



# **Annual Safety & Security Report**

**Including Clery Act Disclosures of Campus Security Policy and Crime Statistics**

**(Beverly Hills, Ontario and Phoenix campuses)**

**Including Calendar Year 2013, 2014 and 2015 Crime Statistics**

**Published October 1, 2016**

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# Contents

- Introduction and Purpose..... 3
- Completion and Dissemination of the Report..... 3
- Policies for Reporting & Responding to Crimes and Emergencies ..... 4
- Emergency Response and Evacuation ..... 6
- Non-Emergency School Closures or Delays..... 7
- Counseling Services ..... 7
- Facilities Security and Access ..... 7
- Campus Law Enforcement and related Policies ..... 8
- Security Awareness and Crime Prevention Programs.....8
- Alcohol and Illegal Drug Policies..... 9
- VAWA State Law Definitions .....15
- Sexual Harassment/Offense Policy..... 17
- Sex Offender Registration Information ..... 26
- Clery Act Crime Report Statistics ..... 26

## INTRODUCTION AND PURPOSE

To maintain compliance with Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (“Clery Act”), Higher Education Act (“HEA”) requirements, and related statutes and regulations, and in an effort to continuously promote and improve safety and security measures on campus, West Coast Ultrasound Institute (“the Institute” or “WCUI”) collects and publishes information regarding its security policies, services and crime statistics. Once collected, the information is presented annually in this Annual Safety and Security Report (“Report”) to prospective and current students, prospective and current faculty and staff and to the public by the Institute’s Campus Security Survey Administrator. Any questions about this Report should be directed to Deanna Martin, Regional Director of Compliance, who serves as the Campus Security Survey Administrator at (602) 954-3834 or Deanna@wcui.edu.

## COMPLETION AND DISSEMINATION OF THE REPORT

Prior to October 1<sup>st</sup> of each year, the Institute compiles this Report based on crime, arrest and referral information obtained from local law enforcement agencies and as reported to the Institute’s designated campus security authorities (Campus Security Survey Administrator, Campus Director, Director of Student Services, and Title IX Coordinator). The Annual Security Report is published every year by October 1<sup>st</sup> and contains three years of campus crime statistics and campus security policy statements. All crime statistics contained in this Report are for Clery Act reportable crimes occurring on the campus, as defined by 34 C.F.R. § 668.46(a), and on public property, including thoroughfares, streets, sidewalks, and parking facilities, within the campus or immediately adjacent to or accessible from the campus. The Report also includes WCUI’s current policies required pursuant to the current version of 34 C.F.R. § 668.46 and the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (Clery Act), as amended by the Violence Against Women Reauthorization Act of 2013 (VAWA), Pub. Law 113-4.

WCUI administrators prepare this Report which includes reported campus crime, arrest and referral statistics to local law enforcement agencies and designated campus officials. Additionally, WCUI reviews crime reports from local law enforcement agencies whenever published and maintains incident reports at each campus. Both of these sources of information are utilized in the review process regarding the annual report.

WCUI distributes this Report to all enrolled students and current employees via a notice by electronic mail that the current version of the Report has been posted to the Consumer Information page of WCUI’s website; [www.wcui.edu/consumer-info](http://www.wcui.edu/consumer-info), and that a paper copy of the Report will be provided upon request by contacting Pouya Shafiei at the Beverly Hills Campus by phone at (310) 289-5123 or by email at [pouya@wcui.edu](mailto:pouya@wcui.edu), Christian Curiel at the Ontario Campus by phone at (909) 483-3808 or by email at [christian.curiel@wcui.edu](mailto:christian.curiel@wcui.edu), Ryan Ryyth at the Phoenix Campus by phone (602) 954-3834 or by email at [ryan.ryyth@wcui.edu](mailto:ryan.ryyth@wcui.edu). The Admissions Department provides written notice to all prospective students prior to enrollment regarding the availability and location of the Report. The Campus Director or Assistant Campus Director provides all prospective employees with information regarding the availability and location of the Report. All prospective employees may receive a copy of the Report by calling the Regional Director of Compliance, Deanna Martin, (602) 954-3834. A brief description of the Clery Act and the website to access the Annual Security Report are printed in the school catalog. The crime statistics contained in this Report, as reported annually to the U.S. Secretary of Education, can also be viewed by searching WCUI’s name at <http://nces.ed.gov/collegenavigator/>.

# POLICIES FOR REPORTING AND RESPONDING TO CRIMES AND EMERGENCIES

## Reporting Emergencies

“Emergency” includes any dangerous situation involving immediate threat to the health or safety of students, faculty, staff or guests occurring on or near the campus, including fire. Upon observing or involvement in any type of emergency, students, faculty, staff and guests should immediately **call 911**.

If possible, information about the emergency should also be communicated immediately to the Campus Director or other available Institute staff for purposes of expediting the Institute’s activation of its Emergency Response and Evaluation Procedures as set forth below.

## Reporting Crimes

Students, faculty, and staff are strongly encouraged to report all crimes to local law enforcement, dial 9-1-1 (emergencies only). Any suspicious activity or person seen in the parking lots or loitering around vehicles or inside the building should be reported to the local law enforcement agency.

Local Law Enforcement Agency	Local Phone Number	Emergency Number
Beverly Hills Police Department	(310) 550-4951	911
Ontario Police Department	(909) 395-2001	911
Phoenix Police Department	(602) 262-6151	911

In addition, crimes that should be reported to the Campus Director or other Campus Security Authority (CSA) by students, faculty and staff include: criminal homicide, murder and non-negligent manslaughter, manslaughter by negligence, rape, fondling, incest, statutory rape, dating violence, domestic violence, stalking, robbery, aggravated assault, burglary, motor vehicle theft, arson, drug and alcohol violations, and illegal weapons possession. Where there is any question about whether an incident is a crime, a report should be made to the Campus Director or other CSA for assistance in determining the nature of the incident. Witnesses or victims of crimes may report crimes on a confidential basis for inclusion in the Institute’s annual crime statistics reporting.

Upon observing or involvement in any type of crime on campus or on public property, including thoroughfares, streets, sidewalks, and parking facilities, within the campus or immediately adjacent to or accessible from the campus:

- *A student should immediately notify the Campus Director, other CSA, or the nearest available Institute employee. All Institute employees are trained to notify the Campus Security Survey Administrator or Campus Director (or his/her on-site designee) immediately of all crimes reported to them by students.*
- *Faculty and staff should immediately notify the Campus Director or his/her on-site designee, or other CSA.*

### Beverly Hills CSAs

Myra Chason, Campus Director	(310) 289-5123
Mieke Wibowo, Assistant Campus Director	(310) 289-5123
Pouya Shafiei, Facilities Manager	(310) 289-5123
Julio Ortiz, Security Guard	(213) 598-0295

**Ontario CSAs**

Emad Mishriki, Campus Director	(909) 483-3808
Christian Curuiel, Facilities Manager	(909) 483-3808
American One Airtight Security Company, Jim Harper	(888) 772-8765

**Phoenix CSAs**

George Fitzpatrick, Campus Director	(602) 954-3834
Ryan Ryyth, Student Services Coordinator	(602) 954-3834
Fernando Correa, Security Guard	(623) 302-3674

Timely reporting of criminal activity enables WCUI to respond to crime in a timely manner and potentially reduce the recurrence of that crime. Timely manner shall be defined to mean immediately or as immediately as possible under the circumstances. The Institute strongly encourages individuals to report all crimes in an accurate and timely manner to local law enforcement agencies. Upon written request, the Institute will disclose to the alleged victim of a crime of violence (as that term is defined in section 16 of title 18, United States Code), or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by the Institute against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

WCUI works cooperatively with local law enforcement agencies when necessary; however, there are no written memoranda of understanding agreements between West Coast Ultrasound Institute and local law enforcement agencies to investigate alleged crimes. WCUI does, in good faith effort, contact local law enforcement agencies to obtain data on Clery Act crimes that occurred on or near the campus. Not all agencies respond to our requests for data.

**Response to Reports of Crime or Emergency**

Upon receipt of a report of a crime or emergency, the Campus Director will:

- Immediately assess, based on his/her own judgment or after consultation with other the WCUI employees, whether the situation warrants contacting 911 and/or following the emergency response and evacuation procedures contained below.
- Immediately assess, based on his/her own judgment and/or after consultation with other WCUI employees or the local police, whether a “timely warning” to the campus community should be issued pursuant to the Timely Warning policy below.
- With regard to a reported incident that is or may be a sex offense, immediately contact the Institute’s Title IX Coordinator who has authority to evaluate and respond to the reported sex offense in accordance with the Institute’s “Policy Regarding Sexual Harassment and Sex Offenses” contained in this Report.
- For all reported crimes, the Campus Director will contact the Campus Security Survey Administrator within 24 hours of the incident to provide all available and relevant information including the date, time, location, and description of the incident.
- The Campus Director will cooperate with the Campus Security Survey Administrator and/or Title IX Coordinator to investigate and gather any additional information necessary to determine whether the incident must be reported in the crime statistics contained in this Report.

## **Timely Warning of Reported Crime**

In the event that a situation arises, either on or off campus, that, in the judgment of the Campus Director, constitutes an ongoing or continuing threat to students and employees, including with regard to any crime reportable pursuant to the Clery Act, a campus wide “timely warning” will be issued. Depending on the particular circumstances of the crime, especially in all situations that could pose an immediate threat to the students and employees, WCUI will post a warning via one or more of the following means of communication: all-page, local television station or other appropriate local media, email or text message and/or verbal or written notice.

The intent of a timely warning is to provide adequate information necessary to enable the campus community to protect themselves when a significant emergency or dangerous situation occurs. The content of the timely warning will not disclose information that may compromise law enforcement efforts. Anyone with information that warrants a timely warning should report the circumstances immediately to the Campus Director or Assistant Campus Director in person or by phone (contact information listed above).

## **Emergency Response and Evacuation Procedures**

Emergencies are unexpected events which must be dealt with urgently to protect the health and safety of others. In the event the building needs to be evacuated or locked down for any reason, maps of the evaluation route have been posted in each office, common areas and classrooms.

WCUI maintains an Emergency and Safety Information binder that includes emergency response and evacuation procedures and outlines actions staff, faculty, and students must take to protect their mutual health and safety. WCUI will, without delay, and taking into account the safety of the students, faculty and staff, determine the content of the notification and initiate its Emergency Notification System (ENS), unless issuing a notification will, in the professional judgment of the Campus Director or other responsible authority, compromise efforts to assist victims or to contain, respond to or otherwise mitigate the emergency. More information about WCUI’s ENS can be found at: <http://messagesender.org/>. The Campus Director and Assistant Campus Director have the authority and are responsible for overall management and administration of the plan.

WCUI has developed a process to confirm that there is a significant emergency, determine who to notify, determine the content of the notification, and initiate the notification system. The Campus Director or Assistant Campus Director will create the notification and the IT Department along with the Facility Managers will be responsible for notifying students/employees. If deemed necessary, outside the campus community will be notified of the emergency through local law enforcement and/or public health agency. WCUI’s administrative staff will contact parents, guardians, spouses and those listed as emergency contacts by the student via phone if the situation warrants. Other staff and faculty members may be designated as back-ups and to assist with assigned tasks.

Upon confirmation of a significant on campus emergency or dangerous situation involving an immediate threat to the health or safety of students and employees, the Campus Director or Assistant Campus Director will issue an emergency notification and also notify the appropriate local emergency response teams, law enforcement, and individuals on campus who are in harm’s way. Local authorities will determine when and if it is necessary to notify the surrounding community. The Campus Director or Assistant Campus Director will determine what information should be contained in the alert. Campus alerts may be issued, via text messaging, e-mail, classroom announcement, or any combination of methods determined to be necessary. The alerts will identify the appropriate action to take in an effort to have students and employees avoid the confirmed danger and minimize injuries. Depending on the situation, additional alerts will be disseminated as information becomes available.

Evacuations to safe locations will be implemented when necessary and proceed in an organized manner per policy and procedure. All students are required to comply with the plan and the directions given to them by campus safety staff, faculty, or public emergency response teams or law enforcement agencies during actual emergencies and drills for their personal safety. At no time during an actual campus emergency or drill shall students be permitted to leave the campus unless directed to do so.

WCUI tests its emergency response and evacuation procedures at least once annually on an announced or unannounced basis. When tests are conducted, the Institute publicizes its emergency response and evaluation procedures to students, faculty, and staff, including making available a copy of this policy. WCUI maintains documentation of each test exercise including date and time performed and whether it was announced or unannounced.

The plan, including any updates, is reviewed with new students and employees during orientation, in classes at the start of each term, and at a number of faculty meetings during the year. Evacuation routes are identified in each classroom/office and other areas the Campus Director deems necessary.

Emergency response and evacuation drills are conducted and documented, at minimum, bi-annually and all student, faculty, and staff participate and conduct themselves appropriately. Tests may be announced or unannounced at the discretion of the Campus Director. Tests are evaluated for needed improvement. At a later drill any needed improvements will be tested, and if successful, included in the campus procedures. If not successful, different approaches will be tried until acceptable results are achieved.

Students and employees are encouraged to be responsible for their own security and the security of others. Employees and students are expected to follow safe practices while on campus property. Following safe practices will reduce the possibility of accidental emergencies, and increase the effectiveness of the campus response to unforeseen emergencies. Students are required to wear their student ID badges at all times when on campus or participating in school related functions.

The campus community is obligated to report all unsafe activities, potential and real emergencies, and/or criminal activities to the Campus Director or Assistant Campus Director as soon as possible.

## **NON-EMERGENCY SCHOOL CLOSURES OR DELAYS**

Upon decision by the Campus Director, after consultation with other WCUI officials as appropriate, to close a campus or delay opening for any reason, including for weather related reasons; the Institute will notify students and staff using text message, email, social media, TV and/or radio. Notification for closure or delays will be sent separately for morning, evening and weekend schedules.

## **POLICY STATEMENT ADDRESSING COUNSELORS AND COUNSELING SERVICES**

There are no Pastoral or Professional Counselors on campus. Crisis, mental health and victim resource hotline numbers are available from the Student Services department. The Student Services departments at WCUI provide referrals to students for counseling and treatment services through 2-1-1. Students and employees can dial 211 or find referrals at [www.211california.org](http://www.211california.org) or [www.211arizona.org](http://www.211arizona.org). Referral services are also available through the ADP Workforce Now “Life Care” Program for employees. Services available through 2-1-1 and ADP Workforce Now include hotlines, in-patient and out-patient treatment centers and support and counseling services. Services are available 24 hours, 7 days a week. The “Policy Regarding Sexual Harassment and Sexual Offenses” within this Report addresses WCUI’s policies with respect to support services and confidentiality for victims of sexual violence.

## **ACCESS POLICY, SECURITY OF CAMPUS FACILITIES, AND SECURITY CONSIDERATIONS USED IN THE MAINTENANCE OF CAMPUS FACILITIES**

The campus facilities are open during day, evening and weekend business hours (8:30 am to 10:30 pm Monday through Friday and 8:30 am to 6:30 pm on weekends) and are accessible to students, employees, contractors, guests, and invitees. The campus is secured during non-business hours by locking doors and setting alarms and only

accessible by issued key and alarm pass code. Maintenance personnel enter the facilities during the evening or early morning non-business hours by issued key and alarm pass code.

WCUI does not have on or off campus residential facilities or any officially recognized student organizations with noncampus locations. Facilities and landscaping are maintained in a manner that minimizes hazardous conditions. The Campus Director or Assistant Campus Director regularly reviews the campus and reports malfunctioning lights and other unsafe physical conditions to WCUI's Facilities Department for correction.

## **CAMPUS LAW ENFORCEMENT AND RELATED POLICIES**

WCUI does not employ campus police. During the evening hours (6:00 pm to 10:30 pm), while students are on campus, WCUI has contracted with an agency at each campus location to provide an un-armed security guard. Institute employees and the security guard have no authority to arrest or detain any individual. The Institute will assist in notifying appropriate law enforcement authorities if a student requests assistance in contacting police. Students, faculty, and staff are encouraged to accurately and promptly report all crimes and public safety related incidents to the Institute, as set forth in the "Reporting Crimes" section of this Report and to notify local police.

If you are a victim of or witness to a crime and do not want to pursue action through the Institute's procedures or the criminal justice system, the Institute encourages you to consider reporting the incident to the Campus Director or his/her designee, other CSA or the Campus Security Survey Administrator for the limited purpose of permitting the Institute to include the incident in its crime statistic reporting without revealing your identity. With such information, the Institute can keep an accurate record of the number of similar incidents, determine where there is a pattern of crime with regard to a particular location, method, or assailant, and alert the campus community to potential danger. The Institute will make best efforts, to the extent permitted by law, to maintain the privacy of that information and to comply with the Family Educational Rights and Privacy Act of 1974 (FERPA). Police reports are public records under state law, the Institute cannot hold reports of crime obtained from police records in confidence. Policies with respect to victims of sexual violence are contained in the "Policy Regarding Sexual Harassment and Sexual Offenses" section of this Report.

## **SECURITY AWARENESS AND CRIME PREVENTION PROGRAMS**

Safety and security awareness programs are in place for students and employees. The common theme of awareness and crime prevention programs are to encourage students and employees to be aware of their responsibility for their own security and the security of others. During new student and new employee (faculty and staff) orientations, individuals are informed of the Institute's current security and crime prevention policies and practices as well as the protection of personal safety and prevention of crime. Such orientations may include a Power Point presentation and/or review of the policies contained in this Report and the student catalog/employee handbook. The presentations include training required by Title IX of the Higher Education Act regarding preventing and responding to sexual harassment/violence and other topics discussed below in the "Policy Regarding Sexual Harassment and Sexual Offenses" section. WCUI also participates with national organizations to promote awareness such as RAINN (Rape, Abuse, Incest National Network). Educational materials and information to assist victims of a violent crime are available in the student service departments and the Learning Resource Centers.

In addition to the activities completed as discussed in the Emergency Response and Evacuation Procedures section above, instructors are required at the start of every term to discuss emergency evacuation procedures, lockdown procedures and safety policy on the first day of class. Visual emergency exiting layouts are posted at the entrances of all campus rooms.

WCUI abides by Orders of Protection (Restraining Orders). Orders of Protection are issued by a Domestic Relations or a Municipal Court to protect a person or entity, and the general public, in a situation involving alleged assault, domestic violence, harassment, stalking or sexual assault. In the State of California, forms can be obtained online at [www.courts.ca.gov](http://www.courts.ca.gov). A person must complete the DV-100 Domestic Violence Description form and the DV101



form. Both completed forms must be submitted to the court clerk. In Arizona, Orders of Protection are filed with the Superior Court: [www.azleg.state.az.us/ars/13/03602.htm](http://www.azleg.state.az.us/ars/13/03602.htm). WCUI's objective is to provide a safe and secure environment for students, faculty, staff and visitors.

**Procedures:**

- Students, staff and faculty must notify the Campus Director or other CSA if they have an Order of Protection.
- The front desk person must be provided a copy of the Order of Protection with a picture of the suspect.
- The Campus Director, faculty, staff and students that are involved with the Order of Protection and campus security guards will be informed of expected actions and security measures.
- If anyone sees the suspect, call 911 immediately.

In the event of eminent danger or immediate emergency, information is released through the emergency notification system.

## **POLICY ON POSSESSION, USE AND SALE OF ALCOHOLIC BEVERAGES AND ILLEGAL DRUGS**

All of WCUI's property has been designated "drug free" and the Institute is committed to full compliance with the Drug Free Workplace Act and the Drug-Free Schools and Communities Act regulations as contained in 34 C.F.R. Part 86. A copy of WCUI's Drug-Free Schools/Drug-Free Workplace Annual Disclosure containing its policy on possession, use and sale of alcoholic beverages and illegal drugs is contained below. At least on an annual basis, students, faculty and staff are provided with a copy of this policy (See Dissemination of the Report section above). New students, faculty and staff are provided this information during orientation. Annually students and employees are provided this information by means of WCUI's publication of this Report and material posted on campus in the breakroom and common areas.

In accordance with federal regulations, the Institute conducts reviews at least biennially to determine the effectiveness of this policy to ensure consistent enforcement of applicable drug and alcohol related statutes, ordinances, and institutional policies against students and employees found to be in violation. Annual Review reports and supporting documents will be maintained by the Institute and made available upon request.

### **Alcoholic and Drug Prevention Policy**

Students and employees are prohibited from the unlawful manufacture, distribution, dispensing, possession or use of illegal drugs or alcohol anywhere on the Institute's property including grounds, parking areas, anywhere within the building, or while participating in any school sponsored or school related activities.

We believe that chemical dependency, including alcoholism, is a treatable disease which can be addressed and individuals returned to productive, healthy lives. Identification and treatment of chemical dependency also in the early stages will benefit both the Institute and the students/employees. We also recognize that chemical dependency by another member of the immediate family can create stress for the student/employee, which is detrimental to the student's education/the employee's job performance. For this reason, we encourage students and employees to utilize the procedures below that are available in seeking assistance.

The Institute reserves the right to request reasonable cause testing based on observable actions, physical evidence, or on observable changes in established behavior patterns.

The confidential nature of the medical records of employees with chemical dependency, including alcoholism, is preserved in the same manner as all other medical records. A person who suffers from this disease will

receive the same employee benefits and insurance coverage provided for other diseases under our established employee health insurance plans.

The Institute will make every reasonable effort to assist and encourage the employee/student to make the decision to accept the recommended form of treatment for dependency. However, if the student/employee refuses to accept treatment, or continually does not respond to treatment, or the indications of dependency persist, disciplinary action will be taken.

## **Prevention and Treatment**

The Student Services departments at WCUI provide referrals to students for drug and alcohol abuse, prevention and treatment through 2-1-1. Students and employees can dial 211 or find referrals at [www.211california.org](http://www.211california.org) or [www.211arizona.org](http://www.211arizona.org). Referral services are also available through the ADP Workforce Now “Life Care” Program for employees. Services available through 2-1-1 and ADP Workforce Now include hotlines, in-patient and out-patient treatment centers and support and counseling services. Services are available 24 hours, 7 days a week.

## **Alcohol**

The manufacture, distribution, dispensing, or possession of alcohol at WCUI is governed by WCUI's Drug and Alcohol Policy, Arizona and California state law and federal law. Laws regarding the manufacture, distribution, dispensing, and possession of alcohol is controlled by the Arizona and California Department of Alcohol and Beverage Control (ABC). It is unlawful to sell, furnish or provide alcohol to a person under the age of 21. The possession of alcohol by anyone under 21 years of age in a public place or a place open to the public is illegal.

The enforcement of alcohol laws on-campus is the primary responsibility of the Campus Director or his/her designee, other CSA and local law enforcement agencies.

WCUI has been designated a “Drug free” campus and under no circumstances is the possession, sale, manufacture or distribution of alcohol be permitted. Violators are subject to WCUI's disciplinary action, criminal prosecution, fine and imprisonment. The Institute may refer violation of prescribed conduct to appropriate authorities for prosecution in connection with federal and state laws.

## **Health Risks**

Alcohol and substance abuse can cause very serious health and behavioral problems, including short-and long-term effects upon both the body (physiological) and mind (psychological), as well as impairment of learning ability, memory, and performance.

For additional information on health risks of substance abuse, see: <http://www.drugabuse.gov/related-topics/medical-consequences-drug-abuse>. According to this published information; the impact of addiction can be far reaching. Cardiovascular disease, stroke, cancer, HIV/AIDS, hepatitis, and lung disease can all be caused by drug abuse. Some of these effects occur when drugs are used at high doses or after prolonged use, however, some may occur after just one use. According to Drug Abuse: Prevention Strategies for Schools. ERIC Digest 17, drugs produce many effects, including distortion of memory, perceptions, and sensation (U.S. Department of Education, 1986). For example, cocaine and amphetamines give users a false sense of performing at a high level when on the drug. So-called designer drugs, chemical variations of illegal drugs, have caused brain damage and death (Towers, 1987). Frequent drug users skip school or arrive late to class (Wagner, 1984). Regular marijuana users are twice as likely as their classmates to receive low grades (U.S. Department of Education, 1986). Continued marijuana use can cause memory gaps and also lead to decreased physical endurance (Wagner, 1984). Marijuana users often develop sinusitis, pharyngitis, bronchitis, and emphysema within a year of beginning use (Wagner, 1984). Experimenting with drugs, particularly at a young age, often leads to dependence (Towers, 1987). Those dependent on drugs sometimes support their habits by stealing, selling drugs to others, and sexually prostituting themselves.

According to the Center for Disease Control (CDC), excessive alcohol use has immediate effects that increase the risk of many harmful health conditions. These immediate effects are most often the result of binge drinking and include the following:

- Unintentional injuries, including traffic injuries, falls, drownings, burns, and unintentional firearm injuries.
- Violence, including intimate partner violence and child maltreatment. About 35% of victims report that offenders are under the influence of alcohol. Alcohol use is also associated with 2 out of 3 incidents of intimate partner violence. Studies have also shown that alcohol is a leading factor in child maltreatment and neglect cases, and is the most frequent substance abused among these parents.
- Risky sexual behaviors, including unprotected sex, sex with multiple partners, and increased risk of sexual assault. These behaviors can result in unintended pregnancy or sexually transmitted diseases.
- Miscarriage and stillbirth among pregnant women, and a combination of physical and mental birth defects among children that last throughout life.
- Alcohol poisoning, a medical emergency that results from high blood alcohol levels that suppress the central nervous system and can cause loss of consciousness, low blood pressure and body temperature, coma, respiratory depression, or death.

The CDC also indicates that over time, excessive alcohol use can lead to the development of chronic diseases, neurological impairments and social problems. These include but are not limited to:

- Neurological problems, including dementia, stroke and neuropathy.
- Cardiovascular problems, including myocardial infarction, cardiomyopathy, atrial fibrillation and hypertension.
- Psychiatric problems, including depression, anxiety, and suicide.
- Social problems, including unemployment, lost productivity, and family problems.
- Cancer of the mouth, throat, esophagus, liver, colon, and breast. In general, the risk of cancer increases with increasing amounts of alcohol.
- Liver diseases, including:
  - Alcoholic hepatitis.
  - Cirrhosis, which is among the 15 leading causes of all deaths in the United States.
  - Among persons with Hepatitis C virus, worsening of liver function and interference with medications used to treat this condition.
  - Other gastrointestinal problems, including pancreatitis and gastritis.

## **Illegal Drugs**

The possession, sale, manufacture or distribution of any controlled substance is illegal under both state and federal laws. Such laws are strictly enforced by the Campus Director, Campus Security Authority and local law enforcement agencies.

WCUI has been designated a “Drug free” campus and under no circumstances is the possession, sale, manufacture or distribution of illegal drugs be permitted. Violators are subject to WCUI’s disciplinary action, criminal prosecution, fine and imprisonment. The Institute may refer violation of prescribed conduct to appropriate authorities for prosecution in connection with federal and state laws.

## **Legal Sanctions – Laws Governing Alcohol**

The Clery Act requires WCUI to inform students and employees of laws governing alcohol. The following provisions of the federal, state and municipal law serve as the foundation for WCUI’s policy. Note: this list is not a complete summary of relevant laws and ordinances.

Federal law has set 21 as the minimum age to purchase or possess any alcoholic beverage. Specific ordinances regarding violations of alcohol laws, including driving while intoxicated, are available from the California

Department of Alcoholic Beverage Control and Arizona Beverage Control (ABC). The ABC's Act and Related Statutes includes the following laws related to alcohol sanctions:

#### Business & Professions Code Violations

CA code 25658 (a) B&P and AZ code 4-241 Article 3 – Furnish Alcohol to Minor

Definition: Every person who sells, furnishes, gives, or causes to be sold, furnished, or given away, any alcoholic beverage to any person under the age of 21 years is guilty of a misdemeanor.

Penalty: This violation requires a mandatory court appearance and the fine imposed will be at the discretion of the judge.

#### CA code 25661 B&P and AZ code 4-241 Article 3 – Possession of False ID

Definition: Any person under the age of 21 years who presents or offers to any licensee, his or her agent or employee, any written, printed, or photo static evidence of age and identity which is false, fraudulent or not actually his or her own for the purpose of ordering, purchasing, attempting to purchase or otherwise procuring or attempting to procure, the serving of any alcoholic beverage, or who has in his or her possession any false or fraudulent written, printed, or photo static evidence of age and identity, is guilty of a misdemeanor.

Penalty: The violator shall be punished by a fine of at least \$250, no part of which shall be suspended. This violation requires a mandatory court appearance.

#### 25662 B&P and AZ code 4-241 Article 3 – Minor in Possession of Alcohol (MIP)

Definition: Any person under the age of 21 years who has any alcoholic beverage in his or her possession on any street or highway or in any public place or in any place open to the public is guilty of a misdemeanor.

Penalty: A person convicted of a "Minor in Possession" includes a mandatory court appearance, as well as a mandatory suspension of your driver's license for a year, up to \$675 in fines, or proof of completion of the Youth Offender Program.

### **Legal Sanctions – Laws Governing Illegal Drugs**

The Clery Act requires WCUI to inform students and employees of laws governing illegal drugs. The following provisions of the federal, state and municipal law serve as the foundation for WCUI's policy. Note: this list is not a complete summary of relevant laws and ordinances.

The Controlled Substances Act (CSA) places all substances that are regulated under existing federal law into one of five schedules:

#### Schedule I Controlled Substances

Substances in this schedule have a high potential for abuse. Some examples of substances listed in schedule I are: heroin, lysergic acid diethylamide (LSD), marijuana (cannabis), peyote, methaqualone, and 3, 4-methylenedioxymethamphetamine ("ecstasy").

#### Schedule II Controlled Substances

Substances in this schedule have a high potential for abuse that may lead to severe psychological or physical dependence. Examples of single entity schedule II narcotics include morphine and opium. Other schedule II narcotic substances and their common name brand products include: hydromorphone (Dilaudid®), methadone (Dolophine®), meperidine (Demerol®), oxycodone (OxyContin®), and fentanyl (Sublimaze® or Duragesic®). Examples of schedule II stimulants include: amphetamine (Dexedrine®), Adderall®, methamphetamine (Desoxyn®), and methylphenidate (Ritalin®). Other schedule II substances include: cocaine, amobarbital, glutethimide, and pentobarbital.

#### Schedule III Controlled Substances

Substances in this schedule have a potential for abuse less than substances in schedules I or II and abuse may lead to moderate or low physical dependence or high psychological dependence. Examples of

schedule III narcotics include combination products containing less than 15 milligrams of hydrocodone per dosage unit (Vicodin®) and products containing not more than 90 milligrams of codeine per dosage unit (Tylenol with Codeine®). Also included are buprenorphine products (Suboxone®) and (Subutex®) used to treat opioid addiction. Examples of schedule III non-narcotics include benzphetamine (Didrex®), phendimetrazine, ketamine, and anabolic steroids such as oxandrolone (Oxandrin®).

#### Schedule IV Controlled Substances

Substances in this schedule have a low potential for abuse relative to substances in schedule III. An example of a schedule IV narcotic is propoxyphene (Darvon® and Darvocet-N 100®). Other schedule IV substances include: alprazolam (Xanax®), clonazepam (Klonopin®), clorazepate (Tranxene®), diazepam (Valium®), lorazepam (Ativan®), midazolam (Versed®), temazepam (Restoril®), and triazolam (Halcion®).

#### Schedule V Controlled Substances

Substances in this schedule have a low potential for abuse relative to substances listed in schedule IV and consist primarily of preparations containing limited quantities of certain narcotics. These are generally used for antitussive, antidiarrheal, and analgesic purposes. Examples include cough preparations containing not more than 200 milligrams of codeine per 100 milliliters or per 100 grams (Robitussin AC® and Phenergan with Codeine®).

#### Federal Penalties and Sanctions for Illegal Possession of a Controlled Substance:

##### 21 U.S.C. 844(a)

1<sup>st</sup> conviction: Up to 1 year imprisonment and fined at least \$1,000 but not more than \$100,000, or both.

After 1 prior drug conviction: At least 15 days in prison, not to exceed 2 years and fined at least \$2,500 but not more than \$250,000, or both.

After 2 or more prior drug convictions: At least 90 days in prison, not to exceed 3 years and fined at least \$5,000 but not more than \$250,000, or both, if:

- (a) 1<sup>st</sup> conviction and the amount of crack possessed exceeds 5 grams.
- (b) 2<sup>nd</sup> crack conviction and the amount of crack possessed exceeds 3 grams.
- (c) 3<sup>rd</sup> or subsequent crack conviction and the amount of crack possessed exceeds 1 gram.

##### 21 U.S.C. 853(a)(2) and 881(a)(7)

Forfeiture of personal and real property used to possess or to facilitate possession of a controlled substance if that offense is punishable by more than 1 year imprisonment. (See special sentencing provisions re:crack.)

##### 21 U.S.C. 881(a)(4)

Forfeiture of vehicles, boats, aircraft or any other conveyance used to transport or conceal a controlled substance.

##### 21 U.S.C. 844a

Civil fine of up to \$10,000.

##### 21 U.S.C. 853a

Denial of Federal benefits, such as student loans, grants, contracts, and professional and commercial licenses, up to 1 year for first offense, up to 5 years for second and subsequent offences.

##### 18 U.S.C. 922(g)

Ineligible to receive or purchase firearm.

#### Miscellaneous

Revocation of certain Federal licenses and benefits, e.g. pilot licenses, public housing tenancy, etc., are vested within the authorities of individual Federal agencies.

Note: These are only Federal penalties and sanctions. Additional State penalties and sanctions may apply.

### Arizona Legal Sanctions

Possession for personal use of less than 2 pounds of marijuana is a Class 6 felony, punishable by a minimum sentence of 4 months, a maximum sentence of 2 years, and a minimum fine of \$1000 or a fine to exhaust the proceeds of the drug offense. If probation is granted after conviction for this offense, the offender will face a mandatory sentence of 24 hours of community service.

Possession for personal use of 2-4 pounds of marijuana is a Class 5 felony, punishable by a minimum sentence of 6 months, a maximum sentence of 2.5 years, and a minimum fine of \$1000 or a fine to exhaust the proceeds of the drug offense. If probation is granted after conviction for this offense, the offender will face a mandatory sentence of 24 hours of community service.

Possession for personal use of more than 4 pounds of marijuana is a Class 4 felony, punishable by a minimum sentence of 1 year, a maximum sentence of 3.75 years, and a minimum fine of \$1000 or a fine to exhaust the proceeds of the drug offense. If probation is granted after conviction for this offense, the offender will face a mandatory sentence of 24 hours of community service.

Arizona REV. STAT. § 13-3401

Arizona REV. STAT. § 13-3405

Arizona REV. STAT. § 13-702

Arizona REV. STAT. § 13-801

The sale or possessing for sale, of less than 2 pounds of marijuana is a Class 4 felony, punishable by a minimum sentence of 1 year, a maximum sentence of 3.75 years, and a minimum fine of \$1000 or a fine to exhaust the proceeds of the drug offense. If probation is granted after conviction for this offense, the offender will face a mandatory sentence of 240 hours of community service.

The sale, or possessing for sale, of between 2-4 pounds of marijuana is a Class 3 felony, punishable by a minimum sentence of 2 years, a maximum sentence of 8.75 years, and a minimum fine of \$1000 or a fine to exhaust the proceeds of the drug offense.

The sale, or possessing for sale, of more than 4 pounds of marijuana is a Class 2 felony, punishable by a minimum sentence of 2 years, a maximum sentence of 12.5 years, and a minimum fine of \$1000 or a fine to exhaust the proceeds of the drug offense.

Arizona REV. STAT. § 13-3405

Arizona REV. STAT. § 13-702

Arizona REV. STAT. § 13-801

Arizona REV. STAT § 13-821

### California Legal Sanctions

Possession of up to and including 28.5 grams of marijuana is an infraction punishable by a fine of \$100. Possession of more than 28.5 grams is a misdemeanor punishable by up to 6 months imprisonment and/or a fine up to \$500. If the amount possessed is 28.5 grams or less but the person is 18 years of age or older and the possession occurred on school grounds, the person is guilty of a misdemeanor punishable by up to 10 days imprisonment and/or a fine up to \$500. If the offender was younger than 18 years of age, then the offense is a misdemeanor punishable by a fine up to \$250 for the first offense and a fine up to \$500 or commitment to a detention center for up to 10 days.

California Health & Safety Code § 11357

Possession with intent to distribute any amount of marijuana is a felony punishable by 16-36 months imprisonment.

California Health & Safety Code § 11359  
California Penal Code § 1170(h)

Sale or delivery of any amount of marijuana is a felony punishable by 2-4 years imprisonment. However, a gift or mere transportation of 28.5 grams or less of marijuana is a misdemeanor punishable by fine up to \$100. If a person is arrested for this misdemeanor, they shall be released upon presentation of sufficient identification and signing of a written promise to appear in court.

California Health & Safety Code § 11360

Delivery or attempted delivery without compensation of any amount of marijuana by an individual aged 18 years or older to an individual who is 14-17 years old is a felony punishable by 3-5 years imprisonment. Delivery or attempted delivery without compensation of any amount of marijuana by an individual aged 18 years or older to an individual who is under the age of 14 is a felony punishable by 3-7 years imprisonment. Sale or attempted sale of any amount of marijuana by an individual aged 18 years or older to an individual under 18 years of age is a felony punishable by 3-7 years imprisonment.

California Health & Safety Code § 11361

## **WCUI Sanctions**

WCUI will impose disciplinary sanctions on students and employees (consistent with federal, state, and local law ordinances) who violate this policy. These sanctions may include expulsion or termination of employment and referral for prosecution. Conviction of drug and alcohol violations can lead to imprisonment, fines and community service. Convictions may also prevent individuals from entering many fields of employment and make them ineligible for federal student grants and loans. Many cities have local ordinances which prohibit public consumption of alcohol. The penalties for DUI depend on factors such as prior history, and vary from state to state. Penalties for drugs vary with the type and amount of the drug, and whether other criminal activity occurred with the drug offense.

## **VIOLENCE AGAINST WOMEN ACT (VAWA)**

The Violence Against Women Reauthorization Act of 2013 (VAWA) requires publication of the state law definitions for “dating violence,” “domestic violence,” “sexual assault,” “stalking,” and “consent.”

### **California**

**Dating Violence** – included in the domestic violence definition in California Penal Code § 13700

**Domestic Violence** – California Penal Code §13700

Abuse committed against an adult or a minor who is a spouse, former spouse, cohabitant, former cohabitant, or person with whom the suspect has had a child or is having or has had a dating or engagement relationship. For purposes of this subdivision, "cohabitant" means two unrelated adult persons living together for a substantial period of time, resulting in some permanency of relationship. Factors that may determine whether persons are cohabiting include, but are not limited to, (1) sexual relations between the parties while sharing the same living quarters, (2) sharing of income or expenses, (3) joint use or ownership of property, (4) whether the parties hold themselves out as husband and wife, (5) the continuity of the relationship, and (6) the length of the relationship.

**Sexual Assault** – California does not specifically define “Sexual Assault.”

**Stalking** – California Penal Code § 646.9

(a) Any person who willfully, maliciously, and repeatedly follows or willfully and maliciously harasses another person and who makes a credible threat with the intent to place that person in reasonable fear for his or her safety, or the safety of his or her immediate family is guilty of the crime of stalking, punishable by imprisonment in a county jail for not more than one year, or by a fine of not more than one thousand dollars (\$1,000), or by both that fine and imprisonment, or by imprisonment in the state prison.

**Consent** – California Penal Code § 261.6

Consent shall be defined to mean positive cooperation in act or attitude pursuant to an exercise of free will. The person must act freely and voluntarily and have knowledge of the nature of the act or transaction involved. A current or previous dating or marital relationship shall not be sufficient to constitute consent where consent is at issue in a prosecution under Section 261, 262, 286, 288a, or 289. Nothing in this section shall affect the admissibility of evidence or the burden of proof on the issue of consent.

**Arizona**

**Dating Violence** -is defined within ARS 13-3601 with Domestic Violence.

**Domestic violence**–ARS 13-3601

Any act that is a dangerous crime against an adult or child as defined in section 13-705 or an offense prescribed in section 13-1102, 13-1103, 13-1104, 13-1105, 13-1201, 13-1202, 13-1203, 13-1204, 13-1302, 13-1303, 13-1304, 13-1406, 13-1425, 13-1502, 13-1503, 13-1504, 13-1602 or 13-2810, section 13-2904, subsection A, paragraph 1, 2, 3 or 6, section 13-2910, subsection A, paragraph 8 or 9, section 13-2915, subsection A, paragraph 3 or section 13-2916, 13-2921, 13-2921.01, 13-2923, 13-3019, 13-3601.02 or 13-3623, if any of the following applies:

1. The relationship between the victim and the defendant is one of marriage or former marriage or of persons residing or having resided in the same household.
2. The victim and the defendant have a child in common.
3. The victim or the defendant is pregnant by the other party.
4. The victim is related to the defendant or the defendant's spouse by blood or court order as a parent, grandparent, child, grandchild, brother or sister or by marriage as a parent-in-law, grandparent-in-law, stepparent, step-grandparent, stepchild, step-grandchild, brother-in-law or sister-in-law.
5. The victim is a child who resides or has resided in the same household as the defendant and is related by blood to a former spouse of the defendant or to a person who resides or who has resided in the same household as the defendant.
6. The relationship between the victim and the defendant is currently or was previously a romantic or sexual relationship:
  - (a) The type of relationship.
  - (b) The length of the relationship.
  - (c) The frequency of the interaction between the victim and the defendant.
  - (d) If the relationship has terminated, the length of time since the termination.

**Sexual Assault** – ARS 13-1406

A person commits sexual assault by intentionally or knowingly engaging in sexual intercourse or oral sexual contact with any person without consent of such person.

**Stalking**-ARS 13-2923.

A person commits stalking if the person intentionally or knowingly engages in a course of conduct that is directed toward another person and if that conduct causes the victim to:

1. Suffer emotional distress or reasonably fear that either:



- (a) The victim's property will be damaged or destroyed.
  - (b) Any of the following will be physically injured:
    - (i) The victim.
    - (ii) The victim's family member, domestic animal or livestock.
    - (iii) A person with whom the victim has or has previously had a romantic or sexual relationship.
    - (iv) A person who regularly resides in the victim's household or has resided in the victim's household within the six months before the last conduct occurred.
2. Reasonably fear death or the death of any of the following:
- (a) The victim's family member, domestic animal or livestock.
  - (b) A person with whom the victim has or has previously had a romantic or sexual relationship.
  - (c) A person who regularly resides in the victim's household or has resided in the victim's household within the six months before the last conduct occurred.

### **Consent –ARS 36-551.**

Voluntary informed consent. Consent is voluntary if not given as the result of coercion or undue influence. Consent is informed if the person giving the consent has been informed of and comprehends the nature, purpose, consequences, risks and benefits of the alternatives to the procedure, and has been informed and comprehends that withholding or withdrawal of consent will not prejudice the future provision of care and services to the client. In cases of unusual or hazardous treatment procedures performed pursuant to section 36-561, subsection A, experimental research, organ transplantation and nontherapeutic surgery, consent is informed if, in addition to the foregoing, the person giving the consent has been informed of and comprehends the method to be used in the proposed procedure.

## **POLICY REGARDING SEXUAL HARASSMENT AND SEXUAL OFFENSES**

WCUI is committed to providing a work and school environment free of unlawful harassment, sexual violence or discrimination. In furtherance of this commitment, all students and employees are required to take our mandatory Sexual Harassment and Prevention Training upon starting with the Institute and generally every year thereafter. WCUI prohibits harassment or discrimination based on race, religion, creed, color, national origin, ancestry, sex (including pregnancy, childbirth or related medical conditions), military or veteran status, physical or mental disability, medical condition, marital status, age, sexual orientation, gender, gender identity or expression, genetic information or any other basis protected by the federal, state or local law. Additionally, in accordance with Title IX of the Education Amendments of 1972, WCUI prohibits discrimination based on sex, which includes sexual harassment and sexual violence, and the Institute has jurisdiction over Title IX complaints.

WCUI's anti-harassment policy applies to all persons involved in the operation of the Institute, and prohibits unlawful harassment by any employee of the Institute, as well as students, customers, vendors or anyone who does business with the WCUI. It further extends to prohibit unlawful harassment by or against students. Any employee, student or contract worker who violates this policy will be subject to disciplinary action. To the extent a customer, vendor or other person with whom the Institute does business engages in unlawful harassment or discrimination, the Institute will take appropriate corrective action.

Students, faculty and staff should be aware that discrimination and/or other harassment based on sex, gender identity or sexual orientation is unacceptable. The Institute prohibits dating violence, domestic violence, sexual assault, and stalking as defined below. To fulfill its educational mission, the Institute has designated campus specific Title IX Coordinators (contact information listed in the chart below) as its designated representatives to coordinate the Institute's compliance with Title IX of the Education Amendments of 1972, as amended and the Clery Act.

**Students, faculty or staff who feel that they have been the victim of sex harassment, sex discrimination, sexual violence or other sexual misconduct should contact the Title IX Coordinator at their campus and follow the procedures in this policy.** For grievances other than those related to Title IX, students should follow the procedure outlined in the Campus Complaint Procedures policy located in the student catalog.

As part of WCUI's commitment to providing a harassment-free working and learning environment, this policy shall be disseminated to the Institute community through publications, the WCUI website, new employee orientations, student orientations, and other appropriate channels of communication. The Institute provides training to key staff members to enable the Institute to handle any allegations of sexual harassment or sexual violence promptly and effectively. The Institute will respond quickly to all reports, and will take appropriate action to prevent, to correct, and if necessary, to discipline behavior that violates this policy.

The Institute will include information on crimes of sexual violence in its Clery Act Annual Security Report in a manner that protects the identity of the victim. The Institute's Title IX Coordinator has primary responsibility for receiving, evaluating and investigating sexual misconduct reports and for maintaining accurate Clery Act crime statistics. The Title IX Coordinator is responsible for informing the Campus Security Survey Administrator within 24 hours after receiving a sex offense report for purposes of maintaining accurate Clery Act crime statistics.

## Key Definitions

**Sexual harassment** is defined as unwelcome advances, requests for sexual favors, other verbal or physical sexual conduct, or any other offensive unequal treatment of an employee, student, or group of employees or students that would not occur except for their sex when:

1. The advances, requests or conduct have the effect of interfering with performance of duties or studies or creating an intimidating, hostile, or otherwise offensive work or academic environment.
2. Submission to such advances, requests or conduct is explicitly or implicitly a term or condition of an individual's employment or academic achievement or advancement.
3. Submission to or rejection of such advances, requests or conduct is used as a basis for employment or academic decisions.

Sexual Harassment is a violation of Section 703 of Title VII of the Civil Rights Act of 1964 as amended in 1972, (42 U.S.C. S2000e, et. seq.), and Title IX of the Education Amendments of 1972 (20 U.S.C. 1691, et. seq.) and is punishable under both federal and state laws. Forms of sexual harassment include, but are not limited to, sexist remarks or behavior, constant offensive joking, sexual looks or advances, repeated requests for dates, unwelcome touching, promise of reward for sexual favors. Students, faculty or staff who experience sexual harassment should be encouraged to make it clear to the alleged offender that such behavior is offensive. However, failure to comply with this provision does not defeat the Institute's investigation of the allegation.

**Sexual violence** means physical sexual acts perpetrated against a person's will or where a person is incapable of giving consent. A number of acts fall into the category, including sexual assault or harassment based on sexual orientation, domestic violence, dating violence, and stalking. Alleged sexual violence against another may also constitute a crime resulting in an additional, independent law enforcement investigation falling outside of this Grievance Policy. These acts will not be tolerated at the Institute as such acts are inappropriate and create an environment contrary to the goals and mission of the Institute. Any such acts will be thoroughly investigated and will subject an individual to appropriate disciplinary sanctions and/or possible action by appropriate law enforcement agencies.

**Sexual assault** includes rape, acquaintance rape, fondling, incest, and statutory rape, as well as other forms of nonconsensual sexual activity.

**Domestic violence** means a felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner of the victim, a person with whom the victim shares a child in common, a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, a person similarly situated to a spouse of the victim under domestic or family violence laws of the jurisdiction in which the crime of violence

occurred, or any other person against an adult or youth victim who is protected from that person's act under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

**Dating violence** means a violence act committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim and where the existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the following factors: the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. Dating violence includes, but is not limited to; sexual or physical abuse or threat of such abuse and dating violence does not include acts covered under the definition of domestic violence.

**Stalking** means "engaging in a course of conduct (two or more acts including but not limited to acts in which the stalker directly, indirectly, or through third parties, or by any action, method, device or means, follows, monitors observes, surveils, threatens or communicates to or about a person or interferes with his or her property that is directed at a specific person and would cause a reasonable person to fear for his or her safety or the safety of others or suffer substantial emotional distress. Reasonable persons means a reasonable person under similar circumstances and with similar identities to the victim. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

**Consent** means voluntary agreement to engage in sexual activity by verbal agreement or active and willing participation in sexual activity. Someone who is incapacitated or under the age of consent under state law cannot consent. Past consent does not imply future consent. Silence or an absence of resistance does not imply consent. Consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another. Consent may be withdrawn at any time. Coercion, force, or threat of either invalidates consent.

## **Prohibited Conduct**

This policy strictly prohibits sexual or other unlawful harassment or discrimination as well as sexual violence. Sexual or other unlawful harassment or discrimination includes any verbal, physical or visual conduct based on sex, race, age, national origin, disability or any other legally protected basis if:

- i. submission to such conduct is made either explicitly or implicitly a term or condition of an individual's education or employment;
- ii. submission to or rejection of such conduct by an individual is used as a basis for decisions concerning that individual's education or employment; or
- iii. it creates a hostile or offensive work environment, which means the alleged conduct is sufficiently serious to limit or deny a student's or ability to participate or benefit from the student's education program.

Unlawful harassment or discrimination may include racial epithets, slurs and derogatory remarks, stereotypes, jokes, posters or cartoons based on race, national origin, age, disability, marital status or other legally protected categories.

Sexual harassment is conduct based on sex, whether directed towards a person of the opposite or same sex, and may include explicit sexual propositions, sexual innuendo, suggestive comments, sexually oriented "kidding" or "teasing", practical jokes, jokes about or displays of obscene printed or visual material, questions about sexual fantasies, preferences or history, and physical contact such as patting, pinching, or intentionally brushing against another person's body. Gender-based harassment, including acts of verbal, nonverbal or physical aggression, intimidation, or hostility based on sex or sex-stereotyping are strictly prohibited, even if those acts do not involve conduct of a sexual nature.

## **Victims of Assault/Violence**

If you are a victim of a sexual violence, your first priority should be to get to a place of safety. You should then obtain any necessary medical treatment. Information about the alleged offense should be provided to the Title IX Coordinator as soon as possible. Time is a critical factor for evidence collection and preservation.

WCUI strongly advocates that a victim of sexual assault or violence report the incident to police in a timely manner and, if requested to do by the victim, the Institute will assist the victim in contacting the police. However, the victim is not required to contact the police in order to pursue the Grievance Procedure contained in this policy or for WCUI to conduct an independent investigation under this section.

Filing a police report with the local law enforcement agency will not obligate the victim to prosecute. Filing a police report will:

- Ensure that a victim of sexual assault receives the necessary medical treatment and tests at no expense to the victim;
- Provide the opportunity for collection of evidence helpful in prosecution which cannot be obtained later (ideally a victim of sexual assault should not wash, douche, use the toilet, or change clothing prior to a medical/legal exam); and
- Assure the victim has access to free confidential counseling from counselors specifically trained in the area of sexual assault crisis intervention.

The Title IX Coordinator and has primary responsibility for receiving, evaluating and investigating sexual misconduct reports and for maintaining accurate Clery Act crime statistics. Students, faculty and staff who believe they are the victim of sexual misconduct should report the incident to the Title IX Coordinator. Upon receipt of the report, the Title IX Coordinator has the following responsibilities:

1. Provide the complainant with a copy of this policy, information on the availability of the Institute's investigatory procedures (see Investigatory and Disciplinary procedures below), and information about local victim support resources for victims including existing counseling, health, mental health, victim advocacy, legal assistance and other services available to victims.
2. WCUI does not provide on-campus or off-campus counseling services. However, WCUI can and will refer the victim to a non-related, outside counseling service such as a local rape counseling center. In addition, WCUI offers the Employee Assistance Program for all employees.
3. Provide options to facilitate changes to transportation, working, academic and/or living situations, if requested, while an informal or formal investigation is pending, including the option to issue a no-contact order. The Institute will seek to maintain the confidentiality of the identity of the victim and any accommodations or protective measures provided to the victim, to the extent that maintaining such confidentiality would not impair the ability of the Institute to provide the accommodations or protective measures. These steps will be taken by the Institute regardless of whether the victim chooses to file a formal complaint.
4. Inform the complainant that informal mediation cannot be used by the Institute to resolve sexual violence complaints.
5. Inform the complainant of the right to file a separate criminal complaint for allegations relating to sexual violence and that the Institute can assist the victim in doing so, if requested.
6. For incidents other than allegations of sexual violence, undertake, with permission of or at the request of the complainant, to resolve the conflict informally by informing the individual alleged to have caused the grievance that the complaint has been filed; seek to find out the facts; and, if both parties desire it, arrange a meeting to try to resolve the differences. All individuals who are involved in an investigation

as the accused, accuser or witness have a duty to keep all information confidential to the extent permitted by law. Persons who violate the confidentiality rights of other individuals may be subject to disciplinary action.

In the event that an attempt at informal resolution of the problem is unsuccessful, or if the complainant or the Institute deems that informal resolution is undesirable or not permitted by law, the Title IX Coordinator will stop the informal resolution process and assist the complainant in filing of a formal complaint or self-initiate a formal investigation.

### **Reporting Sexual Offenses - Complaint/Grievance Procedure**

If you believe that you have experienced or witnessed harassment, sexual violence or any type of sexual misconduct, WCUI encourages students and employees to promptly report the incident to the local police and/or the Title IX Coordinator as soon as possible after the incident. A report may be made to either or both the police and the Title IX Coordinator. Do not allow an inappropriate situation to continue by not reporting it, regardless of who is creating the situation. No employee, contract worker, student, vendor or other person who does business with the Institute is exempt from the prohibitions in this policy. Supervisors will refer all harassment complaints to the Title IX Coordinator for student-related complaints and to the Human Resources Department if the complaint involves an employee. In order to facilitate the investigation, your complaint should include details of the incident or incidents, names of the individuals involved and names of any witnesses.

To initiate this procedure, a student, faculty member or staff should direct a written complaint to the Title IX Coordinator that states in detail the nature of the complaint, any relevant dates, and the names of any potential witnesses, and any request for confidentiality. In a situation deemed to be an emergency by the Title IX Coordinator, the Institute will issue a Timely Warning and the individual alleged to have caused the grievance or complaint may be temporarily transferred or put on leave pending the outcome of the case. The Title IX Coordinator need not wait for the conclusion of a criminal investigation or criminal proceeding to begin an investigation where warranted.

All complaints involving a student will be referred to the campus’s Title IX Coordinator. The Title IX Coordinator is listed below and has the responsibility of overseeing all Title IX complaints and identifying and addressing any patterns or systemic problems that arise during the review of such complaints.

#### **Title IX Coordinators**

<b>Title IX Coordinators</b>	<b>Local Phone Number</b>	<b>E-mail Address</b>
Carla Dominguez (Beverly Hills)	(310)289-5123	Carla.Dominguez@wcui.edu
Bryn Logan (Ontario)	(909)483-3808	Bryn.Logan@wcui.edu
Terri Simons (Phoenix)	(602)954-3834	terri.simons@wcui.edu

The Institute ensures that its employees designated to serve as Title IX Coordinators have adequate training on what constitutes sexual harassment, including sexual violence, and that they understand how WCUI’s grievance procedures operate. Because complaints can also be filed with an employee’s supervisor or Human Resources, these employees also receive training on the Institute’s grievance procedures and any other procedures used for investigating reports of sexual harassment or sexual violence.

A report may be made to either or both the police and the Title IX Coordinator. Where there is any question about whether an incident is a sex offense, a report should be made to the Institute for assistance in determining the nature of the incident.

Any student, faculty or staff, or group of same, alleging that an act of sexual harassment or violence has taken place has the right to seek redress of the grievance by means of the formal procedure below. In order to ensure availability of witnesses and fresh memories of the alleged discriminatory event, all grievances or investigations covered by

these formal procedures should be filed as promptly as possible after the alleged discriminatory conduct. While informal resolution of the conflict is always open to the aggrieved party, an attempt at informal resolution is not a prerequisite to filing a formal grievance or to the Institute's obligation to investigate a reported event.

After report of the grievance, the Title IX Coordinator will:

1. Provide the complainant with a copy of this policy and information about local victim support resources. Victims of sexual violence will be provided information about evidence preservation.
2. Provide options to facilitate changes to transportation, working, academic and/or living situations, if requested, while an informal or formal investigation is pending, including the option to issue a no-contact order.
3. Inform the complainant of the right to file a separate criminal complaint for allegations relating to sexual violence and that the Institute can assist the victim in doing so if requested.

The Title IX Coordinator will initiate an investigation within ten days of receipt of the formal grievance to determine whether there is a reasonable basis for taking action. At a minimum, this investigation will consist of interviewing the complainant, the individual alleged to have caused the grievance, and any witnesses to the conflict. Within 30 days, the Title IX Coordinator must recommend one of three actions:

1. Concluding that the complaint is without merit and that no further action is warranted.
2. Recommending efforts to bring about an informal resolution under this policy if warranted and permitted by law. However, in the case of sexual violence allegations, the Institute does not permit parties to utilize an informal resolution procedure.
3. Initiation of a formal grievance hearing to evaluate possible disciplinary action against the individual alleged to have caused the grievance.

Either party, the complainant or the individual alleged to have caused the grievance, may request in writing within ten (10) calendar days after notification by the Institute, a formal hearing if dissatisfied with the conclusion.

### **Requests for Confidentiality**

Reports about sex offenses do not have to be formal signed complaints. The Institute is committed to protecting the confidentiality of victims, and will work closely with individuals who wish to obtain confidential assistance regarding an incident of sexual misconduct and will maintain the privacy of information to the extent permitted or required by law, even if the victim does not specifically request confidentiality. A victim's personally identifying information will not be included in any publically available recordkeeping, including Clery Act reporting and disclosures such as this Annual Security Report. Memoranda describing any formal reprimand or disciplinary action for violating this policy will be placed in a student's permanent academic file and an employee's permanent personnel file. These documents are maintained in a locked filing cabinet that only applicable administrative staff has access to.

In some cases, the Institute may need to disclose some information about a victim to a third party to provide necessary accommodations or protective measures. The Title IX Coordinator and Campus Director will meet to weigh the victim's confidentiality against the impact on the Institute being able to provide these necessary accommodations or protective measures. Should it be deemed necessary, they will determine what information about the victim needs to be disclosed and to whom it needs to be disclosed to. The victim will be notified regarding which

information will be shared, with whom it will be shared and why prior to the Institute sharing the information. The Institute will strive to share as limited information as possible in an effort to protect the victim's identity.

## **Investigation of Reports**

In response to all complaints, the Institute promises prompt and equitable resolution through a reliable and impartial investigation of complaints, including the opportunity for both parties to present witnesses or other evidence. Both the victim and the accused will be afforded equitable rights during the investigative process. The time necessary to conduct an investigation will vary based on complexity but will generally be completed within sixty (60) days of receipt of the complaint. The Institute shall maintain confidentiality for all parties to the extent possible, but absolute confidentiality cannot be guaranteed. In cases where a student does not give consent for an investigation, the Institute will weigh the student's request for confidentiality against the impact on Institute safety to determine whether an investigation must proceed. The Institute may not require a victim to participate in a formal investigation or hearing that it is initiated. Complainants should be aware that in a formal investigation due process generally requires that the identity of the charging party and the substance of the complaint be revealed to the person charged with the alleged harassment.

The preponderance of the evidence standard will apply to investigations, meaning the Institute will evaluate whether it is more likely than not that the alleged conduct occurred. Both parties will receive written notice of the outcome of the complaint.

During the investigation, the Institute will provide interim measures, as necessary, to protect the safety and wellbeing of students and/or employees involved.

To initiate a criminal investigation, reports of sexual violence should be made to "911" or local law enforcement. The criminal process is separate from the Institute's process. To the extent that an employee or contract worker is not satisfied with the Institute's handling of a harassment or discrimination complaint, he or she may also contact the appropriate state or federal enforcement agency for legal relief.

\*Beverly Hills and Ontario Campuses: employees may notify the Department of Fair Employment and Housing by consulting the government agency listings in the telephone book or on-line at [www.dfeh.ca.gov](http://www.dfeh.ca.gov). The Department of Fair Employment and Housing will, in appropriate cases, prepare and investigate complaints of harassment or discrimination; after a hearing, the Fair Employment and Housing Commission may award damages to individuals actually injured as a result of such conduct, as well as other remedies.

## **Hearing Procedure**

A Grievance Committee composed of the Title IX Coordinator and one other senior level management personnel who has received annual training on sexual violence and Title IX investigative procedures and who is appointed by the CEO will be convened to review the Title IX Coordinator's recommendations and to receive any oral or written testimony from the complainant, the individual alleged to have caused the grievance, and any relevant witnesses from both parties and any other relevant evidence. The standard of evidence used in the hearing will be "preponderance of the evidence." Both the complainant and the alleged perpetrator will be afforded equal and timely access to any information that will be used at the hearing. No party may have their lawyer present at any stage of the proceedings before the Grievance Committee but may be assisted in the process by a support person of their choice including an attorney.

In all cases, the Title IX Coordinator will maintain regular communications with both the accuser and accused and provide both parties with equal opportunity to provide information, witness statements, evidence, and other information that may be necessary for the Title IX Coordinator and the Grievance Committee to fully evaluate the alleged offense.

The Committee will decide:

1. Whether the complaint is without merit and that no further action is warranted.
2. What, if any, remedial action is necessary.
3. The nature, scope and timing of any proposed disciplinary action against the alleged perpetrator.

The determination of the merits of the complaint by the Grievance Committee will be final. The Institute will inform both parties simultaneously of its final determination.

The Title IX Coordinator will, barring extenuating circumstance, complete the investigation and make a determination regarding any necessary discipline of accused and remedies to accuser within 60 days of the date that the report is first received by the Title IX Coordinator. The Campus Director will determine if the incident is indicative of systemic issue related to the sex offense and, if so, work with the Institute staff to recommend changes to Institute policies, procedures or training to prevent re-occurrence.

### **Disciplinary Options**

If the Institute determines that unlawful harassment, discrimination or sexual violence has occurred, immediate appropriate corrective action will be taken in accordance with the circumstances involved, and the Institute will take steps to prevent the recurrence. Any employee determined by the Institute to be responsible for unlawful harassment or discrimination will be subject to appropriate disciplinary action, up to and including termination. Remedies for student-related claims may include, but are not limited to, an order to stay away, suspension or expulsion. In the case of sexual violence, the Institute may be required to formally investigate and, if appropriate, pursue disciplinary action under this policy. In addition, complainants who make accusations of sexual harassment in bad faith may be subject to equivalent disciplinary action.

**Penalties:** Substantiated accusations of sexual violence may result in disciplinary action against the offender, up to and including termination of the employee's employment or the student's enrollment. Other potential penalties for unlawful harassment, discrimination or sexual violence include: suspension, community service, probation, no-contact order, or violence prevention training. In case of any formal proceedings against either a student accused of violating this Policy or an employee brought before a Grievance Committee proceeding, the penalties shall be as proposed by the Grievance Committee. In addition, complainants who make accusations of sexual harassment in bad faith may be subject to equivalent disciplinary action.

**Complaint Record and Notice of Outcome:** All proceedings and records will be confidential to the extent permitted by law. However, both parties will be notified, in writing, concurrently about the outcome of any complaint evaluated by the Grievance Committee. Memoranda describing a reprimand will be placed into the files of any student or employee in the event disciplinary action is taken against one of the parties. At the request of the individual alleged to have caused the grievance, a memorandum recognizing a finding of non-harassment or nondiscrimination will be placed into the file of the student or employee.

### **Retaliation Prohibited**

The Institute will not retaliate against you for filing a complaint, and will not tolerate retaliation by students or employees. If you believe you have been retaliated against, you should promptly notify your supervisor, Human Resources or the Title IX Coordinator.

### **Reporting Requirements**

Victims of sexual misconduct should be aware that Institute administrators must issue timely warnings for incidents reported to them that pose a substantial threat of bodily harm or danger to other members of the campus community. The Institute will make every effort to ensure that a victim's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the danger.



The Institute reserves the right to notify parents/guardians of dependent students regarding any health or safety risk, or a change in student status.

### **Additional Information**

Employees should contact Human Resources for more information or any questions related to this policy. Students may contact the Title IX Coordinator with any questions related to this policy. In addition, the U.S. Department of Education Office for Civil Rights (“OCR”) investigates complaints of unlawful harassment of students in educational programs or activities. This agency may serve as a neutral fact finder and will attempt to facilitate the voluntary resolution of disputes with the parties. For more information, visit the OCR website at: <http://www.hhs.gov/ocr/>.

### **Education and Training**

In an effort to promote a safe environment and to prevent acts of sexual misconduct, the Institute engages in primary prevention, awareness, bystander intervention and risk reduction training regarding sexual violence, including dating violence, domestic violence, sexual assault and stalking. The Institute educates the student community about this policy, sexual violence prevention and related Institute policies during all orientations held for new students upon the onset of a class. The Title IX Coordinator and persons serving on the Grievance Committee will receive annual training on issues related to sexual violence. The Title IX Coordinator is responsible for training current students and all Institute faculty and staff about the Institute’s Title IX policies and conducting the new student training. The Institute also provides ongoing prevention and awareness training for current students and staff at least annually.

### **Bystander Intervention and Risk Reduction**

Sexual violence prevention training includes bystander strategies to intervene and prevent possible dating violence, domestic violence, sexual assault, or stalking before it occurs. Under the Clery Act, Bystander Intervention means safe options for individuals to intervene and prevent possible crimes. As a bystander it is important to recognize a situation that could lead to a crime, be aware of cultural differences that may lead to violence, identify safe and positive intervention options and take action to intervene. Suggestions for bystander intervention include:

- If you suspect that an individual is intent on having sexual intercourse with an unwilling partner, try to redirect one or both individuals.
- If you know someone who is intent on having sexual intercourse with a partner who is intoxicated, try to redirect them.
- Don’t condone sexual bantering in group settings.
- Approach everyone as a friend, avoid using violence.
- Recruit help if necessary and if a situation becomes serious contact the police.

If someone tells you they have been sexually assaulted; believe the person, tell them it is not their fault, get the victim to a safe place, help them notify the Title IX coordinator and encourage them to make a police report (remember it is the victim’s choice to report the crime or not).

All crimes, including crimes of sexual violence, can be prevented through steps by the campus community to reduce risk of being a victim of a crime and by intervening before a crime has occurred where there is a reasonable belief that a crime may occur. The Institute urges members of the campus community to take steps to reduce their chances of being a victim of a crime including by: locking doors, securing items of value, walking in pairs at night, avoiding impairment caused by alcohol or drugs and other self-protective steps. In addition, if you witness what you believe to be a situation that may lead to the commission of a crime, the Institute urges all members of the campus community to call 911 or to contact an Institute employee immediately. In addition, members of the campus community may be able to interrupt the commission of a crime of sexual violence by intervening in the situation on a potential victim’s behalf where the intervention is not likely to pose harm to the intervenor. The Institute urges all members of the campus community work together to promote a safe campus environment for everyone. The Institute includes training on bystander intervention and risk reduction in all primary and ongoing training for students and staff. The

Institute includes bystander intervention and risk reduction awareness in its student and employee sexual violence prevention training.

## POLICY STATEMENT ADDRESSING SEX OFFENDER REGISTRATION INFORMATION

The local Police Department provides a link to the California Sex Offender Registry. The Institute is required to inform students and employees about where law enforcement information provided by a State concerning registered sex offenders may be obtained. The law also requires sex offenders already required to register in a State to provide notice of each institution of higher education in that State at which the person is employed, carries a vocation, or is a student. In Arizona a complete list of sex offenders can be obtained at [www.azdpsp.gov/services/sex\\_offender/downloads/](http://www.azdpsp.gov/services/sex_offender/downloads/). In California, information about convicted sex offenders is available at [www.meganslaw.ca.gov](http://www.meganslaw.ca.gov).

The National Registry of Sex Offenders is available via Internet at the following web address:  
<http://www.nationalsexoffenderregistry.com>

## CLERY ACT CRIME REPORT STATISTICS

\*None of the WCUI campuses have non-campus property.

### Beverly Hills Campus

OFFENSE	PROPERTY	2013	2014	2015
Murder/ Non-Negligent Manslaughter	On-Campus Property	0	0	0
	Public Property	0	0	0
Manslaughter By Negligence	On-Campus Property	0	0	0
	Public Property	0	0	0
Rape	On-Campus Property	0	0	0
	Public Property	0	0	0
Fondling	On-Campus Property	0	0	0
	Public Property	0	0	0
Incest	On-Campus Property	0	0	0
	Public Property	0	0	0
Statutory Rape	On-Campus Property	0	0	0
	Public Property	0	0	0
Robbery	On-Campus Property	0	1	0
	Public Property	2	0	0
Aggravated Assault	On-Campus Property	0	0	0

	Public Property	0	0	0
Burglary	On-Campus Property	2	0	0
	Public Property	0	0	0
Motor Vehicle Theft	On-Campus Property	0	0	0
	Public Property	1	0	0
Arson	On-Campus Property	0	0	0
	Public Property	0	0	0
VAWA Offenses: Domestic Violence	On-Campus Property	0	0	0
	Public Property	0	0	0
VAWA Offenses: Dating Violence	On-Campus Property	0	0	0
	Public Property	0	0	0
VAWA Offenses: Stalking	On-Campus Property	0	0	0
	Public Property	0	0	0
Hate Crimes: Related to any of the above listed crimes, and Hate Crimes involving simple assault, larceny-theft, intimidation, or destruction/damage/vandalism of property	On-Campus Property	0	0	0
	Public Property	0	0	0
Arrests: Weapons: Carrying, Possessing, etc.	On-Campus Property	0	0	0
	Public Property	0	0	0
Disciplinary Referrals: Weapons: Carrying, Possessing, etc.	On-Campus Property	0	0	0
	Public Property	0	0	0
Arrests: Drug Abuse Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Disciplinary Referrals: Drug Abuse Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Arrests: Liquor Law Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Disciplinary Referrals: Liquor Law Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Unfounded Crimes	On-Campus Property + Public Property	N/A	N/A	0

## Ontario Campus

OFFENSE	PROPERTY	2013	2014	2015
Murder/ Non-Negligent Manslaughter	On-Campus Property	0	0	0
	Public Property	0	0	0
Manslaughter By Negligence	On-Campus Property	0	0	0
	Public Property	0	0	0
Rape	On-Campus Property	0	0	0
	Public Property	0	0	0
Fondling	On-Campus Property	0	0	0
	Public Property	0	0	0
Incest	On-Campus Property	0	0	0
	Public Property	0	0	0
Statutory Rape	On-Campus Property	0	0	0
	Public Property	0	0	0
Robbery	On-Campus Property	0	0	0
	Public Property	0	0	0
Aggravated Assault	On-Campus Property	0	0	0
	Public Property	0	0	0
Burglary	On-Campus Property	0	0	0
	Public Property	0	0	0
Motor Vehicle Theft	On-Campus Property	0	0	0
	Public Property	0	0	0
Arson	On-Campus Property	0	0	0
	Public Property	0	0	0
VAWA Offenses: Domestic Violence	On-Campus Property	0	0	0
	Public Property	0	0	0
VAWA Offenses: Dating Violence	On-Campus Property	0	0	0
	Public Property	0	0	0
VAWA Offenses: Stalking	On-Campus Property	0	0	0
	Public Property	0	0	0

Hate Crimes: Related to any of the above listed crimes, and Hate Crimes involving simple assault, larceny-theft, intimidation, or destruction/damage/vandalism of property	On-Campus Property	0	0	0
	Public Property	0	0	0
Arrests: Weapons: Carrying, Possessing, etc.	On-Campus Property	0	0	0
	Public Property	0	0	0
Disciplinary Referrals: Weapons: Carrying, Possessing, etc.	On-Campus Property	0	0	0
	Public Property	0	0	0
Arrests: Drug Abuse Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Disciplinary Referrals: Drug Abuse Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Arrests: Liquor Law Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Disciplinary Referrals: Liquor Law Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Unfounded Crimes	On-Campus Property + Public Property	N/A	N/A	0

### Phoenix Campus

OFFENSE	PROPERTY	2013	2014	2015
Murder/ Non-Negligent Manslaughter	On-Campus Property	0	0	0
	Public Property	0	0	0
Manslaughter By Negligence	On-Campus Property	0	0	0
	Public Property	0	0	0
Rape	On-Campus Property	0	0	0
	Public Property	0	0	0
Fondling	On-Campus Property	0	0	0
	Public Property	0	0	0
Incest	On-Campus Property	0	0	0
	Public Property	0	0	0
Statutory Rape	On-Campus Property	0	0	0
	Public Property	0	0	0

Robbery	On-Campus Property	0	0	0
	Public Property	1	0	0
Aggravated Assault	On-Campus Property	0	0	0
	Public Property	0	0	0
Burglary	On-Campus Property	0	0	0
	Public Property	0	0	0
Motor Vehicle Theft	On-Campus Property	0	1	0
	Public Property	2	0	2
Arson	On-Campus Property	0	0	0
	Public Property	0	0	0
VAWA Offenses: Domestic Violence	On-Campus Property	0	0	0
	Public Property	0	0	0
VAWA Offenses: Dating Violence	On-Campus Property	0	0	0
	Public Property	0	0	0
VAWA Offenses: Stalking	On-Campus Property	0	0	0
	Public Property	0	0	0
Hate Crimes: Related to any of the above listed crimes, and Hate Crimes involving simple assault, larceny-theft, intimidation, or destruction/damage/vandalism of property	On-Campus Property	0	0	0
	Public Property	0	0	0
Arrests: Weapons: Carrying, Possessing, etc.	On-Campus Property	0	0	0
	Public Property	0	0	0
Disciplinary Referrals: Weapons: Carrying, Possessing, etc.	On-Campus Property	0	0	0
	Public Property	0	0	0
Arrests: Drug Abuse Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Disciplinary Referrals: Drug Abuse Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Arrests: Liquor Law Violations	On-Campus Property	0	0	0
	Public Property	0	0	0
Disciplinary Referrals: Liquor Law Violations	On-Campus Property	0	0	0
	Public Property	0	0	0

Unfounded Crimes	On-Campus Property + Public Property	N/A	N/A	0
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\* Note – the VAWA crimes listed in each of the charts above were subject to a good faith reporting requirement in 2013.