IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

JANE DOE 1, JANE DOE 2,	§	
JANE DOE 3, JANE DOE 4,	§	
JANE DOE 5, JANE DOE 6,	§	
JANE DOE 7, JANE DOE 8,	§	
JANE DOE 9, AND JANE DOE 10	§	Cause No. 6:16-cv-173-RP-JCM
	§	JURY TRIAL DEMANDED
Plaintiffs,	§	
	§	
vs.	§	
	§	
BAYLOR UNIVERSITY	§	
	§	
Defendant.	§	

PLAINTIFFS' RESPONSE TO DEFENDANT'S POST-HEARING BRIEF ON COMMUNICATIONS WITH THIRD-PARTY ENTITIES AND SETTLEMENT AGREEMENTS

TO THE HONORABLE ROBERT PITMAN:

COME NOW JANE DOES 1-10, Plaintiffs herein, who file this Response to Defendant's Post-Hearing Brief on Communications with Third-Party Entities and Settlement Agreements and in support thereof show:

I.
INTRODUCTION

The Federal Rules of Civil Procedure, *not* Baylor, define the scope of discovery.[1] "[R]elevancy is construed liberally to reach 'any matter that bears on, or that reasonably could lead to other matter that could bear on, any issue that is or may be in the case.'" *Newby v. Enron Corp. (In re*

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[1] Federal Rule of Civil Procedure 26(b)(1) provides:
"Parties may obtain discovery regarding any nonprivileged matter that is relevant to any party's claim or defense and proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit. Information within this scope of discovery need not be admissible in evidence to be discoverable."

Enron Corp. Sec.), 623 F. Supp. 2d 798, 838 (S.D. Tex. 2009)(quoting *Oppenheimer Fund, Inc. v. Sanders*, 437 U.S. 340, 351 (1978)).

Despite this, Baylor continues to impede meaningful relevant discovery, wanting to unilaterally define the scope of discovery and unilaterally define what is relevant and proportional. The Rules make clear that the information sought by Plaintiffs related to information provided by Baylor to third party entities as well as settlement agreements with individuals Baylor publicly claims were responsible for the behavior set forth in the Findings of Fact is discoverable.

II.
ARGUMENTS & AUTHORITIES

A. Plaintiffs are entitled to Baylor's documents and communication with the NCAA.

In its additional briefing requested by the Court, Baylor argues for some sort of absolute privilege shielding these documents based on NCAA confidentiality provisions. Yet, Baylor cites to no case where a Court has recognized such a privilege.

Baylor's cited cases are not on point. In *Berst v. Chipman*, the court ultimately held that some of the requested material was discoverable. 653 P.2d 107, 117 (Kan. 1982)("The cases cited above emphasize that even a strong interest in confidentiality is outweighed when the information sought goes to the very essence, or 'heart,' of the issues in the case. This is the situation presented here."). *Birmingham News Co. v. Muse*, 638 So.2d 853, 854 (Ala. 1994), did not involve a situation where a party was seeking information related to a pending lawsuit; instead, the party in *Birmingham* was seeking documents pursuant to an Alabama statute requiring disclosure of public writings. Finally*, Combined Communications Corp. v. Boger*, 689 F. Supp. 1065, 1066 (W.D. Okla. 1998) did not even concern a discovery issue; rather, the court was confronted with a Motion to Dismiss in a lawsuit filed by news organizations who contended that their First Amendment rights were being violated. None of these cases come close to supporting withholding documents that Plaintiffs have repeatedly demonstrated are relevant to the ultimate issues they must prove in their case.

Baylor has simply cited *no law* that actually supports the position that the confidentiality of the investigation precludes discovery. Courts are clear that "[c]onfidentiality is not a bar to discovery…" *Transp. Alliance Bank, Inc. v. Arrow Trucking Co.*, No. 10-CV-016-GKF-FHM, 2011 U.S. Dist. LEXIS 120942, at *5 (N.D. Okla. Oct. 19, 2011)(rejecting an argument that a confidentiality clause in a settlement agreement barred production of the agreement). *See also Klaassen v. Atkinson*, No. 13-2561-DDC, 2016 U.S. Dist. LEXIS 72598, at *24 (D. Kan. June 2, 2016)("The issue is well-settled that a concern for protecting confidentiality does not equate to privilege, and that information and documents are not shielded from discovery on the sole basis that they are confidential."). Moreover, the mere fact that the NCAA has internal confidentiality provisions in its bylaws does not and cannot shield the materials from discovery. The court in *McNair v. National Collegiate Athletic Assn.*, No. B245475, 2015 Cal. App. LEXIS 112, at *38 (Cal. App. 2d Dist. Feb. 6, 2015) directly addressed this issue in finding that the NCAA was not entitled to a sealing order:

> . . . the NCAA is neither a part of our judicial system nor of our law enforcement apparatus. It is a private, voluntary organization. Unlike the judiciary, the NCAA is more akin to a private employer who investigates misconduct of its employees. When the adequacy of an employer's investigation into an employee is at issue in a lawsuit, the employer must produce its files and disclose the substance of its nonprivileged internal investigation.

Id. (citations omitted). This and the other cases cited by Plaintiffs in its earlier briefing well overcome the few inapposite authorities offered by Baylor.

B. Plaintiffs are entitled to Baylor's documents and communication with the Big XII.

With respect to the Big XII, Baylor once again engages in its "trust us" mentality. Baylor states that all of the documents provided to the Big XII have already been made public. *See* ECF 115, p. 5. Baylor then makes the confusing assertion that "even if produced to Plaintiffs in response to another discovery request," it "will be reproduced to Plaintiffs so that Plaintiffs can identify what has been provided to the Big XII." *Id.* If that is the case, what is Baylor fighting about? All Baylor

needs to do is produce the documents instead of wasting judicial resources.[2]

Although Baylor says everything has been publicly disclosed, in the very next sentence, Baylor states that it "objects to producing documents or communications based on the broader definitions of Issues of Concern set forth in Plaintiffs" discovery requests because non-sexual assault Student Conduct Code violation are not relevant to any claim or defense in this case." *Id.* at 6. Plaintiffs are left to wonder whether this means that there *are* additional responsive documents that exist that Baylor is withholding. Baylor has provided no reasonable basis to withhold this information. With respect to the Issues of Concern, as set forth in Plaintiffs' Post Hearing Brief, Plaintiffs have agreed that academic dishonesty materials should be excluded. However, Plaintiffs have established the relevance of the personal behavior violations relating to alcohol use, sex or other prohibited personal conduct.

This interplay between Issues of Concern/personal behavior violations and discrimination against female students is clearly demonstrated by the e-mail that Baylor has thus far blocked Jones from producing in response to the Buddy Jones Subpoena.[3] In 2009, Regent Buddy Jones, a long-time Board of Regents Chairman, sends an email to Baylor Chief of Staff to the President, Tommy Lou Davis, with a picture of female Baylor students drinking alcohol.[4] Jones demands that this "be dealt with" and that the female students "should be expelled" solely for alcohol related "violations" of Code of Conduct. Jones labels the female students "very bad apples" and "insidious and inbred."

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[2] Being able to easily identify all that was given to the Big XII or other investigating agencies is itself relevant to intent because if Baylor has hidden evidence in an ongoing cover up, it will go to show the extent to which the school's hostile policies toward Title IX are rooted in the school's culture.

[3] The Buddy Jones subpoena issue is discussed in further detail in Section E below, but some of the facts relative to that e-mail are discussed here to show the extent that Plaintiffs should not be asked to rely upon Baylor as to what it produces.

[4] Plaintiffs file a redacted version of this e-mail chain as Exhibit B. Plaintiffs do not possess an un-redacted version to file under seal, thus another reason they seek Mr. Jones' production. Plaintiffs are advised that, although marked Confidential, the presiding state court judge de-designated the redacted version of this email exchange.

Then, Jones instructs Davis to "remove my name and my comments of this email," and he argues that the pictures should result in expulsion.[5] To her apparent credit, Davis writes back that the students were "all seniors . . . celebrating at a private party after one of them got engaged," and there were "no minors in these pictures that I can tell." She invites Jones to send minor's names.

Jones then complains to Davis – reminding her that historically she has been "main ally," "main conspirator," "main compadre" and "my partner in all our efforts," now mad that she is an "apologist" for a 21-year old female student drinking at a friend's engagement party, clearly an effort to coerce a lower level employee. Jones goes on to call a female student (assumedly the one he wants expelled) "the vilest and most despicable of girls," and refers to all the female students pictured as "perverted little tarts."

The above exchange is directly relevant to this case. Here we have a senior Regent calling for direct and purposeful discrimination against female student (i.e., expulsion) using the Code of Conduct based on the pretext of drinking, off-campus, at a non-Baylor related event. Importantly, Jones' attitudes regarding the female students are reflected in his choice of labels - the words "tart" and "perverted" carrying sexual connotations. This email demonstrates the relevance of Baylor's handling of Code of Conduct alcohol related violations as a tool to discriminate against a female students, not just those involving sexual assault victims. The attitude that a female pictured with a drink is therefore sexually promiscuous and consequences are thereby justified goes to the heart of this case – the heightened risk created by a policy and culture of discrimination against female students, an attitude of victim blaming, and an attitude of selective use of the Code of Conduct to

[5] Also, Jones' request to alter records in order to conceal his involvement goes directly to Plaintiffs' request for direct access to Baylor emails and texts through a third-party vendor via ESI process.

discriminate against female students. The exchange bears on micromanagement by Regents (a charge also lodged by Patty Crawford)[6] and a Regent's desire to keep his fingerprints off the discrimination.

C. Plaintiffs are entitled to Baylor's communications with the Texas Rangers.

With respect to the Texas Rangers investigation, Baylor states that it has submitted information *in camera* but did not identify to Plaintiffs what exactly was filed. Baylor does not have the option of denying the existence of documents responsive to Plaintiffs' request. *See In re Actos® (Pioglitazone) Prods. Liab. Litig.*, MDL No. 6:11-md-2299, 2014 U.S. Dist. LEXIS 86101, at *176 (W.D. La. June 23, 2014)("It is not for a party . . . to unilaterally decide to withhold the fact of the very existence of information which falls under a valid discovery request; rather, it is the purview of the Court - upon valid objection made - to determine whether the disclosed information and documents are applicable and relevant.")(emphasis in original). See also *Johnson v. Serenity Transp., Inc.,* No. 15-cv-02004-JSC, 2016 U.S. Dist. LEXIS 149867, at *6 (N.D. Cal. Oct. 28, 2016)("A party cannot unilaterally decide that there has been enough discovery on a given topic.").

As with their arguments concerning the NCAA and Big XII, Baylor has not demonstrated why Plaintiffs are not entitled to these records except an argument that *Baylor* does not believe that the records are relevant. If parties were permitted to determine issues of relevancy, meaningful discovery would never occur.

D. Plaintiffs are entitled to the Settlement Agreements between Baylor and personnel that it publicly claimed responsible for the violations found by the Regents

Baylor has no meaningful basis for preventing discovery of the settlement agreements requested by Plaintiffs. Baylor's argument that the confidentiality provisions in the settlement agreement mandate that they should not be disclosed should be rejected. It is well settled that "Confidentiality clauses in private settlement agreements cannot preclude a court-ordered disclosure

[6] http://www.sho.com/60-minutes-sports/season/2016/episode/11/60-minutes-sports

pursuant to a valid discovery request." *Newby v. Enron Corp. (In re Enron Corp. Sec.)*, 623 F. Supp. 2d 798, 838 (S.D. Tex. 2009)(collecting cases). *See also Allergan, Inc. v. Teva Pharm., USA, Inc.*, No. 2:15-cv-1455-WCB, 2017 U.S. Dist. LEXIS 4543, at *11 (E.D. Tex. Jan. 12, 2017)(compelling discovery of a settlement agreement where a party "made a showing that the settlement agreement . . . is at least *minimally* relevant…")(emphasis added).

With respect to relevance, Baylor once again misconstrues Plaintiffs' arguments regarding the Settlement Agreement. Plaintiffs have been clear regarding the basis for their request. In short, Baylor has spent a year blaming Art Briles, Ian McCaw, Ken Starr and Tom Hill as persons responsible for failures, while admitting the "senior administrators" who committed the Finding's failures remain at Baylor. If they were actually given golden parachutes by Baylor, then this controverts Baylor's claim of their culpability. If Baylor paid out large sums to these officers, the jury could reasonably conclude that these people "took the fall" for the university in an attempt to hide its more extensive failures. In other words, the amounts paid go to the credibility of these witnesses' testimony as to issues in this case. Also, the amounts paid inform the reasonable amount of damages the jury may wish to award these Plaintiffs. The details of these agreements in addition to the amounts are relevant. For example, confidentiality clauses go to show a cover up and the timing of these agreements (and any payouts) in comparison to Baylor's public statements could also be probative. It is worthy of note that the other most recently highlighted wrongdoer by Baylor, former Police Chief Doak (who was under Public Safety Reagan Ramsower), was highly praised by Baylor upon his retirement, a retirement party even announced in the Baylor Lariat newspaper.[7]

E. The Buddy Jones subpoena response demostrates why the requested third party records are essential.

[7] *See* http://www.baylor.edu/alumni/parentsnetwork/index.php?id=870073 and http://baylorlariat.com/2014/09/26/this-weekend-in-the-big-12/retirement-reception-police-chief-jim-doak-truett-great/

Baylor's repeated refrain throughout its brief and during argument to the Court is that there is no need for Plaintiffs to have the documents Baylor submitted to these third party entities because "Plaintiffs can obtain relevant information pertaining to sexual assault directly from Baylor, discovery of the NCAA communications is not necessary or proportional to the needs to the case…" ECF 115, p. 5-6. Baylor, however, conveniently omits the fact that Plaintiffs *have* requested these very records and Baylor has fought tooth and nail at every turn in providing them.

This Court need look no further than Baylor's resistance to the Buddy Jones Subpoena request as evidence of Baylor's repeated shielding of highly relevant information. On October 11, 2016, Plaintiffs served the request for documents upon Jones. Buddy Jones was on the Baylor Board of Regents from 2004 to 2013, as Chairman from June 1, 2011 to May 31, 2012. During Jones tenure on the Board of Regents, five of Plaintiffs were assaulted.

The discovery to Jones was stayed pending the Court's ruling on dismissal, and Jones agreed to answer on April 6, 2017, following that ruling. Jones' response was effectively that he destroyed emails on an ongoing basis, but that there was one responsive document that was subject to a confidentiality agreement with Baylor, and that the document would be produced if Baylor consented. Plaintiffs asked Baylor's counsel for that consent immediately thereafter. *See* Exhibit A. Baylor ignored this request even after conference, aside from claiming the document was not relevant, resulting in Plaintiffs including this matter in Plaintiffs' Motion to Compel Responses to Plaintiffs" First Request for Production of Documents. *See* ECF 94. In open Court on June 16, Baylor offered to show Plaintiffs' counsel the document, as Plaintiffs told the Court that Plaintiffs may already possess it (as multiple news entities also claimed). Baylor showed the document to Plaintiffs, and indeed it was the same document Plaintiffs already possessed - an email exchange between Jones and a Baylor administrator. *See* Exhibit B.

Thereafter, Plaintiffs contacted Jones' counsel to request that Jones' copy of the document be provided to Plaintiffs in response to the discovery requests to 1) authenticate the document; 2) assure that the document Jones claimed was responsive was indeed the one that Baylor showed Plaintiffs in open Court; and (3) obtain an un-redacted version. Baylor still object to this day to Jones' counsel providing the document. The above exhibits the painful process that Plaintiffs must undergo to achieve discovery, and hours of legal time wasted on one document, when all Baylor counsel has to do is allow Jones' attorney to produce the document.

Ignoring for the moment that relevance alone is not a valid discovery objection, Baylor's resistance of this document being produced based on "relevance" grounds alone also exhibits why this Court should not let Baylor pick and choose what it alone believes is relevant to produce. In the case of the Jones document, the relevance is high in terms of Plaintiffs' required proof. As set forth in Section B, the document is direct evidence of discrimination by the highest of Baylor officials against a female student. It is direct evidence of a Baylor official using off-campus lawful use of alcohol as a pretext to trigger Code of Conduct sanctions, and a Baylor nexus between alcohol use, sexual promiscuity and low character. These factors are all present in the case of Plaintiffs. Jones' desire for secrecy also evidencing the propensity of those in leadership at the time of Plaintiffs' assaults to hide their actions, direction and motive.

In its May 26, 2016 Findings of Fact, Baylor's Board of Regents confessed that Baylor failed victims of sexual assault by failing to conduct adequate investigations of reports, by blaming and retaliating against the victims, and by creating a culture and belief that sexual violence "doesn't happen here." In the FOF, the BOR described one peculiar and appalling way young women were silenced by Baylor. According to the BOR, unnamed Baylor administrators used Baylor's policies prohibiting alcohol use and consensual sex to discourage victims from reporting sexual assault and to discourage those who had already made reports from pursuing them further. Some of the

Plaintiffs in this case experienced this first hand when Baylor officials threatened to and did cite them for alcohol policy violations upon learning that they had consumed alcohol on the night they were assaulted. Jurors are entitled to know how this awful culture came to be.

While Baylor President David Garland told the Texas Senate in March of this year that all "senior administrators" responsible for failures are no longer at Baylor, he more or less retracted this statement at his April deposition. *See* ECF 106-1, pp. 120-21. Targeted personnel included athletic personnel Ian McCaw, Tom Hill and Art Briles, plus Ken Starr (who has stated Baylor was trying to fire him for two years prior for unrelated reasons). Now of course, a finger is pointing at Doak.

At some point, Baylor will almost certainly argue either that these were rogue administrators whom Baylor has now fired or that their actions were mere negligence. But the referenced Jones email demonstrates the opposite – that these actions were learned from senior Baylor leaders who taught them that it is appropriate to use alcohol and consensual sex policies as tools to threaten and silence female students. The document at issue shows Buddy Jones, then a powerful Baylor regent and soon to be Chairman, doing exactly what Baylor confessed to having a culture of doing: using the alcohol policy as a pretext to shame, silence and threaten to expel a female student. It shows the Findings of Fact in action. It shows a Regent engaged in micromanagement of a junior administrator and using alcohol policies for apparently pre-textual reasons to shame and punish a female student. It should be recalled that former Title IX Coordinator Patty Crawford left in part because of wholesale lack of support and micromanagement from Regents and senior administrators. Recall also that when she reported sexual assault concerns, Reagan Ramsower, Baylor's most long time and most senior administrator said "those women had mental illness".[8] The soon to be Chairman calls female students "tarts", "inbreds" and "perverted". The top administrator says they're crazy. This reveals a culture coming from the top down. With Garland either deliberately kept in the dark or

[8] http://www.sho.com/60-minutes-sports/season/2016/episode/11/60-minutes-sports

deliberately choosing to remain ignorant, the statements of Jones and Ramsower give a glimpse of who called the shots that created the horrific list of failures and who were the ones who, as Crawford said, were more interested in "protecting the brand … instead of our students".[9] No wonder Baylor wants to hide the internal and third party communications between its officials from a thorough ESI process.

The suggested connection: female student + alcohol = insidious and perverted, is a message that if a young victim wants to complain, they will be pounded with a Code of Conduct for an 1830s world—a Code of Conduct that is selectively enforced when desired to protect the fiction of school without the modern day problems within our society that instead should be confronted and addressed. Baylor's efforts to still prevent Jones from verifying and authenticating the email exchange begs that this Court somehow impart the need for discovery cooperation and compliance..

CONCLUSION & PRAYER

For the foregoing reasons, Plaintiffs request an order to compel.

Respectfully submitted,

/s/ Chad W. Dunn

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[9] *See* http://www.cbsnews.com/news/baylor-university-sexual-assault-scandal-title-ix-coordinator-patty-crawford-resigns/

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing has been filed by ECF and sent to counsel of record via electronic notification on June 30, 2017.

/*s*/Jim Dunnam
JIM DUNNAM

EXHIBIT A

Nicole Ratliff

From:	Jim Dunnam <jimdunnam@dunnamlaw.com>
Sent:	Tuesday, April 11, 2017 5:41 PM
To:	'Ryan Squires'; chad@brazilanddunn.com; Eleeza Johnson; Nicole Ratliff; hmcintush@thompsonhorton.com; lbrown@thompsonhorton.com; Andrea Mehta
Cc:	'Steve McConnico'
Subject:	RE: Buddy Jones subpoena

Ryan

I will inquire of Baylor regarding from email below. Since Ms Brown is on this email perhaps will respond to shortcut things.

In light of your client's lack of response and claim of destruction of emails and other responsive information, we request that you client retain all computer drives, mobile phones and electronic equipment that were used during the responsive time period. Also we request a forensic inspection of email and text accounts and hardware. I am writing to confer prior to filing a motion in that regard to see if you would provide authorization to said account and access to that hardware.

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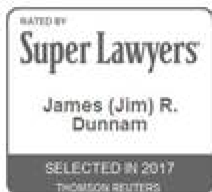

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From: Ryan Squires [mailto:rsquires@scottdoug.com]
Sent: Thursday, April 06, 2017 3:50 PM
To: Jim Dunnam <jimdunnam@dunnamlaw.com>; chad@brazilanddunn.com; 'Eleeza Johnson' <eleezajohnson@dunnamlaw.com>; 'Nicole Heid' <nicole@dunnamlaw.com>; hmcintush@thompsonhorton.com; lbrown@thompsonhorton.com
Cc: Steve McConnico <smcconnico@scottdoug.com>
Subject: Buddy Jones subpoena

All:

I have a document that is responsive to the subpoena served on Buddy Jones, but it is subject to a Confidentiality and Protective Order in a previous case. It was marked "confidential" in that previous case. The Confidentiality and Protective Order contained ongoing obligations that prevent its disclosure absent written permission of the producing party or order of the court. The producing party in that other case was Baylor.

I am interested in your thoughts on how to proceed.

Sincerely,

RYAN SQUIRES
PARTNER
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EXHIBIT B

From: Buddy Jones <buddy@hillcopartners.com>
Sent: Wednesday, October 14, 2009 9:16 PM
To: Davis, Tommye Lou
Subject: RE: pictures of [redacted]

I feel for you having to go through all the health problems your sweet family is having. You must feel as though it is your turn to be passed over for once. Drive safely.

I can't believe that my main ally - my main conspirator - my main compadre - my main cohort - my partner in all our efforts - has become such an apologist for the vilest and most despicible of girls. I am just sick. Those perverted little tarts had better be thanking their lucky stars that my guns are all aimed at a worse group of insidious scoundrels than themselves for the time being. And we are doing well in the BAA catagory, aren't we?

I hope you are keeping our friend in Harris County up to speed on all the comings and goings with the BAA. He started this thing and we shall see to it that the right thing happens for Baylor in his absence. Sunday will be a blockbuster day for us in this regard. Water will begin flowing over the dam on Sunday. The river will begin leaving its banks. Sailors will begin leaving the sinking ship . YOu will see our efforts bear fruit publicly and in earnest. And you will be pleased and righteously happy.

Then, once I am through with the BAA issue, I will turn my attention to the others. It is not you I am disgusted with. It is the system. And (if I have any energy left in me after this BAA issue is settled) we will change it, too. When this stuff can all be sanctioned at a Christian school something needs to be done. Besides, once this alumni outreach is fixed what else will there be to do? I don't want to be bored .

By the way, where is [redacted]s letter of apology?

Know that you are loved. And adored. And appreciated. Please be careful.

Buddy

From: Davis, Tommye Lou [mailto:Tommye_Lou_Davis@baylor.edu]
Sent: Wed 10/14/2009 8:43 PM
To: Buddy Jones
Subject: RE: pictures of [redacted]

Buddy,

These are all seniors (no PNMs) celebrating at a private party after one of them got engaged. This is not a [redacted] function---although the seniors are [redacted]s. There are no minors in these pictures that I can tell. If you want to send me the names of the minor PNMs, please do. I just do not think they are in these pictures.

I am on my way to visit my brother in Little Rock. He is not doing well. I do not teach on Thursdays and Friday is fall break. I willl give you a call when I can.

BU_030582
CONFIDENTIAL

Thanks,

TL

From: Buddy Jones [buddy@hillcopartners.com]
Sent: Wednesday, October 14, 2009 3:31 PM
To: Davis, Tommye Lou
Subject: FW: pictures of

Here are some pictures of and others at a party where alcohol was served to a) underage b) Potential New Members.

I know the Greek system folks would love to have this and more. I am an old Distri ct Attorney and will produce more evidence if I need to . Please don't make me. All of this should be sufficient.

Baylor Panhellenic Rules state that no active members should drink in front of PNM's or invite PNM's to parties where there is alcohol, much less SERVE the PNM's. I believe this constitutes a prima facie case of violations of all three. I would take this one to trial and would win it outright.

I do not even need to tell you the Penal Code violations on serving alcohol to minors.

Almost every single member of the heirarchy (including the President, the Vice-President of Standards and the Vice President of Organization) was present at this party that was thrown by . I believe it was at their place. It was an engagement party I believe.

This is a group of very bad apples. No wonder Standards won't deal with infractions. They are as guilty as the others. It is insidious and inbred. Worse than the BAA.

What more evidence do you need for ? Do not think I have forgotten or am letting up. It is plain to see that alcohol was present and right in front of them. If you tell me I have to prove it was consumed by medical evidence I might go berserk. Get this girl dealt with . Please . She should be expelled.

Where is the letter of apology? Please remove my name and my comments off this email. The pictures will suffice. My comments are meant solely for you .

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