chapter) recognized by Cru, a California nonprofit corporation with its principal offices in Orlando, Florida.

This student group has applied for and been granted Chartered status as a Chapter of Cru. As long as the student group fulfills the mission set for in the Charter, and otherwise remains in compliance with its obligations under the Charter, the student group has the right to use the name and materials of Cru that are designated for the use of Chapters within the Campus Ministry.

ARTICLE II—PURPOSE

The purpose of the Chapter is to build movements of people who are transformed by Jesus Christ. The student-led movement seeks to introduce students to Christ, help them to grow in faith, encourage them to passionately live life in a manner consistent with belief in the God of the Bible, and inspire commitment to advancing the purposes of God in the world.

ARTICLE III—STATEMENT OF BELIEF

The Statement of Belief for this organization can be found at http://www.ccci.org/statement_of_faith.html.

ARTICLE IV—MEMBERSHIP

Section 1.

Membership in this Chapter is open to anyone officially connected to The University of Iowa as students, faculty or staff as well as those from the community, such as alumni and staff members of Cru, as long as 2/3 of active members are currently enrolled undergraduate or graduate students.

Section 2.

In no aspect of its programs shall there be any difference in the treatment of persons on the basis of race, national origin, color, creed, religion, sex, age, disability, veteran status, sexual orientation, gender identity, or associational preference, or any other classification which would deprive the person of consideration as an individual. The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons.

Section 3.

A member may be removed from membership and lose the privileges of membership, including the right to attend meetings and events sponsored by Cru, under the following circumstances:

1. If the individual is causing overall disruption to the group, causing an obvious negative effect on the group as a whole.
2. If the individual poses a danger to other students.
3. If the individual's conduct rises to the level of harassment of another member of the group.

Under such circumstances, two or more members of the leadership team will meet with the individual, share the concerns, and ask him or her to leave the group. The accused member may then request a hearing before the full leadership team. An Officer will then call a special leadership meeting; they will hear from the accused member as well as other witnesses, confer, and make a decision regarding the accused member's membership rights.

ARTICLE V – OFFICERS

Section 1.

The officers of this organization, forming part of the leadership team (described in Art. VI), will serve as liaisons with the University. All officers must exemplify the application of Scriptural life principles, in accordance with the national standards of Cru. The offices of this organization shall be the following:

- A. Primary Principal Rep
- B. Secondary Principal Rep
- C. Spokesperson

Section 2.

Officers are selected from the general membership and must be enrolled students at The University of Iowa. Officers serve as representatives of the Chapter and organization of Cru, and, as members of the leadership team, must subscribe to the Statement of Belief.

They must agree that an important part of such belief is taking action and making decisions that are consistent with and based upon those beliefs. They must acknowledge that being a leader requires one to set an example for others on how to live a holy and Biblically-based life. They must also be committed to advancing the purpose and mission of Cru.

Section 3.

Term of office: An officer shall serve for one year from the start of his term or until his/her successor is appointed.

Section 4.

Officers may be removed from their positions based upon general consensus of the core leadership. Any member of the group may make a complaint against an officer. The leadership team will meet, confer with the Cru staff members for advice and counsel, hear from the accused officer (sometimes in a private one-on-one setting), and make a decision.

Misrepresentation of initial agreement with or a change in an individual's ability to subscribe to the Statement of Belief and the Purpose Statement of this organization shall be grounds for immediate removal of the officer by the leadership team.

ARTICLE VI—LEADERSHIP

Section 1.

The leadership of the Chapter is made up of individuals selected, as set forth below, from the Membership.

Section 2.

All leadership team members and small group leaders must subscribe to the Statement of Belief. They must agree that an important part of such belief is taking action and making decisions that are consistent with and based upon those beliefs. They must acknowledge that being a leader requires one to set an example for others on how to live a holy and Biblically-based life.

They must also be committed to advancing the purpose and mission of Cru.

Section 3.

The leadership of the Chapter will consist of a leadership team, the size of which may vary from year to year based upon the size, needs and desires of the group. The leadership team may consist of both a small group of core student leaders and additional groups of leaders that provide direction for different aspects of the Chapter's purpose.

In addition, small group leaders will head discussion groups or Bible studies in a variety of locations and for various affinity groups on campus.

Organizational details of the leadership team are subject to change without amendment to this constitution. *The University of Iowa* students must constitute at least 2/3 of the leadership team.

Section 4.

The current leadership team selects new leadership each year, usually occurring in the Spring. Individual leaders may also be added to the leadership team throughout the year. All prospective leaders must subscribe to the Statement of Belief and Purpose Statement as stated in Articles II and III.

The staff members of Cru serve an advisory role in the selection process, working with the current leadership team to consider and evaluate recommendations for new leaders. The leadership team will then select individuals, inviting them to take the new leadership roles. The leadership team will be responsible to see that all prospective leaders subscribe to the Statement of Belief and Purpose Statement as stated in Articles II and III.

Section 5.

Leaders may be removed from their positions based upon general consensus of the core leadership. Any member of the group may make a complaint against any leader, including a member of the leadership team. The leadership team will meet, confer with the Cru staff members for advice and counsel, hear from the accused leader (sometimes in a private one-on-one setting), and make a decision.

Misrepresentation of initial agreement with or a change in an individual's ability to subscribe to the Statement of Belief and the Purpose Statement of this organization shall be grounds for immediate removal of the leader by the leadership team.

ARTICLE VII—MEETINGS

Meetings shall be held to further the purposes of the Chapter. The leadership team, in consultation with Cru staff, shall determine the frequency, time and place, and agenda of the various meetings.

Large group meetings typically occur weekly during the school year, breaking when instruction ends and during school vacation periods. Small group meetings (Bible Studies, Discussion Groups) also meet weekly within the same parameters. Other meetings necessary to advance the purposes of the Chapter will be held as occasion warrants.

ARTICLE VIII—ADVISOR

Each year, members of the Leadership team will select a member of the UI faculty to be the Chapter's faculty advisor. The advisor will fill out any forms as required by the University to assist the Chapter in meeting those requirements. The advisor is also welcome to be involved as much or as little as he/she would like, and the Chapter will periodically update him/her on how the Chapter is doing.

ARTICLE VIII—FINANCES

Section 1.

The Chapter may raise revenues through contributions, fundraising activities or by applying for school funds available to student groups. Dues shall not be charged to members for participation. Students, however, may be charged for such services as special social gatherings, retreats and conferences. The Chapter will hold to high standards of financial integrity. A member or several members of the leadership team will be responsible to carefully administer any school funds granted to the Chapter.

Section 2.

Should this Chapter dissolve, any funds raised by and for Cru will revert to the National organization of Cru. As this Chapter does not charge dues, no student fees will need to be returned to the students.

Section 3.

Upon dissolution, state money and mandatory student fees revert back to the granting organization. Group fees should be divided as stated in the Constitution and carried out by the dissolving group's members and officers.

If the group has dissolved and group fees have not been divided as stated in Constitution by five years from last account activity, monies in the group's 00 account will revert to an account

specified for this purpose within UISG/ECGPS. These funds will then be available for distribution through SABAC or GPAC guidelines in compliance with University of Iowa policy.

ARTICLE IX—CONSTITUTIONAL AMENDMENTS

Section 1.

This constitution may be amended by a general consensus of the leadership team.

Section 2.

Articles II and III may not be amended without express written permission of Cru.

Section 3.

All amendments, additions or deletions must be filed with the office of [Center for Student Involvement & Leadership](#) and will become valid at the time of filing.

Created: 03/30/2012

Amended: 03/30/2012

EXHIBIT L

CONSTITUTION OF CAMPUS BIBLE FELLOWSHIP

ARTICLE I... STATEMENT OF NEED:

Recognizing: (1) the genuine interest of students for answers and counseling in the realm of spiritual matters, (2) the desire among Christians on campus for fellowship, prayer, and Bible study (3) that many existing religious organizations on campus fail to provide the link with the local church commanded in the New Testament, this constitutes the need for an on-campus organization such as Campus Bible Fellowship.

ARTICLE II... PURPOSE:

This organization is a fellowship organized by students on various campuses and directed by Baptist leaders of Campus Bible Fellowship to encourage the understanding of the historic Christian faith through Bible, study, discussion, & and counseling. Examples, similar in nature, are the positions and practices of Armed Forces chaplains.

ARTICLE III... PREAMBLE

Believing in the first amendment of the United States Constitution which states: "Congress shall make no law respecting an establishment of religion or prohibiting the free exercise thereof," Campus Bible Fellowship shall not discriminate on the basis of race, creed, color, national origin, religion, disability, age, gender any consideration based on affectional, sexual, or associational preference, or any other classification or sexual orientation in the selection of its members or in its programs unless federal or state laws allow for such exceptions.

ARTICLE IV... NAME

The name of this organization shall be Campus Bible Fellowship at the University of Iowa.

ARTICLE V... MEMBERSHIP

Section A: General Membership

"In no aspect of Campus Bible Fellowship's programs shall there be any difference in the treatment of persons because of race, creed, color, national origin, religion, sex, disability, age, veteran status, sexual orientation, gender identity or associational preference, or any other classification which would deprive the person of consideration as an individual." The organization will guarantee that equal opportunity & access to membership, programming, facilities, and benefits shall be open to all persons.

The membership of this organization shall be those who have been in attendance at six regular meetings.

Section B: Voting Membership

Voting membership of this organization is open to all qualified members under Section A, who bear clear testimony of conversion to Jesus Christ.

Section C: Revoking Membership

Members who have been absent from six consecutive meetings shall be dropped from the membership.

Section D: Quorum

A quorum for a committee or group business meeting shall be a majority of the existing qualified membership.

ARTICLE VI... COMMITTEES

Section A: EXECUTIVE COMMITTEE

This committee shall consist of a President, Vice-President, Secretary- Treasurer (or Secretary and Treasurer), and a Historian. The aforementioned students are required to be in sincere agreement with the Articles of Faith and shall serve as members of the Campus Bible Fellowship Area Liaison Committee.

1. President: The President shall be the official representative of the Campus Bible Fellowship student group on the campus. Duties include presiding over regular meetings and appointing special committees (after consultation with the executive committee).
2. Vice-President: The Vice-President shall act as President in his absence and shall also be in charge of organization activities and promotion.
3. Secretary-Treasurer (or Secretary and Treasurer): The Secretary-Treasurer shall keep a record of the minutes of all regular meetings, all executive meetings, and all special committee meetings. The officer (or officers) shall also be in charge of all organization funds and shall handle all organization correspondence.
4. Historian: The Historian shall be in charge of attendance and membership rolls, keeping a journal-scrapbook of organizational activities (articles, photographs, etc.).

Section B: NOMINATING COMMITTEE

This committee shall consist of the existing executive committee, a Campus Bible Fellowship staff member, and a member of the Campus Bible Fellowship Area Liaison Committee. This committee shall make a list of candidates qualified for election to the Executive Committee. A majority vote is required for election. The term of office shall be one semester. Elections will be held near the end of the preceding semester, at a meeting to be announced two weeks in advance.

Section C: SPECIAL COMMITTEES

Special committees may be appointed when needed, by the President, after consultation with the Executive committee.

Section D: AREA LIAISON COMMITTEE

This committee shall consist of a group of interested Christians designated by area independent Baptist churches who shall assist in the spiritual development of the group.

ARTICLE VII... MEETINGS

Section A: REGULAR MEETINGS

The regular meetings of Campus Bible Fellowship will be held weekly during the academic year at a time & place to be announced.
Meetings are open to all students, faculty, staff, and their spouses.

Section B: SPECIAL MEETINGS

Special meetings of the Executive Committee or the Campus Bible Fellowship student group may be scheduled as deemed necessary by the President, a member of the Campus Bible Fellowship staff, or the Campus Bible Fellowship Area Liaison Committee Chairman, providing the purpose of the meeting is well within the stated objectives indicated in the Purpose and Preamble.

ARTICLE VIII... FINANCES

Section A: Free will offerings will be taken for expenses & projects. (No funds are received from the University). (Per the "Constitutional Guidelines" of the U.I.), "Upon dissolution state money & mandatory student fees revert back to the granting organization. Group fees should be divided as stated in the constitution and carried out by the dissolving group's members and officers.

If a group has dissolved and group fees have not been divided as stated in the constitution by 5 years from the last account monies in group's 00 account will revert to an account specified for this purpose within UISG. These funds will then be available for distribution through SABAC guidelines in compliance with University of Iowa policy"

Section B: There will be no special assessments of dues in the group.

Section C: The ministry of Campus Bible Fellowship is maintained at no expense to the students of the University of Iowa.

ARTICLE IX... ADOPTION

This constitution shall be adopted upon receiving a two-thirds vote of the existing qualified membership.

ARTICLE X... AMENDMENTS

Amendments may be made to this constitution providing the amendments are approved by the Campus Bible Fellowship staff member and the Area Liaison Committee, and subsequently receive a two-thirds vote of the qualified membership. A notice of such vote shall be posted two weeks in advance. By-laws may be added by the same procedure.

ARTICLE XI... APPROVAL

Date Approved by: Sept. 2011

CBF Staff	- _____
CBF National	- _____
CBF Student Group	- _____
U of I Office of Student Affairs	- _____

EXHIBIT M

The Daily Iowan



> News

DI Editor - Mar 2, 2017

Finding a home in faith



By Naomi Hofferber

naomi-hofferber@uiowa.edu

For some Christian LGBTQ individuals on campus, finding a ministry that is fully accepting can be a long and painful process.

University of Iowa sophomore Marcus Miller has seen the effects that this conflict between ideology and identity can have.

“When I was a freshman here at Iowa last year — before I was fully accepting of myself and accepting of my identity — I was still very much involved with Christian organizations,” Miller said. “Those organizations were where all my friends were, where my support system was, and as I continued to try to figure things out on my own and figure out my identities, I think things got really tough

for me, because it came increasingly clear that if I were to be proud of my identity of being gay, that would not be OK.”

Miller applied for two different leadership positions with Business Leaders in Christ and 24/7 and was officially offered a position with the first group, and 24/7 had allegedly implied to Miller he would get a position. After revealing to them that he was gay, both offers were rescinded.

In response, Business Leaders in Christ declined to give a statement to *The Daily Iowan*, and 24/7 released the statement, “24/7 welcomes all members of the university community to its meetings and is confident that the complaint is without merit.”

“That really hurt,” Miller said about the withdrawn offers. “I felt rejected, I felt isolated and alone. What once used to be a home for me and a place where all my friends were, where I got all my support, quickly became the place I dreaded the most. It was so hard for me to be rejected by the people I thought would accept me. There was a lot of nights where I wouldn’t be able to sleep, there were a lot of nights where I contemplated suicide. I felt stuck between two different worlds.”

Miller said he felt conflicted between his traditional conservative Christian community and the LGBTQ community. He said he hadn’t fully accepted himself and he wasn’t sure he could be understood with his intersectionality of faith and sexuality.

“It was definitely the hardest time period of my life,” Miller said. “Faith is a very sacred thing; a lot of people cling to it. My faith is still very important to me. I feel like for a lot people, that’s the case, and a lot of people are trying to hold on to their faith, but it makes it extremely difficult when the spaces that they’re in are not accepting and not inclusive.”

Miller said he has placed a formal discrimination complaint with the UI Office of Equal Opportunity and Diversity on Feb. 20. The Office of Equal Opportunity and Diversity told *The Daily Iowan* that it can neither confirm nor deny whether a complaint has been filed.

“The investigation begins when the Office provides written notice to the respondent of the filing of the complaint, the identity of the complainant, and the general allegations of the complaint,” Kyra Seay, the communications coordinator for the Chief Diversity Office said in a statement to *The Daily Iowan*. “The respondent is then interviewed regarding the specifics of the allegations and given an opportunity to respond fully to the allegations. The Office may also interview other persons believed to have factual knowledge relevant to the allegations.”

The written finding of the investigation will typically be issued within 60 days of the complaint being launched.

After being denied leadership roles with other organizations, Miller founded Love Works, an LGBTQ-inclusive campus ministry.



While there are numerous interpretations of Bible scripture, some Christian interpretations classify homosexuality as a sin. This can create challenges for LGBTQ individuals who seek involvement in Christian communities.

“From my understanding, it is God loves all human beings, and He created them in His image,” said Nana Owusu, the president for Campus Bible Fellowship. “But from our understanding, sin has marred that image, and the way that it’s been marred has manifested itself in various different ways. What the Bible clearly states in both the Old and the New Testament is that homosexuality is an abomination. So it is not what He intended that relationship to be like.”

Despite any ideology, LGBTQ individuals are welcome to attend meetings and be involved with Campus Bible Fellowship.

“But according to our stance, if people say that they have belief in Christ, there’s bound to be an understanding that there is sin there, because if they truly do believe this, then they do understand that there is sin, and they are fighting that sin in their life, just as I would have to fight urges of lust, just as I would have to fight anger or hatred,” Owusu said. “You can come to the meetings, we can have that conversation, and we can’t force you to live a life that exemplifies a Christian, but we would like to see that growth in each member.”

To be a leader, individuals must profess a belief in Christ and attend meetings regularly, he said. Leaders are approved by leaders in the affiliated church, Faith Baptist Church.

Campus Christian Fellowship, another Christian organization, holds a similar view on homosexuality.

John Johnson, a campus minister for Campus Christian Fellowship, said the organization’s interpretation of scripture is that homosexuality is a sin, which he said is plainly stated in the Bible.

“I do know that there are people who have different interpretations, but that’s how I read the Bible, so that’s something that we do preach, but we don’t tell people to go away, because it’s one of those things that we believe in preaching and talking about Jesus first, and Jesus is the most important thing,” he said. “So if we prevent people from coming, or make people feel as if they can’t come and be a part of it, how are they ever going to hear about Jesus?”

The ministry has had LGBTQ members in the past, and they are welcome to come to meetings, Johnson said. While choosing leaders for the organization, he said, the group has moral and ethical recommendations and wants leaders to be good role models.

“We ask for them, for their sexual activity, to follow what the Bible prescribes,” Johnson said. “I wouldn’t say that we would ever just outright [reject] any person who wanted to become a leader who was part of that community; we wouldn’t just say, ‘No, you can’t because you’re a part of that community.’ We would talk to them about what

does your life look like, and where are you with all these things, and what do you believe scripture says about these things. It's a lot of just seeing where they're coming from with what scripture says, because we do want to have a unified teaching we're presenting."

The issue becomes complicated, as ideology and religious freedoms could potentially conflict with an anti-discrimination clause that all UI student organizations are required to include in their constitutions, which states, "In no aspect of its programs shall there be any difference in the treatment of persons on the basis of ... sexual orientation, gender identity ... which would deprive the person of consideration as an individual. The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons."

The 2010 Supreme Court case of *Christian Legal Society v. Martinez* dealt with a similar incident regarding campus ministries and the LGBTQ community.

Christian Legal Society required members and officers to sign a statement of faith, in which they agreed to live by certain principles, one of which was the belief that sex was between a man and a woman. It was because the organization restricted based on sexuality that Hastings Law School denied it registered student organization status, as it conflicted with their non-discrimination policy.

Within the case, the society contended that it doesn't exclude individuals based on sexual orientation, but rather on conduct and the belief that the conduct is not wrong; in this case, the group excludes LGBTQ individuals with partners.

The court denied to distinguish between status and conduct in the case, and referenced the 2003 case of *Lawrence v. Texas* in which Justice Anthony Kennedy stated in the opinion of the court, "When homosexual conduct is made criminal by the law of the State, that declaration in and of itself is an invitation to subject homosexual persons to discrimination in both the public and in the private spheres."

In the opinion of the Court in *Christian Legal Society v. Martinez*, Justice Ruth Bader Ginsburg said, "[Christian Legal Society] notes that its 'activities — its Bible studies, speakers, and dinners — are open to all students,' even if attendees are barred from membership and leadership. ... Welcoming all comers as guests or auditors, however, is hardly equivalent to accepting all comers as full-fledged participants."

The court ruled that while it isn't unconstitutional for a student organization to require leaders to hold particular religious beliefs, universities do not have to recognize those organizations.

In 2014, California State University revoked official club status of InterVarsity Christian Fellowship, in accordance with the Supreme Court decision.

Revoking the acknowledgement of an organization does not ban the organization from campus nor does it disband the organization, but organizations could lose university resources and support.

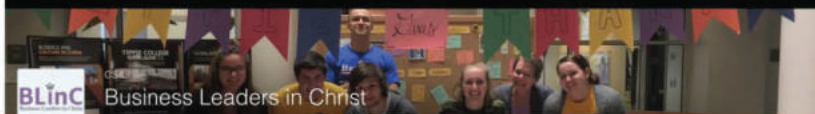
Currently UISG has allocated funds in fiscal 2017 for Business Leaders in Christ and 24/7.\

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EXHIBIT N

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BLInC Business Leaders in Christ

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Welcome to BLInC!

BLInC's primary mission is to create a community of followers of Christ within the Tippie College of business in order to share and gain wisdom on how to practice business that is both Biblical and founded on God's truth. We do this by reading scripture together through devotions, hosting Christian businessmen and women from the community, serving our community together, and spending time with one another. If this sparks your interest, we would love to see you at our next meeting!

As of the Fall 2017 semester, we will be meeting on Mondays from 2:30-3:20pm in C106 in the Pappajohn Business Building. Like us on Facebook for more frequent updates and request to join here as we will add you to our email list. If you have any questions, feel free to email Jake Estell at jacob-estell@uiowa.edu.

Thank you, we look forward to meeting you!

Portal Information

Description
 As seekers of Christ, Business Leaders in Christ is a student organization within the Tippie College of Business meant to help students learn about how to continually keep Christ first in the fast-paced business world. Using the Bible as a guide, through fellowship, speakers, small group discussion, and serving our community, students will network within the College and with business leaders, who walk with Christ on a day-to-day basis.

Category
 Spiritual & Religious

Website
<https://www.facebook.com/TippieBelievers>

When does your organization accept new members?
 Anytime Throughout the Year

Does this organization have a selective membership process?
 No

Membership Process
 The organization accepts anyone at any time throughout the year and will not discriminate against anyone on the basis of race, gender, sexual orientation, religion, disability or any other factor. However, because it is geared towards business students, the target audience for this organization would be for students already admitted into the Tippie College of Business, pre-business students, or students considering business as a major/minor.

Meeting Day
 Monday

Meeting Time
 2:30-3:20 pm

Meeting Location
 C106 Pappajohn Business Building

Organization Facebook Page:
<https://www.facebook.com/TippieBelievers>

Organization Twitter:
<https://twitter.com/TippieBelievers>

PR First Name
 Jacob

PR Last Name
 Estell

Primary Rep. Email
jacob-estell@uiowa.edu

SR First Name
 Brett

SR Last Name
 Eikenberry

Secondary Rep. Email
brett-eikenberry@uiowa.edu

Our organization holds officer (s)elections during:
 The Spring Semester

UI Student Organization Constitution
[Constitution of Business Leaders in Christ.docx](#)

Primary Signer's First Name (Treasurer) - CANNOT BE THE SAME AS THE PRIMARY REPRESENTATIVE!
 Liz

Primary Signer's Last Name (Treasurer) - CANNOT BE THE SAME AS THE PRIMARY REPRESENTATIVE!
 Swanson

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Secondary Signer's First Name
 Brett

Secondary Signer's Last Name
 Eikenberry

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