

No. 19-3389

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

INTERVARSITY CHRISTIAN FELLOWSHIP/USA AND INTERVARSITY
GRADUATE CHRISTIAN FELLOWSHIP,

Plaintiffs-Appellees,

v.

THE UNIVERSITY OF IOWA, ET AL.,

Defendants-Appellants.

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

APPELLEES' APPENDIX VOL. 9

CHRISTOPHER C. HAGENOW
WILLIAM R. GUSTOFF
Hagenow & Gustoff, LLP
600 Oakland Rd. NE
Cedar Rapids, IA 52402
(319) 849-8390 phone
(888) 689-1995 fax
chagenow@whgllp.com

ERIC S. BAXTER
DANIEL H. BLOMBERG
The Becket Fund for
Religious Liberty
1200 New Hampshire Ave. NW
Suite 700
Washington, DC 20036
(202) 955-0095
ebaxter@becketlaw.org

Counsel for Plaintiffs-Appellees

APPENDIX INDEX

VOLUME 9

Tab 18: District Court Appendix Volume IV-B.....	2525
• Kevin Kummer Deposition	2527
• Katrina Schrock Deposition.....	2617
• Andrew Kutcher Deposition.....	2658

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

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

Plaintiffs,

v.

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

Defendants.

Civ. Action No. 18-cv-00080

APPENDIX VOLUME IV-B

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

Christopher C. Hagenow
Hagenow & Gustoff, LLP
600 Oakland Rd. NE
Cedar Rapids, IA 52402
(319) 849-8390 phone
(888) 689-1995 fax
chagenow@whgllp.com

Eric S. Baxter*
Lead Counsel
Daniel H. Blomberg*
The Becket Fund for Religious Liberty
1200 New Hampshire Ave. NW, Suite 700
Washington, DC, 20036
(202) 955-0095 phone
(202) 955-0090 fax
ebaxter@becketlaw.org
dblomberg@becketlaw.org

Counsel for Plaintiff

**Admitted pro hac vice*

APPENDIX INDEX

Volume IV-B

Tab 1 – Deposition Transcript of Kevin Kummer	2136
Tab 2 – Correction Sheet.....	2175
Tab 3 – Exhibit 1	2176
Tab 4 – Exhibit 2.....	2179
Tab 5 – Exhibit 3	2188
Tab 6 – Deposition Transcript of Katrina Schrock.....	2226
Tab 7 – Exhibit 4.....	2259
Tab 8 – Deposition Transcript of Andrew Kutcher	2267
Tab 9 – Exhibit 13	2341
Tab 10 – Exhibit 14	2345
Tab 11 – Exhibit 15	2350
Tab 12 – Exhibit 16.....	2000
Tab 13 – Exhibit 17	2359
Tab 14 – Exhibit 18.....	2363
Tab 15 – Exhibit 19.....	2377
Tab 16 – Exhibit 20.....	2387



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

- COURT REPORTING
- LEGAL VIDEOGRAPHY
- VIDEOCONFERENCING
- TRIAL PRESENTATION
- MOCK JURY SERVICES
- LEGAL TRANSCRIPTION
- COPYING AND SCANNING
- LANGUAGE INTERPRETERS

INTERVARSITY CHRISTIAN FELLOWSHIP/USA, et al.,

Plaintiffs,

vs. Civil Action No. 18-cv-00080-SMR-SBJ

THE UNIVERSITY OF
IOWA, et al.,

Defendants.



DEPOSITION AND TRIAL



(800) 528-3335

NAEGELIUSA.COM

DEPOSITION OF

KEVIN KUMMER

TAKEN ON
THURSDAY, MARCH 28, 2019
8:02 A.M.

UNIVERSITY PARK RESEARCH CENTER
2500 CROSSPARK ROAD, ROOM W219
CORALVILLE, IOWA 52241

IVCF App. 2527

IVCF App 2136

2	<p>1 APPEARANCES</p> <p>2</p> <p>3 APPEARING ON BEHALF OF THE PLAINTIFFS:</p> <p>4 Daniel H. Blomberg, Esquire</p> <p>5 THE BECKET FUND FOR RELIGIOUS LIBERTY</p> <p>6 1124 Park West Boulevard, Suite 204</p> <p>7 Mt. Pleasant, SC 29466</p> <p>8 (202) 349-7222</p> <p>9 (202) 955-0090 (Fax)</p> <p>10 dblomberg@becketlaw.org</p> <p>11</p> <p>12 Eric Baxter, Esquire</p> <p>13 THE BECKET FUND FOR RELIGIOUS LIBERTY</p> <p>14 1200 New Hampshire Avenue NW, Suite 700</p> <p>15 Washington, D.C. 20036</p> <p>16 (202) 955-0095</p> <p>17 (202) 955-0090 (Fax)</p> <p>18 ebaxter@becketlaw.org</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	4
---	--	---

3	<p>1 APPEARANCES CONTINUED</p> <p>2</p> <p>3 APPEARING ON BEHALF OF THE DEFENDANTS:</p> <p>4 George A. Carroll, Esquire</p> <p>5 Iowa Attorney General's Office</p> <p>6 1305 East Walnut Street</p> <p>7 Des Moines, IA 50319</p> <p>8 (515) 281-4931</p> <p>9 George.carroll@ag.iowa.gov</p> <p>10</p> <p>11 Nathan E. Levin, Esquire</p> <p>12 OFFICE OF THE GENERAL COUNSEL, UNIVERSITY OF IOWA</p> <p>13 120 Jessup Hall</p> <p>14 Iowa City, IA 52242</p> <p>15 (319) 384-3340</p> <p>16 (319) 335-2830 (Fax)</p> <p>17 Nathan-levin@uiowa.com</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	5
---	--	---

6

1 DEPOSITION OF
 2 KEVIN KUMMER
 3 TAKEN ON
 4 THURSDAY, MARCH 28, 2019
 5 8:02 A.M.
 6
 7 KEVIN KUMMER, having been first duly sworn, was
 8 examined and testified as follows:
 9 EXAMINATION
 10 BY MR. CARROLL:
 11 Q. Will you state your full name for the
 12 record, please?
 13 A. Kevin Kummer.
 14 Q. Okay. Mr. Kummer, have you ever had your
 15 deposition taken before?
 16 A. Never.
 17 Q. Okay. And I'm sure you talked to your
 18 attorney about the process but I want to talk about
 19 a couple things. The court reporter has to take
 20 down everything you say and what I say. So if I ask
 21 you a yes or no style question, give a verbal
 22 response.
 23 A. Mm-hmm.
 24 Q. Okay?
 25 A. Yes.

7

1 Q. Unlike that.
 2 A. Yes.
 3 Q. It just makes it difficult.
 4 A. Right.
 5 Q. The second thing is let me finish speaking
 6 before you answer my question. Even if you know
 7 what I'm asking, again, it's for the court reporter
 8 because you can't take two people down at the same
 9 time.
 10 A. Right.
 11 Q. If you don't understand my question, just
 12 ask me to restate it so that we're talking the same
 13 things today.
 14 A. Okay.
 15 Q. Okay? What is your current employment
 16 status?
 17 A. I'm considered a senior campus staff
 18 member with InterVarsity Christian Fellowship USA.
 19 Q. And who is your employer?
 20 A. InterVarsity Christian Fellowship USA.
 21 Q. Okay. And where -- where is their
 22 corporate headquarters, if that's what you call
 23 them?
 24 A. Yeah, Madison, Wisconsin.
 25 Q. Okay. And are you physically located in

8

1 Iowa City?
 2 A. Yes.
 3 Q. And you work for -- I'll just shorten it,
 4 InterVarsity if that's okay?
 5 A. That's fine. Yes, I do work for
 6 InterVarsity.
 7 Q. Okay. Full time?
 8 A. Full time.
 9 Q. Okay. And where are you physically
 10 housed?
 11 A. Me, personally, or InterVarsity?
 12 Q. Yeah. I don't mean where you live at
 13 home.
 14 A. Okay.
 15 Q. Where do you go to work every day?
 16 A. Okay. There is no particular center for
 17 InterVarsity. InterVarsity is interdenominational
 18 and so unlike say the Methodists or the Catholics or
 19 the Lutherans, we don't have a campus center. So
 20 when I go to work it's often a coffee house or
 21 somebody's, you know, area on campus, that kind of a
 22 thing.
 23 Q. Okay. And can you just briefly tell me
 24 what InterVarsity's mission is?
 25 A. Yeah. InterVarsity's mission is to

9

1 establish or develop communities of students,
 2 faculty, staff at universities in the country that
 3 are basically reflecting the character of Christ.
 4 And we talk about having -- developing four loves --
 5 growing in love for God; growing in love for God's
 6 word; growing in love for God's people of every
 7 ethnicity and culture, and you can add all the other
 8 diversities within; and for God's purposes in the
 9 world.
 10 Q. Okay. And with respect to InterVarsity's
 11 mission, is that a national mission statement,
 12 international?
 13 A. It's a national mission statement.
 14 Q. Okay. Who is responsible to create that
 15 mission statement?
 16 A. Within InterVarsity it would be, I assume,
 17 senior staff, national staff. I mean, I know that
 18 there's been input from people across the field in
 19 the past, but that particular -- the articulation of
 20 the short of what we call witnessing communities
 21 goes back to the beginning, communities that point
 22 to the character of Christ. I'm probably giving you
 23 more than I should, I mean, more than I need to, but
 24 the other four statements, you know, have been
 25 developed along, during the time I've been with

10

1 InterVarsity.
 2 Q. Okay. And do you have any employment
 3 connection with the University of Iowa?
 4 A. No.
 5 Q. Okay. So are you subject to any
 6 University of Iowa procedures, policies,
 7 regulations?
 8 A. Yes.
 9 Q. And which ones?
 10 A. We're part of the Association of Campus
 11 Ministers, which while that's not a University of
 12 Iowa entity, those are the network of campus
 13 ministers that the university administration relates
 14 to. And there are various things that we – we
 15 respect others' groups. We don't proselytize from
 16 their groups. We don't – we don't go on to campus
 17 in people's dorms or living units uninvited, that
 18 kind of a thing. There are various kinds of – I
 19 can't tell you every single policy, but basically
 20 it's a policy of mutual respect and operating within
 21 the university's parameters.
 22 Q. Okay. And the university parameters, are
 23 you familiar with them?
 24 A. I'm familiar with some. I'm sure I'm not
 25 familiar with all. Sure.

11

1 Q. For example, you understand that you need
 2 permission to go into University of Iowa dormitory?
 3 A. Yes.
 4 Q. Okay. You understand that those buildings
 5 are locked?
 6 A. Yes.
 7 Q. Okay. So if you wanted to go into a
 8 dormitory and hold a meeting, for example, with your
 9 group or potential new group members, who do you go
 10 to to get permission?
 11 A. We have student leaders, and the student
 12 leaders are the ones that would set up the meetings
 13 and get permission.
 14 Q. Okay. And so then the permission would be
 15 granted – the student leaders would ask for it but
 16 perhaps you'd be included?
 17 A. I might be or I might not be. Yeah.
 18 Q. Okay. Now, you understand if you're on
 19 university property, for example, a dormitory, you
 20 are subject to all University of Iowa rules and
 21 regulations?
 22 A. Yes.
 23 Q. Okay. For example, you understand alcohol
 24 is prohibited in a dormitory?
 25 A. Yes.

12

1 Q. Okay. It's a very simple example but it
 2 is a university rule, even though many people that
 3 live in the dorms are of legal age.
 4 A. Right.
 5 Q. Okay. And then there's other rules, for
 6 example. Are you familiar with the University of
 7 Iowa's human rights policy?
 8 A. Yes.
 9 Q. How are you familiar with that?
 10 A. It's something that each year we include
 11 in our constitution and we include with
 12 attentiveness.
 13 Q. Okay. And what's your understanding of
 14 the University of Iowa human rights policy?
 15 A. Well, in a nutshell, that we treat every
 16 single person regardless of their religious, ethnic,
 17 cultural, sexual orientation, et cetera, with
 18 respect and hospitality and --
 19 Q. Okay.
 20 A. -- graciousness, value.
 21 Q. And let me show you what's – if you could
 22 mark this.
 23 Do you want to just keep going on the
 24 numbers, or how do you want to do it? What's more
 25 convenient?

13

1 MR. BAXTER: Why don't you do your
 2 numbering --
 3 MR. BLOMBERG: Yeah, I think that's right.
 4 Start your numbering at Exhibit 1.
 5 MR. CARROLL: Okay. All right. So this
 6 will be Exhibit 1. And here's a copy for you. This
 7 should be --
 8 THE REPORTER: Exhibit 1 is marked.
 9 (WHEREUPON, Exh bit 1 was marked for
 10 identification.)
 11 MR. CARROLL: Here is Exhibit 2. It's not
 12 stapled but -- oh, no, yours is. There you go.
 13 THE WITNESS: Thank you.
 14 BY MR. CARROLL:
 15 Q. I'm going to show you what's been marked --
 16 -- so we'll go off Exhibit 1 even though it says
 17 Exhibit B up here. Okay? And if you'd turn to the
 18 second page, please.
 19 A. This one?
 20 Q. No, I'm sorry. I was counting that as
 21 page one.
 22 A. Okay.
 23 Q. Do you see in the middle, the human rights
 24 clause component?
 25 A. Yes.

14

1 Q. Okay. And is that the policy that you are
 2 familiar with at the University of Iowa?
 3 A. It is.
 4 Q. And so it provides in part, "In no aspect
 5 of its programs shall there be any difference in the
 6 treatment of persons on the basis of race, creed,
 7 color, religion, national origin." And I'll stop
 8 there.
 9 You understand that the University of Iowa
 10 says under its human rights policy that there can be
 11 no discrimination based on religion or creed?
 12 A. Yes.
 13 Q. Okay. Are you familiar with Mr. Kutcher?
 14 A. Yes.
 15 Q. How are you familiar with him?
 16 A. As part of the Association of Campus
 17 Ministers, we meet with Dr. Shivers and her staff,
 18 and we've met with IMU staff for joint, kind of
 19 sharing of concerns and passing new information.
 20 This year we've had a couple of meals together with
 21 her department and some of the folks from the
 22 University of Iowa. So that's how I know him. I
 23 know his name from email but I didn't meet him until
 24 this year, this academic year.
 25 Q. Okay. And are you familiar with the fact

15

1 that the University – or excuse me, the State of
 2 Iowa just – the governor signed a Freedom of Speech
 3 bill?
 4 A. I have learned that. Yes.
 5 Q. Okay. Were you involved in any manner
 6 with the advocacy of such a bill?
 7 A. No. I may have written an email a while
 8 back encouraging some state senators to support such
 9 a bill, but actually, when I did that I think it was
 10 not passed.
 11 Q. Okay. And, well, I'll ask you. You're
 12 familiar with this pending litigation?
 13 A. Familiar is too strong of a word, but yes.
 14 Q. Okay. You know that's the reason you're
 15 here?
 16 A. Oh, yes. Yes.
 17 Q. Okay.
 18 A. Yes.
 19 Q. All right. So are you familiar with the
 20 specifics of the litigation?
 21 A. I'm familiar with some. I don't know what
 22 you're alluding to, but –
 23 Q. Okay. All right. So do you understand
 24 that, in fact, at some point the University of Iowa
 25 wanted all student – registered student

16

1 organizations to make sure their constitutions were
 2 in compliance with the human rights policy?
 3 A. Yes.
 4 Q. Okay. And if we look at Exhibit B, do you
 5 see the date there?
 6 A. Yes, I do.
 7 Q. What is the date?
 8 A. June 1st.
 9 Q. Of what year?
 10 A. 2018.
 11 Q. Okay. Did you see this email at or about
 12 the time?
 13 A. In 2018?
 14 Q. Yes.
 15 A. Actually, I was overseas but I did check
 16 my email and see it. Yes.
 17 Q. Okay. Were you involved in InterVarsity's
 18 responses to the University of Iowa to make sure
 19 their constitution was compliant?
 20 A. Only at this level, yes, I was. I
 21 interacted via email with our student leaders and I
 22 was part of making sure that this was in our – it
 23 was in our constitution.
 24 Q. Okay. Let me ask you, how long have you
 25 been affiliated with InterVarsity?

17

1 A. This is my 40th year.
 2 Q. Okay. How does InterVarsity's leadership
 3 selection criteria comply with the University of
 4 Iowa's human rights clause?
 5 MR. BLOMBERG: Objection; calls for legal
 6 conclusion.
 7 You may answer if you can.
 8 THE WITNESS: It complies with the clause
 9 in that it doesn't discriminate against people based
 10 on any of these particular issues.
 11 BY MR. CARROLL:
 12 Q. Okay. Do you have to – your leadership
 13 clause or membership selection for leaders, don't
 14 you have to believe in the tenets that you just
 15 explained to me earlier this morning?
 16 A. Yes. Leaders within InterVarsity, and
 17 that has been part of our – part of our
 18 constitution for 22 years here at the University of
 19 Iowa, are expected to agree with the core beliefs of
 20 a Christian community and to share their vision.
 21 Yeah.
 22 Q. Okay. And so when we look at B and the
 23 human rights clause, it says that you cannot
 24 discriminate. There shall be no – there shall be
 25 any difference in the treatment of persons on the

18

1 basis of race, creed, color, religion. So if I
 2 don't believe in your religious tenets, are you
 3 violating – and I'm not asking a legal question –
 4 are you violating the words of the Iowa human rights
 5 clause?
 6 MR. BLOMBERG: Objection to the extent it
 7 calls for a legal conclusion.
 8 You may answer if you can.
 9 THE WITNESS: It depends on how you
 10 interpret the clause.
 11 BY MR. CARROLL:
 12 Q. I'm sorry?
 13 A. It depends on how you interpret the
 14 clause.
 15 Q. Okay. Well, how do you interpret
 16 religion?
 17 A. Religion in this case would be, you know,
 18 if we're talking about a faith-based community in
 19 the university, it would be people who share their
 20 faith commitments, whether they're Christian,
 21 Jewish, Muslim, Sikh, Mormon, fill in the blank,
 22 atheist.
 23 Q. Okay.
 24 A. Their core beliefs.
 25 Q. And are the groups, the individuals you

19

1 mentioned, are they all eligible to be leaders in
 2 InterVarsity?
 3 A. Anyone is eligible to be but there's a
 4 leadership selection process, and a key part of that
 5 would be that they would be able to be on the same
 6 page as this.
 7 Q. Okay.
 8 A. If they weren't Christians, if they didn't
 9 believe some of the same things we did, it wouldn't
 10 make any sense to have them as leaders.
 11 Q. Okay. So it would never make sense to
 12 have an atheist in your group, would it?
 13 A. We have lots of people in our group,
 14 including atheists. Yeah.
 15 Q. But as a leader. Excuse me.
 16 A. It wouldn't make sense. No. I wouldn't
 17 think an atheist would want to be a leader of a
 18 Christian group.
 19 Q. How are the leaders selected?
 20 A. Student leaders are the ones responsible.
 21 The current student leaders would be the ones that
 22 would then pray and get input from people in the
 23 group about people to nominate and consider. And I
 24 would be an advisor to that. And since it's a
 25 student-run organization, student-run movement, I'm

20

1 there as an advisor but I don't have authority in
 2 making those decisions. I would be part of the
 3 discussion and the process, and people would be
 4 talked to, interviewed.
 5 Q. Okay. So if I understand your answer, the
 6 current leaders select their successors?
 7 A. They do in general. Sometimes if we have
 8 a surplus of leaders, which is a nice luxury that's
 9 not normally there, we'd have something we call a
 10 nominating committee. So they would be senior
 11 people in the group, including someone from the
 12 leadership team who would be set aside to do the
 13 same thing as right now because we don't have a
 14 surplus of leaders, the leadership team is
 15 responsible.
 16 Q. So can I be, for lack of a better term,
 17 excuse me, a nonbeliever and be a member?
 18 A. Yes.
 19 Q. Okay. Can I attempt to be a leader?
 20 A. You could.
 21 Q. At any stage do the members select their
 22 leadership?
 23 A. They all have input. And we – we all
 24 have input, and we tend to operate on the basis of
 25 trying to have consensus. And so we don't have a

21

1 voting process. Generally, a voting process is one
 2 that excludes the minority. So we seek consensus on
 3 the whole. If people that were nominated by the
 4 leadership team for leadership the next year, those
 5 names are usually presented to the group as a whole.
 6 And if people have concerns or ways in which they
 7 want to say, yes, I think that person would be
 8 great, they're invited to do that, and that's all
 9 taken seriously.
 10 Q. Okay. So, but the short answer is members
 11 aren't voting for their leaders?
 12 A. Not if you mean a strict vote up and down.
 13 Q. Yeah, I do.
 14 A. Yeah. So the members don't get that
 15 strict up and down vote. That's right.
 16 Q. Okay. There is consensus. There's input.
 17 There's interest. The items that you discussed.
 18 A. Mm-hmm. Mm-hmm.
 19 Q. So is it fair to say that the leaders in
 20 InterVarsity all agree with and strive to achieve
 21 the tenets that you described earlier this morning?
 22 A. To the degree that they understand them,
 23 they're a lot younger, even grad students, then I
 24 am, so people are in different places in their own
 25 understanding of things, but yes, they'd have to be

<p style="text-align: right;">22</p> <p>1 able to do that. Yeah.</p> <p>2 Q. So the rest of these categories in the</p> <p>3 human rights clause, for example, leadership, you</p> <p>4 couldn't discriminate on race; correct?</p> <p>5 A. Correct.</p> <p>6 Q. Color?</p> <p>7 A. You can go through the whole list. There</p> <p>8 would be no basis there that we would discriminate</p> <p>9 on.</p> <p>10 Q. Okay. And so when I get to religion and</p> <p>11 creed, can I be -- can I literally be a nonbeliever</p> <p>12 and be a leader of InterVarsity?</p> <p>13 A. Not likely, no.</p> <p>14 Q. Well, there's a distinction here. Not</p> <p>15 likely being selected.</p> <p>16 A. I was going to say, there are people who</p> <p>17 exercise leadership within the group who are not</p> <p>18 necessarily believers. Not that they would be</p> <p>19 official, you know, designated leaders.</p> <p>20 Q. Okay. So let's go with official.</p> <p>21 A. Okay.</p> <p>22 Q. Can I be an official leader and be a</p> <p>23 nonbeliever?</p> <p>24 A. No.</p> <p>25 Q. And why not?</p>	<p style="text-align: right;">24</p> <p>1 University of Iowa functions?</p> <p>2 A. I'd have to have clarification as to what</p> <p>3 --</p> <p>4 Q. All right. So you're indirectly involved</p> <p>5 with the University of Iowa through InterVarsity?</p> <p>6 A. Yes. And I'm a member of the Association</p> <p>7 of Campus Ministers.</p> <p>8 Q. Okay. And that has some association with</p> <p>9 Iowa?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. So for example, are you involved</p> <p>12 with the University of Iowa Historical Group?</p> <p>13 A. Not directly as a group. I mean, we might</p> <p>14 have individuals that are part of, you know, the</p> <p>15 kinetic of it.</p> <p>16 Q. So is it fair to say that your connection</p> <p>17 with the University of Iowa is based on InterVarsity</p> <p>18 and the campus ministries?</p> <p>19 A. Yes. And being, you know, we're part of</p> <p>20 the campus community. You know, so for example,</p> <p>21 when Barach Obama a few years back was speaking and</p> <p>22 asked for someone from the university to provide</p> <p>23 someone to lead in prayer, Tom Rockland asked me to</p> <p>24 do that, and I did that. So that was a university</p> <p>25 function in which I opened in prayer at Tom</p>
<p style="text-align: right;">23</p> <p>1 A. Because it is a Christian faith-based</p> <p>2 organization and a leader of a Christian faith-based</p> <p>3 organization, it only makes sense that they would be</p> <p>4 a Christian. And so, yeah, mm-hmm.</p> <p>5 Q. When you said, "so, yeah," what did you</p> <p>6 mean? That they just can't be?</p> <p>7 A. They can enter the process. We'd talk</p> <p>8 with people individually. Yeah. Mm-hmm.</p> <p>9 Q. Okay.</p> <p>10 A. But -- but in the end, if a person doesn't</p> <p>11 -- if you're not on the same page, just as in the</p> <p>12 university, you know, the university doesn't hire</p> <p>13 people who can't affirm this human rights policy, so</p> <p>14 the university discriminates against people who</p> <p>15 can't do that. So in the same way you'd say that.</p> <p>16 You wouldn't hire someone at the university who is</p> <p>17 unqualified or has an anti-intellectual attitude.</p> <p>18 So you make discriminations but you make</p> <p>19 discriminations in that respect. That's not the</p> <p>20 same thing as discriminating against a person</p> <p>21 because of that. You don't treat them as less. And</p> <p>22 we've never had an instance in which anybody who is</p> <p>23 a nonbeliever of any kind said, oh, I want to be a</p> <p>24 leader in this group.</p> <p>25 Q. Okay. And are you involved in any other</p>	<p style="text-align: right;">25</p> <p>1 Rockland's invitation. There have been other kinds</p> <p>2 of events where after 9/11 the university invited</p> <p>3 the Association of Campus Ministers to help</p> <p>4 facilitate times of prayer and reflection. That</p> <p>5 went on for several years. The first anniversary</p> <p>6 was the largest scale of that. You know, I could go</p> <p>7 on and list other university events and concerns</p> <p>8 that we've participated in either as a particular</p> <p>9 student group or in my role as a campus minister as</p> <p>10 associated with the Association of Campus Ministers.</p> <p>11 Q. Okay. Are you familiar with the breadth</p> <p>12 of the registered student organizations on Iowa's</p> <p>13 campus?</p> <p>14 A. I'm not sure again what you mean.</p> <p>15 Q. Well, are you aware that there's over 500?</p> <p>16 A. Yeah, I know that there's a lot of groups.</p> <p>17 Q. Okay. And so if we look at a different</p> <p>18 group, for example, a group that may be supportive</p> <p>19 of Women of Color, do you think the Women of Color</p> <p>20 group has the right to exclude people that aren't</p> <p>21 women of color?</p> <p>22 A. Yes. Mm-hmm.</p> <p>23 Q. And on what basis?</p> <p>24 A. On the basis that the group is designed</p> <p>25 for women of color. If it became some in which, you</p>

26

1 know, white men came in and took office, it wouldn't
 2 fulfill its purpose. In fact, we had a Women of
 3 Color support group for many years within the grad
 4 group, which is a wonderful and rich experience for
 5 women of color who weren't finding in the university
 6 a very affirming kind of situation.

7 Q. Okay. Can I, as a white man, support
 8 Women of Color?

9 A. You can be supportive. Yes.

10 Q. Okay. Can I, as a white man, be a leader
 11 of Women in Color?

12 MR. BLOMBERG: Objection in the sense of
 13 you don't have a specific Women of Color group that
 14 you know of.

15 Answer if you can.

16 THE WITNESS: If I were part of a Women of
 17 Color group I wouldn't want a white man to be one of
 18 my leaders.

19 BY MR. CARROLL:

20 Q. Okay. And with that answer, wouldn't that
 21 be discrimination based on my race?

22 A. No. That would be making a decision based
 23 on the purpose of a group and the right of the
 24 people in it to gather. I know the women of color
 25 in the group that InterVarsity sponsored for

27

1 probably about 10 years valued the fact that it was
 2 just women. And if a man came into the meeting it
 3 would have changed the character of it all together.
 4 They – they broadened the definition of color to
 5 include all colors because it wasn't meant to be
 6 something excluded to Hispanic, Latina, you know,
 7 even white women, so in time there were other folks.
 8 But it was predominantly African-American women who
 9 formed this group.

10 Q. Right. Historically, it was. It's
 11 expanded.

12 As a white man, if I'm fully supportive of
 13 women of color, in fact, my wife and daughters are
 14 women of color, do you think I could still be
 15 excluded?

16 A. It depends on what you mean by excluded.

17 Q. Excluded from leadership?

18 A. Yeah, I do.

19 Q. Okay. And that's because I'm not what?

20 A. A woman.

21 Q. Of color?

22 A. Depending on how color is defined but
 23 you're at least not a woman.

24 Q. Right. Okay. So it stops me right there?

25 A. Right. Mm-hmm.

28

1 Q. Okay.

2 A. I would have loved to have been part of
 3 some of the Women of Color groups that we had
 4 gather, and they had some of the richest times. I
 5 heard stories about it but I didn't attempt to be
 6 because I'm not a woman of color. And that would
 7 have violated the purpose of their group and the
 8 culture and the atmosphere of it.

9 Q. Okay. So it would violate the purpose of
 10 the group. Would you agree it would be in conflict
 11 with the University of Iowa human rights clause?

12 MR. BLOMBERG: Objection; calls for legal
 13 conclusion.

14 You can answer if you can.

15 THE WITNESS: Not the way I would
 16 understand it. No. It's absurd – it's absurd to
 17 think that a Women of Color group can't
 18 discriminate, depending on what you mean by
 19 discriminate, as in make a decision that the group
 20 is for women of color. To say that that somehow
 21 discriminates against white men is like saying
 22 because there's some sort of law that protects
 23 people of color, therefore, white men are being
 24 excluded from that law.

25 BY MR. CARROLL:

29

1 Q. Okay. And let me ask you, and you don't
 2 even need a legal definition, just your life
 3 experience, what does the word "discrimination" mean
 4 to you?

5 A. Again, it depends on how you use it. You
 6 can use discrimination – sorry, I'll try to slow
 7 down. You can use the word discrimination as in
 8 you're being discriminating about something. You
 9 know, you're not eating anything that's out there.
 10 You're being discriminating about eating healthfully
 11 or whatever. You're discriminating in terms of your
 12 tastes and your decisions. Everybody makes
 13 decisions about what they do or don't do, what
 14 groups they're part of or not. All of that is being
 15 discriminating. But discrimination, as a violation
 16 of human rights seems to me that you somehow treat
 17 someone less, you dishonor them, you don't respect
 18 them, you don't respect boundaries. I would say
 19 there are different ways that you discriminate in
 20 that respect. And I mean, one of the reasons we
 21 exist is because actually we believe every last
 22 human being is vitally valuable, that every last
 23 human being is made in God's image. That every last
 24 human being is precious. That the university as a
 25 community is a valuable place. That to live out

30	<p>1 your faith in that community means that you need to</p> <p>2 be part of the community and not marginalized.</p> <p>3 Those are all things that are at the center of why</p> <p>4 we even exist. And so I would not consider any of</p> <p>5 those – I don't feel discriminated against by a</p> <p>6 Muslim because I'm a Christian minister if I'm not</p> <p>7 asked to speak at a Muslim event. I don't feel</p> <p>8 discriminated against if I'm excluded from certain</p> <p>9 things because I'm not Jewish. There are things I'm</p> <p>10 included in in the Jewish community here and have</p> <p>11 wonderful experiences at Halal. There's all kinds</p> <p>12 of things that I get to be included in, but I don't</p> <p>13 think that I should be someone who – I don't feel</p> <p>14 discriminated against and don't consider myself</p> <p>15 discriminated against if I'm not asked, and if I'm</p> <p>16 not allowed to be a leader of a Muslim student group</p> <p>17 or an atheist society, et cetera.</p> <p>18 Q. Do you follow Iowa sports at all?</p> <p>19 A. Mm-hmm.</p> <p>20 Q. All right.</p> <p>21 MR. BLOMBERG: Yes.</p> <p>22 THE WITNESS: Yes. That's a yes. I'm</p> <p>23 sorry. That's a yes. They torture me every year,</p> <p>24 you know. You know how Iowa is. We look like we're</p> <p>25 21-6 and now we lose four of them. Anyway. Sorry.</p>	32
31	<p>1 there being distinctions there can be more</p> <p>2 opportunities. But again, a distinction or</p> <p>3 discrimination is being made, certainly.</p> <p>4 Q. Okay. And are you familiar with the fact</p> <p>5 that – do you know what Title IX is?</p> <p>6 A. It has to do with equal funding as far as</p> <p>7 I understand, of men's and women's –</p> <p>8 Q. Sports.</p> <p>9 A. -- sorts, yeah.</p> <p>10 Q. Okay. And other –</p> <p>11 A. Yeah.</p> <p>12 Q. -- programs?</p> <p>13 A. Right.</p> <p>14 Q. Okay. Were you involved in the back and</p> <p>15 forth on the – between Iowa and InterVarsity to</p> <p>16 change the constitution?</p> <p>17 A. Besides the situation that I mentioned</p> <p>18 here, no, because I was out of the country.</p> <p>19 Q. Okay. And so how long were you out of the</p> <p>20 country?</p> <p>21 A. It was about three and a half weeks.</p> <p>22 Q. Okay. Were you -- you indicated earlier</p> <p>23 you were checking your emails. Were you actually</p> <p>24 involved in the interaction between Iowa and</p> <p>25 InterVarsity locally?</p>	33

34

1 A. Only in the beginning of the month.
 2 Q. Okay.
 3 A. In other words, the initial one.
 4 Q. And the beginning, is it the month June?
 5 A. Yeah.
 6 Q. Yes? Okay.
 7 A. I think it was – yeah, this is dated June
 8 1st. I seem to have in my head June 2nd is when I
 9 might have read the email but I put in the response
 10 to that. But beyond that I was not the person doing
 11 things because I was out of the country. Yeah.
 12 Q. Would you ordinarily be – let's say you
 13 were local. So you're not – I don't know if you
 14 were on vacation or business.
 15 A. Vacation, yeah.
 16 Q. Okay. Would you ordinarily be involved
 17 day to day with things like this that are coming
 18 from Iowa to InterVarsity?
 19 A. In an advisory role, yes.
 20 Q. Okay. So, for example, you understand
 21 there's a fall and January recruitment fair?
 22 A. Yeah.
 23 Q. At the IMU?
 24 A. Absolutely.
 25 Q. Okay. Are you directly – as long as

35

1 you're in town, are you directly involved in that
 2 recruitment fair?
 3 A. Yes.
 4 Q. Are you physically at the Union?
 5 A. If I can be.
 6 Q. Okay. All right. And so in this case, if
 7 you were – if you know, if you were in town, would
 8 you have been directly involved as opposed to
 9 checking emails?
 10 A. I certainly would have been more involved
 11 than I was by checking emails twice in three weeks,
 12 yes.
 13 Q. Okay. So would you mark Exhibit – this
 14 is Exhibit 2 then, please.
 15 THE REPORTER: Exh bit 2 is marked.
 16 (WHEREUPON, Exhibit 2 was marked for
 17 identification.)
 18 BY MR. CARROLL:
 19 Q. I'll show you what's been marked as
 20 Exhibit 2.
 21 A. Are we finished with this for now?
 22 Q. We may come back but you can move it away.
 23 And again, I call that the first page, so
 24 if you can turn to the second page.
 25 A. Mm-hmm.

36

1 Q. Yes?
 2 A. Mm-hmm.
 3 Q. Okay. Do you see, who is the email from?
 4 A. Andrew Kutcher.
 5 Q. Okay. And who is it to?
 6 A. Katrina Schrock.
 7 Q. And who is Katrina Schrock?
 8 A. She is the – this year's 2018-2019
 9 chapter president of InterVarsity Graduate Christian
 10 Fellowship.
 11 Q. Okay. Is she a University of Iowa
 12 student?
 13 A. She is. She's a graduate student.
 14 Q. All right. And would this – is this an
 15 appropriate individual for Mr. Kutcher to email to?
 16 A. It is.
 17 Q. Is she, at this time, June of 2018, would
 18 she have been the contact person?
 19 A. She would have just started. In May is
 20 when we do the transitions, so one of her first
 21 experiences of interacting with the university
 22 administration was this one.
 23 Q. But this is clearly – I guess my question
 24 is, it went to the right person, didn't it?
 25 A. If it went to Katrina, it did. Yes. Uh-

37

1 huh.
 2 Q. Okay. Is there any reason to doubt –
 3 you're familiar with emails.
 4 A. Yeah, sure.
 5 Q. Is there any reason to doubt it's from
 6 Andy to Katrina?
 7 A. Oh, no. No. No.
 8 Q. Okay. And I will represent there are
 9 names redacted because this is coming from different
 10 litigation. They're not my redactions, necessarily.
 11 So then we have the – if you would look at – let
 12 me ask you this. Are you familiar with this email?
 13 A. Yes.
 14 Q. And were you familiar with it at the time?
 15 A. It would have been after – a bit after
 16 the fact. I got back – I can't remember if it was
 17 – somewhere around the 20th of June.
 18 MR. BLOMBERG: George, just to clarify,
 19 are you referring to the email at the top of page
 20 two or are you referring to the entire email trail?
 21 MR. CARROLL: Just the first paragraph for
 22 now.
 23 MR. BLOMBERG: Okay.
 24 THE WITNESS: Yeah. After I got back is
 25 when I became familiar with it.

38

1 BY MR. CARROLL:
 2 Q. Okay. And what, if any documents, did you
 3 review to prepare for today's deposition?
 4 A. Just my own statements.
 5 Q. And what are those?
 6 A. What's the official term? It's what --
 7 what you've got.
 8 MR. BLOMBERG: The declaration.
 9 THE WITNESS: They're the declaration.
 10 BY MR. CARROLL:
 11 Q. Okay. So you're talking about things that
 12 have been filed in the lawsuit?
 13 A. Yes. Yes.
 14 Q. All right. Okay. So when we look at this
 15 email, and we'll start at the top, we're talking
 16 about a deadline for InterVarsity to submit a --
 17 I'll just -- my terms -- cleaned up constitution.
 18 Do you see that?
 19 A. I'm sorry. Yes.
 20 Q. Okay. And what, if any, contact did you
 21 have with Katrina to, one, meet this deadline?
 22 A. Like I said, it wasn't really until after
 23 the fact.
 24 Q. Okay. Were you -- after the fact, did you
 25 become aware of the dialogue between Iowa and

39

1 InterVarsity?
 2 A. Yes.
 3 Q. Okay. What did you understand, if
 4 anything, that the sticking point was?
 5 A. The sticking point seems to be that we
 6 have a leadership clause, a leadership selection
 7 clause that includes expecting our leaders to share
 8 Christian faith and a general affirmation of the
 9 purpose.
 10 Q. Okay. So you understood that the
 11 University of Iowa's position was you can't have
 12 that type of distinction?
 13 A. Not until then I didn't because, like I
 14 said, I've been here for 22 years and we've never
 15 had any issue made with that until this June.
 16 Q. Okay. Because you've worked a long time,
 17 you understand issues arise and people have to
 18 react, correct?
 19 A. Yes.
 20 Q. Okay. Do you know why the University of
 21 Iowa was having -- at least, let's just limit it to
 22 InterVarsity -- why the University of Iowa was
 23 having InterVarsity review its constitution and make
 24 it compliant?
 25 A. I can't speak to motivation if that's what

40

1 you're asking me in terms of that, but the
 2 interpretation that was being -- the interpretation
 3 and the application that was being employed was
 4 certainly different than the previous 21 years.
 5 Q. Okay.
 6 A. And so an issue was being made of a
 7 Christian group expecting its leaders to be
 8 Christians.
 9 Q. All right. Are you familiar with the
 10 Blink litigation?
 11 A. I'm aware of it. Familiar is maybe too
 12 strong a term, but yes, I know about it.
 13 Q. Okay. Are you aware that because of the
 14 Blink ruling the University of Iowa decided to
 15 review all student organizations to make sure they
 16 were compliant?
 17 A. Yes.
 18 Q. Are you aware of the fact that it wasn't
 19 just geared towards religious groups?
 20 A. I'm aware of the fact that it included all
 21 groups.
 22 Q. Okay. So approximately 500 student
 23 groups?
 24 A. Yes.
 25 Q. Okay. So then, is it fair to say that

41

1 InterVarsity's position became we're going to choose
 2 our leaders on the basis of what we want to?
 3 A. No, InterVarsity's position hasn't
 4 changed. In the 40 years that I've been with
 5 InterVarsity, the expectation is that the leaders of
 6 a Christian student group would be people who shared
 7 that faith.
 8 Q. You understand that the University of Iowa
 9 said we're not going to allow that moving forward?
 10 A. I understand that that's how this has been
 11 interpreted by the university; yes.
 12 Q. Okay. And so despite the 22 year history,
 13 do you agree that the University of Iowa could come
 14 in and say moving forward we are not going to do it
 15 this way anymore?
 16 MR. BLOMBERG: Objection; calls for a
 17 legal conclusion.
 18 You can answer if you can.
 19 THE WITNESS: I understand that that's
 20 what they did. I think it's a ridiculous way of
 21 applying the rule.
 22 BY MR. CARROLL:
 23 Q. Okay.
 24 A. One which involves other violations of
 25 human rights and discriminations in the process of

42

1 supposedly trying to protect them.
 2 Q. Can you explain that last clause?
 3 A. Yeah. It ends up being something that
 4 discriminates against religious commitment.
 5 Q. Okay. Are you familiar with – and I'm
 6 not going to ask you the components of it. Are you
 7 familiar with Title VII, the employment
 8 discrimination laws?
 9 A. Perhaps but you'd have to elaborate on
 10 what you mean.
 11 Q. Do you understand that in 1965, a broad
 12 law was passed to cover the United States of America
 13 that prohibited discrimination based on race, creed,
 14 sex?
 15 MR. BLOMBERG: Objection; calls for legal
 16 conclusion.
 17 You can answer if you can.
 18 THE WITNESS: Generally.
 19 BY MR. CARROLL:
 20 Q. Did the law exist before 1965, if you
 21 know?
 22 A. I was eight. I'm not sure.
 23 Q. You understand historically there's been
 24 discrimination against African-Americans –
 25 A. Absolutely.

43

1 Q. And I'm sorry. You have to let me finish.
 2 A. I'm sorry. You asked me to do that.
 3 Sorry. Go ahead.
 4 THE REPORTER: If you could maybe slow
 5 down just a tad. I'd appreciate it.
 6 THE WITNESS: Yeah.
 7 BY MR. CARROLL:
 8 Q. Okay. So you understand before Title VII
 9 was passed there was no federal law prohibiting
 10 discrimination?
 11 A. I'm not surprised at that.
 12 Q. Okay.
 13 A. So I would say yes, in general.
 14 Q. Do you understand then that a change was
 15 made in how things were being done in the United
 16 States?
 17 A. Yes.
 18 Q. Okay. So in June of 2018, isn't it fair
 19 that the University of Iowa said to InterVarsity,
 20 we're not going to move forward under the past
 21 model?
 22 MR. BLOMBERG: Objection; calls – to the
 23 extent it calls for legal conclusion.
 24 You can answer if you can.
 25 THE WITNESS: No, it's not fair because

44

1 it's discriminatory.
 2 BY MR. CARROLL:
 3 Q. Okay. So –
 4 A. It violates its own policy.
 5 Q. Okay. So is it fair to change as times
 6 change but you think in this case it was
 7 discriminatory change?
 8 A. Some changes are towards justice and some
 9 are not.
 10 Q. Okay. And can you explain to me how the
 11 University of Iowa's proposed change for
 12 InterVarsity and all the other groups was
 13 discriminatory?
 14 A. Well, I don't know all the reasons why the
 15 university might have derecognized or sought to
 16 derecognize groups that are not faith based. I
 17 don't think it's because of the same reasons.
 18 Actually, can you rephrase the question?
 19 My train of thought is – say it again, please. I'm
 20 sorry.
 21 Q. Okay. When you said that what appeared to
 22 be a change after 22 years, where it was obviously
 23 the University of Iowa saying we're going to make a
 24 change moving forward, you said that change is
 25 discriminatory in and of itself.

45

1 A. Yes.
 2 Q. Okay. So why do you say it's
 3 discriminatory in and of itself?
 4 A. Because it disallows for a faith
 5 commitment to be something that is required by a
 6 faith community.
 7 Q. Okay. And is it – are you limiting –
 8 you understand that the University of Iowa was
 9 trying to apply this across all groups, student
 10 organizations?
 11 A. In terms of their response to the Blink
 12 case, that seemed to be what they were trying to do.
 13 Yes.
 14 Q. So can the University of Iowa – are you
 15 limiting your discrimination comments to
 16 faith-based?
 17 A. Could you clarify your question?
 18 Q. Yes. So for example, if we had an
 19 African-American student group, just like the Women
 20 of Color, can they say if you're not African
 21 American you cannot be a leader?
 22 MR. BLOMBERG: Objection; calls for
 23 speculation and legal conclusion.
 24 You can answer if you can.
 25 THE WITNESS: I'm not sure I can answer.

<p style="text-align: right;">46</p> <p>1 BY MR. CARROLL:</p> <p>2 Q. But your group is allowed to choose its</p> <p>3 membership based on religious beliefs; correct?</p> <p>4 MR. BLOMBERG: Objection; mischaracterizes</p> <p>5 the testimony. He hasn't said that the policy</p> <p>6 allows them to select their leaders based on faith.</p> <p>7 MR. CARROLL: Well, I think the record</p> <p>8 does demonstrate that, and so I'll just ask you</p> <p>9 again.</p> <p>10 BY MR. CARROLL:</p> <p>11 Q. Do you believe that your group can select</p> <p>12 its leaders based on the religious beliefs?</p> <p>13 A. I believe that my group ought to be able</p> <p>14 to select its leaders based on their agreement with</p> <p>15 an understanding, a shared understanding of</p> <p>16 Christian faith.</p> <p>17 Q. Okay. And when you say "ought to," what</p> <p>18 do you mean by that term?</p> <p>19 A. I mean, I don't think that the university</p> <p>20 ought to even be attempting to do what it's doing.</p> <p>21 Q. Okay.</p> <p>22 A. In other words, I think we have a right</p> <p>23 to. I think we have a right as people who are part</p> <p>24 of the community to associate with others who share</p> <p>25 our faith positions. We have a right to choose</p>	<p style="text-align: right;">48</p> <p>1 find it to be exceptional.</p> <p>2 Q. Okay. So you're willing to testify to</p> <p>3 faith-based groups should be able to select their</p> <p>4 leaders because they believe as they do; correct?</p> <p>5 A. It only makes sense. Yes, sir.</p> <p>6 Q. All right. Are you willing to express an</p> <p>7 opinion that an African-American group may exclude</p> <p>8 non-African Americans as leaders under the same</p> <p>9 premise?</p> <p>10 MR. BLOMBERG: Objection; calls for</p> <p>11 speculation and legal conclusion.</p> <p>12 You may answer if you can.</p> <p>13 THE WITNESS: I would say that any group</p> <p>14 under various circumstances, like you indicated</p> <p>15 before in terms of sports teams, there's</p> <p>16 fraternities and sororities that discriminate on the</p> <p>17 basis of gender, there are a variety of reasons by</p> <p>18 which people discriminate without being</p> <p>19 discriminatory. It has to do with the purpose of</p> <p>20 the group. It has to do with the purpose of the</p> <p>21 entity.</p> <p>22 BY MR. CARROLL:</p> <p>23 Q. Okay.</p> <p>24 A. So I would be supportive, for example, if</p> <p>25 there was a group that formed on campus that wanted</p>
<p style="text-align: right;">47</p> <p>1 leaders that reflect that because it wouldn't make</p> <p>2 any sense to try and communicate the group's message</p> <p>3 or to enact its values if they did not. And our</p> <p>4 understanding of faith, the Judeo-Christian faith in</p> <p>5 particular, but I assume this is true of other</p> <p>6 faiths as well, that it has to do with the whole</p> <p>7 person. It's not something we separate out and</p> <p>8 leave off campus. It's part of our holistic growth</p> <p>9 and development. So if a person doesn't integrate</p> <p>10 their faith in their academics and their core values</p> <p>11 with things like that, then they're not really</p> <p>12 bringing themselves to the university. So part of</p> <p>13 the reason that I think this is important is because</p> <p>14 InterVarsity I think is a movement, and I in</p> <p>15 particular, I think the students really have a love</p> <p>16 of the university. We think it's an important</p> <p>17 community, an important institution, and we believe</p> <p>18 that we have something to offer. And I think if you</p> <p>19 looked at the record of InterVarsity Graduate</p> <p>20 Christian Fellowship, over the past 23 years we've</p> <p>21 been one of the most diverse, the most involved in</p> <p>22 reconciliation of all kinds, the most hospitable,</p> <p>23 and the most inclusive of all standing groups on</p> <p>24 campus. I can't demonstrate that empirically, but I</p> <p>25 think if you went back and looked over things you'd</p>	<p style="text-align: right;">49</p> <p>1 to be a group that was for African Americans, you</p> <p>2 know, making that a requirement of someone who would</p> <p>3 be in leadership with their group. But I can't say</p> <p>4 that in sort of a formal legal way but my general</p> <p>5 reaction is that I think there would be legitimacy</p> <p>6 to that.</p> <p>7 Q. Okay. Are you in any manner familiar with</p> <p>8 Veterans Preference laws?</p> <p>9 A. I'm not sure.</p> <p>10 Q. Okay. Are you aware of the fact that</p> <p>11 veterans are given employment preference because of</p> <p>12 their status?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. You understand that's</p> <p>15 discriminatory, correct?</p> <p>16 A. In the sense that there's an exception</p> <p>17 made for them?</p> <p>18 Q. Right.</p> <p>19 A. Mm-hmm.</p> <p>20 Q. Like I'm a veteran, you're not, we're</p> <p>21 equal, I'm going to get a bump over you because of</p> <p>22 Veterans Preference; correct?</p> <p>23 A. Mm-hmm.</p> <p>24 Q. You understand that?</p> <p>25 A. Mm-hmm.</p>

50

1 THE REPORTER: Yes?

2 THE WITNESS: Yes. Excuse me. Sorry.

3 BY MR. CARROLL:

4 Q. Do you understand that the law allows

5 that?

6 MR. BLOMBERG: Objection; calls for legal

7 conclusion.

8 You may answer if you can.

9 THE WITNESS: My assumption is yes.

10 BY MR. CARROLL:

11 Q. Okay. So do you understand there's a

12 distinction between lawful and unlawful

13 discrimination?

14 A. That makes sense.

15 Q. Okay. And with respect to, again, you

16 know, I don't want legal conclusions, but do you

17 believe the University of Iowa is -- just the policy

18 -- is unfairly applying it to InterVarsity?

19 A. Yes.

20 Q. And that's based on you want your leaders

21 to believe as they do?

22 A. Not just my leaders but any student group

23 that would be that way. I wouldn't want a Muslim

24 student group to be forced to be in a position to

25 put in leadership a non-Muslim. I wouldn't want,

51

1 you know, any group, because it's not just

2 dissemination against InterVarsity. It's

3 discrimination, I'm thinking, in terms of faith-

4 based groups because that's what InterVarsity is.

5 But yes.

6 Q. Okay. You understand that you're given

7 benefits from the University of Iowa by being a

8 registered student organization?

9 A. Yes.

10 MR. BLOMBERG: You can clarify what you

11 mean by "you"? Are you talking about Kevin or are

12 you talking about InterVarsity?

13 BY MR. CARROLL:

14 Q. InterVarsity.

15 A. I am aware of that. And I think my

16 student leaders are aware of that.

17 Q. Well, you get to use the Union rent-free

18 for the recruitment fair.

19 A. That's right.

20 Q. That's a public building; is it not?

21 A. It is.

22 Q. Do you understand that others have to pay

23 rent?

24 A. I do.

25 Q. Okay. You get to use the University of

52

1 Iowa website; correct?

2 A. Yes. When it's working.

3 Q. Yes. And it's a mass mailing that you can

4 use?

5 A. Yes.

6 Q. You understand that's on a University of

7 Iowa funded website?

8 A. Yes.

9 Q. Okay. So those two examples, those are

10 examples of the State of Iowa providing financial

11 benefit to InterVarsity; correct?

12 A. Correct.

13 Q. Okay.

14 A. Not that we -- not that we take much

15 advantage of the financial part. But in other

16 words, if you're talking about funds, but as far as

17 taking advantage of those sorts of things, yes.

18 Q. Okay. And if you wanted to have a meeting

19 on campus, like for example, you talked about the

20 dorm earlier, I assume you're meeting in -- not in a

21 dorm room. You're finding some conference room

22 within the dorm?

23 MR. BLOMBERG: Just to clarify, when we're

24 saying "you," we're talking about InterVarsity --

25 MR. CARROLL: Yeah, I'm sorry.

53

1 MR. BLOMBERG: -- this whole series.

2 MR. CARROLL: When I say you --

3 THE WITNESS: No, actually --

4 MR. BLOMBERG: Make sure you say yes or

5 no. We've got a couple mm-hmm, unh-unhs.

6 THE WITNESS: Right. Okay, sorry about

7 that. Yes.

8 MR. BLOMBERG: You're fine. You're fine.

9 THE WITNESS: No, the Graduate Christian

10 Fellowship doesn't have anybody who lives in the

11 dorms. We have not had any meetings in the dorms as

12 InterVarsity Graduate Fellowship for many years.

13 BY MR. CARROLL:

14 Q. I'm sorry; I thought earlier you said you

15 did go into dorms and had meetings.

16 A. No. I said I followed the policy that the

17 Association of Campus Ministers and the university

18 talk about about not going into dorms uninvited.

19 Q. Okay. You do agree, however, that

20 InterVarsity is, to whatever level, is taking

21 advantage of state-provided funds?

22 A. InterVarsity Graduate Christian Fellowship

23 is availing itself of resources that a state

24 university, which of course is funded by me and

25 other taxpayers and is therefore, us, offers. Yes.

<p style="text-align: right;">54</p> <p>1 It's a public university. Yes.</p> <p>2 Q. Okay. Do you agree that by taking</p> <p>3 advantage of state-provided funds you're subject to</p> <p>4 state regulations?</p> <p>5 MR. BLOMBERG: Objection; calls for legal</p> <p>6 conclusion.</p> <p>7 You may answer if you can.</p> <p>8 THE WITNESS: Yeah, I don't think I know</p> <p>9 how to answer that.</p> <p>10 BY MR. CARROLL:</p> <p>11 Q. Okay. Then if you would look to -- let's</p> <p>12 just keep going through this exhibit.</p> <p>13 A. The same one?</p> <p>14 Q. Yes.</p> <p>15 MR. BLOMBERG: And this is Exhibit 2?</p> <p>16 MR. CARROLL: Yes.</p> <p>17 BY MR. CARROLL:</p> <p>18 Q. Okay. So if you would just -- if you</p> <p>19 could look at the emails and see if you were</p> <p>20 directly involved in these.</p> <p>21 A. I was cc'd on one of these. And on this</p> <p>22 one.</p> <p>23 MR. BLOMBERG: When you say "this one,"</p> <p>24 you mean the --</p> <p>25 THE WITNESS: I'm sorry.</p>	<p style="text-align: right;">56</p> <p>1 not really respond to anything until I did get back.</p> <p>2 Q. Okay.</p> <p>3 A. Because when I'm on vacation I attempt to</p> <p>4 not.</p> <p>5 Q. Were you -- excuse me.</p> <p>6 At some point you -- or I'll ask you --</p> <p>7 did you come to the understanding that the</p> <p>8 University of Iowa deregistered InterVarsity?</p> <p>9 A. Oh, yes.</p> <p>10 Q. How did you become aware of that?</p> <p>11 A. Once I got back I did hear about this from</p> <p>12 my student leaders and others. And then, of course,</p> <p>13 I became aware because the university falsely put on</p> <p>14 the webpage that we had been -- what was it,</p> <p>15 derecognized due to lack of interest. I can't</p> <p>16 remember the exact wording here. It's in mine there</p> <p>17 but that was astonishing to look at that since we</p> <p>18 had never requested to be taken off, which is the</p> <p>19 way the language was.</p> <p>20 Q. And you're saying you saw that on a</p> <p>21 university website?</p> <p>22 A. Mm-hmm.</p> <p>23 Q. Okay.</p> <p>24 A. I went to go on our OrgSync page and I</p> <p>25 couldn't get into it even though I'm an</p>
<p style="text-align: right;">55</p> <p>1 MR. BLOMBERG: -- June 12th at 11:25 a.m.</p> <p>2 email?</p> <p>3 THE WITNESS: Let me take a look back</p> <p>4 here. It looks like I'm cc'd --</p> <p>5 BY MR. CARROLL:</p> <p>6 Q. You should have a page number at the top,</p> <p>7 so if you can use it that way, that would be</p> <p>8 helpful.</p> <p>9 A. I am cc'd on page two at the top.</p> <p>10 Q. And is this the time period you're still</p> <p>11 on vacation?</p> <p>12 A. Mm-hmm. Mm-hmm.</p> <p>13 Q. Yes?</p> <p>14 A. Yes. Forgive me for continuing to say mm-</p> <p>15 hmm. Yes.</p> <p>16 Q. Okay.</p> <p>17 A. Yes. There are a couple of these and it</p> <p>18 looks like not every single one, but perhaps most of</p> <p>19 them I am cc'd, which is not unusual. I get things</p> <p>20 as the advisor to this group, and I've gotten things</p> <p>21 as advisor, you know, when I've been advisor to</p> <p>22 other groups in the past. I don't see myself on</p> <p>23 every single one but on a number of these. I was</p> <p>24 not back in the country during any of the time that</p> <p>25 these particular emails are listed here and I did</p>	<p style="text-align: right;">57</p> <p>1 administrator because it said this group, you know,</p> <p>2 had been, again, I don't remember the exact</p> <p>3 language, but removed by their request due to lack</p> <p>4 of interest. And I was already, at that point,</p> <p>5 aware of kind of the email exchange. And so I</p> <p>6 wouldn't have been surprised to find an indication</p> <p>7 that the group had been derecognized or was going to</p> <p>8 be derecognized. I was very surprised to find that</p> <p>9 the university had the either audacity or the</p> <p>10 incompetence to say that we had requested it due to</p> <p>11 lack of interest.</p> <p>12 Q. Do you know who put that website up,</p> <p>13 specifically?</p> <p>14 A. I don't, specifically, no.</p> <p>15 Q. Okay. Do you know Mr. Kutcher?</p> <p>16 A. As I mentioned before, I met him this</p> <p>17 year. I had seen his name prior to that.</p> <p>18 Q. Have you ever asked anybody at the</p> <p>19 University of Iowa why the website appeared to be</p> <p>20 incorrect under your understanding?</p> <p>21 A. I have not because by the time I got back,</p> <p>22 litigation had begun and I was encouraged not to</p> <p>23 talk about the case with people.</p> <p>24 Q. Okay. Are you familiar with, apart from</p> <p>25 this website which you're calling either --</p>

58

1 A. It was OrgSync –
 2 Q. – intentional or incompetence, I mean,
 3 that seems to be what you said.
 4 A. Okay. We'll just say false.
 5 Q. Okay. Was it your understanding that the
 6 University of Iowa told InterVarsity you've got to
 7 change your leadership selection criteria to become
 8 compliant with the University of Iowa human rights
 9 policy?
 10 A. Yes.
 11 Q. Okay.
 12 A. By that time.
 13 Q. And by that time means?
 14 A. Late June.
 15 Q. Okay. And you, as we speak this morning,
 16 you fundamentally disagree with the ability of the
 17 University of Iowa to make that direction; is that
 18 fair?
 19 A. Yes.
 20 Q. So despite the website issue, at least as
 21 of late June you – you, personally, as a leader or
 22 advisor of InterVarsity – fully understood the
 23 University of Iowa's position; correct?
 24 A. Fully is far too strong a word but I
 25 generally understood what was going on.

59

1 Q. Okay. And I don't want to put words in
 2 your mouth. You understood the University of Iowa
 3 said if you don't get in line completely with the
 4 human rights policy you will be deregistered?
 5 A. That's not how I understood it to be put.
 6 I understood, and you'll be doing a deposition with
 7 Karina next, but I understood it to be that the
 8 initial email that I saw earlier in the month had to
 9 do with making sure that the human rights statement
 10 was in our constitution and that we could agree with
 11 that, which we did, and that Katrina was informed
 12 that that was not enough. That we also – there was
 13 a problem with our leadership selection process, and
 14 I'll let Katrina speak for herself in the deposition
 15 as to what went on with that. So I was aware of
 16 some of those things, yes.
 17 Q. Okay. And other than your attorneys –
 18 your, being InterVarsity's attorneys – who did you
 19 talk to about today's deposition?
 20 A. I asked for prayer from my prayer team,
 21 although I didn't talk about it. I just simply said
 22 that there was going to be a deposition today that
 23 had to do with the ongoing legal case with
 24 InterVarsity and the University of Iowa, and I also
 25 shared with the Association of Campus Ministers that

60

1 I wasn't going to be there today because of that,
 2 and also, I asked for prayer there. That's the
 3 extent that I'm aware of.
 4 Q. Okay.
 5 A. Not including my wife.
 6 Q. And then did you talk to Katrina at all
 7 about the deposition, other than the fact that it
 8 was occurring?
 9 A. Other than the fact that we both have had
 10 access to our lawyers, but other than that, not.
 11 You know, over time but I'm not sure if you want to
 12 clarify when you're asking me about.
 13 Q. I'm asking more immediate, to prepare for
 14 today.
 15 A. Yeah.
 16 Q. So I don't want anything that your lawyers
 17 told you or even what documents they showed you.
 18 But for example, other than prayer through your
 19 groups or talking with your wife, which I won't ask
 20 about, did you sit down with anybody, or by phone,
 21 by email, and say, hey, I think they're going to ask
 22 me this?
 23 A. No.
 24 Q. Now, do – you fully appreciate that,
 25 well, one, I represent the University of Iowa;

61

1 right?
 2 A. Mm-hmm.
 3 Q. Yes?
 4 A. Yes. Sorry.
 5 Q. Do you also fully appreciate the fact that
 6 I have the right to ask these questions?
 7 A. Yes.
 8 Q. Okay. I think I'll take a short break.
 9 A. Okay.
 10 THE REPORTER: We're off the record.
 11 (WHEREUPON, a brief recess was taken.)
 12 THE REPORTER: We're on the record.
 13 BY MR. CARROLL:
 14 Q. All right. Thank you.
 15 Mr. Kummer, I just have really maybe one
 16 or two questions.
 17 Are you, and if you don't know, that's
 18 fine, are you aware that there's an Iowa Civil
 19 Rights Statute?
 20 A. Yes.
 21 Q. Okay. Are you aware that it prohibits
 22 dissemination by state entities, including our
 23 public institutions?
 24 A. Yes.
 25 Q. Are you aware it prohibits dissemination

<p style="text-align: right;">62</p> <p>1 based on religion and creed?</p> <p>2 MR. BLOMBERG: Calls for legal conclusion.</p> <p>3 You may answer if you can.</p> <p>4 THE WITNESS: From what I understand.</p> <p>5 MR. CARROLL: Okay. Thank you. I have no</p> <p>6 further questions.</p> <p>7 MR. BLOMBERG: Just briefly on redirect.</p> <p>8 EXAMINATION</p> <p>9 BY MR. BLOMBERG:</p> <p>10 Q. Mr. – Mr. Kummer, can you tell us about</p> <p>11 the impact that this has had on – the derecognition</p> <p>12 process had on InterVarsity?</p> <p>13 A. Yes. For one thing it's taken a good big</p> <p>14 of time. I know for InterVarsity staff, we do a</p> <p>15 conservative estimate of 40-plus hours that have</p> <p>16 been involved in working in some way or another on</p> <p>17 this case. With graduate students, graduate</p> <p>18 students are awfully busy year-round and have a very</p> <p>19 thin window of opportunity, so it's taken a good bit</p> <p>20 of time for Katrina and at least one other of our</p> <p>21 leaders as well. During the summer in particular,</p> <p>22 and that came at a time when it was an important</p> <p>23 time for the group to be planning for the fall, so</p> <p>24 it had a negative impact on the time and energy</p> <p>25 available for that. Also, again, the word actually</p>	<p style="text-align: right;">64</p> <p>1 Another person also, in particular, is quite</p> <p>2 concerned about what this – the derecognition and</p> <p>3 the whole situation will have an impact on her. So</p> <p>4 we've got some frightened students. We've got</p> <p>5 smaller numbers. We've got a smaller leadership</p> <p>6 pool to draw from. We had fewer opportunities to</p> <p>7 publicize, and it's been emotionally a wearing</p> <p>8 process on all of us that have been involved in it.</p> <p>9 Q. When you said that there was a significant</p> <p>10 drop off in numbers, did you mean numbers of</p> <p>11 members?</p> <p>12 A. People who are regularly involved in the</p> <p>13 group. Yes. And attending some of our large group</p> <p>14 events. So in the past we averaged – there was an</p> <p>15 average membership of people regularly involved in</p> <p>16 the group, usually mid to upper 30s. We've got</p> <p>17 about 21 now that are regularly involved.</p> <p>18 Q. And then you mentioned that there were</p> <p>19 about 40 hours for InterVarsity national staff. Was</p> <p>20 that just – is that a part of the entire lawsuit or</p> <p>21 is that before the lawsuit and part of the process</p> <p>22 of trying to be reregistered?</p> <p>23 A. That was before the lawsuit. It certainly</p> <p>24 is more hours, many more hours since the lawsuit.</p> <p>25 MR. BLOMBERG: No further questions.</p>
<p style="text-align: right;">63</p> <p>1 defunct was the one that appeared on the OrgSync</p> <p>2 page, was one that I think had a very negative</p> <p>3 impact in that people who would have visited it who</p> <p>4 were coming in would have thought the group had –</p> <p>5 was defunct, and by choice. I think it probably had</p> <p>6 a negative impact also on people who had heard about</p> <p>7 the case because they didn't really understand what</p> <p>8 was being, you know, challenged, and there was</p> <p>9 uncertainty about it. So it affected the group's</p> <p>10 ability both to conduct its summer gatherings, to</p> <p>11 prepare for the fall, the uncertainty about</p> <p>12 recognition or derecognition meant that we were not</p> <p>13 really able to publicize the way we normally would</p> <p>14 have been able to. We've had a drop off in numbers</p> <p>15 this year that's been more significant than at any</p> <p>16 other time in my 22 years here. I would not be</p> <p>17 surprised if that was in part a result of this case</p> <p>18 and this situation, the derecognition. Also, in a</p> <p>19 couple of students' cases, in particular, there's</p> <p>20 quite a bit of anxiety about negative impact on them</p> <p>21 from the university academically in terms of career</p> <p>22 choices. One of them in particular is fairly</p> <p>23 terrified. Doesn't want to have her/his name</p> <p>24 associated with this in any way because she/he is</p> <p>25 terrified of retaliation within the university.</p>	<p style="text-align: right;">65</p> <p>1 MR. CARROLL: Mr. Kummer, I do have a</p> <p>2 follow up.</p> <p>3 FURTHER EXAMINATION</p> <p>4 BY MR. CARROLL:</p> <p>5 Q. You're aware that InterVarsity Group sued</p> <p>6 the University of Iowa?</p> <p>7 A. Yes.</p> <p>8 MR. CARROLL: Okay. Will you mark this as</p> <p>9 – I guess it would be Exhibit 3?</p> <p>10 THE REPORTER: Exhibit 3 is marked.</p> <p>11 (WHEREUPON, Exh bit 3 was marked for</p> <p>12 identification.)</p> <p>13 BY MR. CARROLL:</p> <p>14 Q. Will you look at Exhibit 3, please?</p> <p>15 A. Mm-hmm.</p> <p>16 Q. Are you familiar with it?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. You indicated that the impact on</p> <p>19 InterVarsity – was InterVarsity required to sue the</p> <p>20 University of Iowa?</p> <p>21 A. I can't speak for the decisions of the</p> <p>22 group as a whole. I mean, as InterVarsity</p> <p>23 nationally. That was not something that they asked</p> <p>24 me about.</p> <p>25 Q. Okay.</p>

66

1 A. So I – I really can't answer that.

2 Q. Will you read the individual names that

3 are being sued by InterVarsity out loud?

4 A. That's on this side, right?

5 Q. Yes.

6 A. Let's see. Bruce Harreld.

7 Q. Who is Mr. Harreld?

8 A. He's the president of the University of

9 Iowa and someone I've come to know and enjoy.

10 Q. Okay. Do you understand that Mr. Harreld

11 has been named individually by InterVarsity?

12 A. I do.

13 Q. Do you believe that he is spending time

14 and effort defending his good name?

15 A. I have no idea.

16 Q. Okay.

17 A. I do know --

18 Q. You have no idea?

19 A. I have no idea what he's doing as far as

20 his time and effort. I see him from time to time.

21 I sing in a prison choir that he often attends, he

22 and his wife, and have been at several events at

23 Bethel AME Church that he's attended. So we know

24 each other and interact some.

25 Q. Would it surprise you he's spending time

67

1 and effort on this lawsuit?

2 MR. BLOMBERG: Objection, calls for

3 speculation.

4 You may answer if you can.

5 THE WITNESS: I don't know how to answer

6 that.

7 BY MR. CARROLL:

8 Q. Okay. Would you read the next

9 individual's name?

10 A. Melissa Shivers.

11 Q. Okay. You understand she's being sued

12 personally?

13 A. Yes.

14 Q. Okay. Do you believe Ms. Melissa Shivers

15 is spending time and effort to defend her name?

16 A. I know she's taking some time and effort

17 on this case.

18 Q. Okay. And the next name?

19 A. William Nelson.

20 Q. Mr. Nelson is being sued in his individual

21 capacity?

22 A. I'm aware of that.

23 Q. Do you believe that Mr. Nelson is spending

24 his time and effort to defend this lawsuit?

25 A. I assume he has.

68

1 Q. Okay. And what's the next name?

2 A. Andrew Kutcher.

3 Q. Okay. Same questions for the next two

4 names.

5 A. Yeah. Again, my assumption would be that

6 it's taking some of their time. And also for Thomas

7 Baker.

8 Q. Okay.

9 A. Although I don't know Thomas Baker at all.

10 Q. Okay. Thank you. I have no further

11 questions.

12 A. Okay.

13 THE REPORTER: We're off the record.

14 (WHEREUPON, at 9:14 a.m., the deposition

15 of KEVIN KUMMER concluded.)

16

17

18

19

20

21

22

23

24

25

69

1 CERTIFICATE

2

3 I, Ryan Batterson, do hereby certify that I reported

4 all proceedings adduced in the foregoing matter and that

5 the foregoing transcript pages constitutes a full, true,

6 and accurate record of said proceedings to the best of

7 my ability.

8

9 I further certify that I am neither related to

10 counsel or any part to the proceedings nor have any

11 interest in the outcome of the proceedings.

12

13 IN WITNESS HEREOF, I have hereunto set my hand this

14 4th day of April, 2019.

15

16

17

18

19

20 /S/ Ryan Batterson

21

22

23

24

25

70

1 Date: April 4, 2019 Assignment #: 29698-2
 2 Attorney: Daniel Blomberg, Esquire
 3 Deponent: Kevin Kummer
 4 Case: Intersivity Christian vs. University of Iowa
 5
 6 ATTORNEY - TRANSCRIPT ENCLOSED: Signature of your
 client
 7 is required. Please have your client make any corrections
 8 necessary. Sign the Correction Sheet where indicated.
 9 Forward a COPY of the executed Correction Sheet directly
 10 to the attorney(s) listed below. (The Address(es) can be
 11 found on the Appearance page of the deposition.) Also,
 12 send a COPY of the executed Correction Sheet to our
 13 corporation.
 14
 15
 16
 17
 18
 19
 20
 21 CC: Naegeli Deposition & Trial
 22 George Carroll, Esquire
 23
 24
 25

72

1 DECLARATION
 2 Deposition of: Kevin Kummer Date: 03/28/19
 3 Regarding: Intersivity Christian vs. U of Iowa
 4 Reporter: Batterson/Morrison
 5 _____
 6
 7 I declare under penalty of perjury the following to
 8 be true:
 9
 10 I have read my deposition and the same is true and
 11 accurate save and except for any corrections as made
 12 by me on the Correction Page herein.
 13
 14 Signed at _____,
 15 on the _____ day of _____, 2019.
 16
 17
 18
 19
 20
 21
 22
 23
 24 Signature _____
 25 Kevin Kummer

71

1 CORRECTION SHEET
 2 Deposition of: Kevin Kummer Date: 03/28/19
 3 Regarding: Intersivity Christian vs. U of Iowa
 4 Reporter: Batterson/Morrison
 5 _____
 6 Please make all corrections, changes or clarifications
 7 to your testimony on this sheet, showing page and line
 8 number. If there are no changes, write "none" across
 9 the page. Sign this sheet on the line provided.
 10 Page Line Reason for Change
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 _____
 20 _____
 21 _____
 22 _____
 23 _____
 24 Signature _____
 25 Kevin Kummer

Blank area for corrections or additional notes.

<p style="text-align: center;"><u>1</u></p> <p>1 13:4 13:6 13:8 13:9 13:16 31:5 32:5</p> <p>10 27:1</p> <p>11:25 55:1</p> <p>12th 55:1</p> <p>1965 42:11 42:20</p> <p>1st 16:8 34:8</p> <hr/> <p style="text-align: center;"><u>2</u></p> <p>2 13:11 35:14 35:15 35:16 35:20 54:15</p> <p>2018 16:10 16:13 36:17 43:18</p> <p>2018-2019 36:8</p> <p>2019 6:4</p> <p>20th 37:17</p> <p>21 40:4 64:17</p> <p>21-6 30:25</p> <p>22 17:18 39:14 41:12 44:22 63:16</p> <p>23 47:20</p> <p>28 6:4</p> <p>2nd 34:8</p> <hr/> <p style="text-align: center;"><u>3</u></p> <p>3 65:9 65:10 65:11 65:14</p> <p>30s 64:16</p>	<p style="text-align: center;"><u>4</u></p> <p>40 41:4 64:19</p> <p>40-plus 62:15</p> <p>40th 17:1</p> <hr/> <p style="text-align: center;"><u>5</u></p> <p>500 25:15 40:22</p> <hr/> <p style="text-align: center;"><u>8</u></p> <p>8:02 6:5</p> <hr/> <p style="text-align: center;"><u>9</u></p> <p>9/11 25:2</p> <p>9:14 68:14</p> <hr/> <p style="text-align: center;"><u>A</u></p> <p>a.m 6:5 55:1 68:14</p> <p>ability 58:16 63:10</p> <p>able 19:5 22:1 31:11 46:13 48:3 63:13 63:14</p> <p>Absolutely 34:24 42:25</p> <p>absurd 28:16 28:16</p> <p>academic 14:24</p> <p>academically 63:21</p> <p>academics 47:10</p> <p>access 60:10</p>	<p>achieve 21:20</p> <p>across 9:18 45:9</p> <p>actually 15:9 16:15 29:21 31:17 33:23 44:18 53:3 62:25</p> <p>add 9:7</p> <p>administratio n 10:13 36:22</p> <p>administrator 57:1</p> <p>advantage 52:15 52:17 53:21 54:3</p> <p>advisor 19:24 20:1 55:20 55:21 55:21 58:22</p> <p>advisory 34:19</p> <p>advocacy 15:6</p> <p>affected 63:9</p> <p>affiliated 16:25</p> <p>affirm 23:13</p> <p>affirmation 39:8</p> <p>affirming 26:6</p> <p>African 45:20 49:1</p> <p>African- American 27:8</p>	<p>45:19 48:7</p> <p>African- Americans 42:24</p> <p>against 17:9 23:14 23:20 28:21 30:5 30:8 30:14 30:15 42:4 42:24 51:2</p> <p>age 12:3</p> <p>agreement 46:14</p> <p>ahead 43:3</p> <p>alcohol 11:23</p> <p>allow 41:9</p> <p>allowed 30:16 32:8 46:2</p> <p>allows 46:6 50:4</p> <p>alluding 15:22</p> <p>already 57:4</p> <p>am 21:24 31:1 51:15 55:9 55:19</p> <p>AME 66:23</p> <p>America 42:12</p> <p>American 45:21</p> <p>Americans 48:8 49:1</p> <p>Andrew 36:4 68:2</p> <p>Andy 37:6</p>
--	---	---	---

anniversary 25:5	60:24 61:5	28:8	65:5 67:22
answer 7:6 17:7 18:8 20:5 21:10 26:15 26:20 28:14 41:18 42:17 43:24 45:24 45:25 48:12 50:8 54:7 54:9 62:3 66:1 67:4 67:5	appropriate 36:15	attempt 20:19 28:5 56:3	away 35:22
anti- intellectua l 23:17	approximately 40:22	attempting 46:20	awfully 62:18
anxiety 63:20	area 8:21	attended 66:23	<hr/> B <hr/>
anybody 23:22 53:10 57:18 60:20	aren't 21:11 25:20	attending 64:13	bad 31:18
anymore 41:15	arise 39:17	attends 66:21	Baker 68:7 68:9
Anyone 19:3	articulation 9:19	attentiveness 12:12	Barach 24:21
anything 29:9 39:4 56:1 60:16	aside 20:12	attitude 23:17	based 14:11 17:9 24:17 26:21 26:22 42:13 44:16 46:3 46:6 46:12 46:14 50:20 51:4 62:1
Anyway 30:25	aspect 14:4	attorney 6:18	basically 9:3 10:19
apart 57:24	associate 46:24	attorneys 59:17 59:18	basis 14:6 18:1 20:24 22:8 25:23 25:24 41:2 48:17
appeared 44:21 57:19 63:1	associated 25:10 63:24	audacity 57:9	basketball 31:12 32:21
application 40:3	association 10:10 14:16 24:6 24:8 25:3 25:10 53:17 59:25	authority 20:1	BAXTER 13:1
apply 45:9	assume 9:16 31:25 47:5 52:20 67:25	available 62:25	beat 32:19
applying 41:21 50:18	assumption 50:9 68:5	availing 53:23	became 25:25 37:25 41:1 56:13
appreciate 43:5	astonishing 56:17	average 64:15	become 38:25 56:10 58:7
	atheist 18:22 19:12 19:17 30:17	averaged 64:14	beginning 9:21 34:1
	atheists 19:14	aware 25:15 38:25 40:11 40:13 40:18 40:20 49:10 51:15 51:16 56:10 56:13 57:5 59:15 60:3 61:18 61:21 61:25	
	atmosphere		

34:4	46:4	24:18 24:20	categories
begun 57:22	48:10	25:3 25:9	22:2
beliefs 17:19	50:6	25:10 25:13	Catholics
18:24	51:10 52:23	47:8	8:18
46:3 46:12	53:1 53:4	47:24 48:25	cc'd 54:21
believe 17:14	53:8 54:5	52:19 53:17	55:4 55:9
18:2 19:9	54:15 54:23	59:25	55:19
29:21	55:1 62:2	capacity	center 8:16
32:7	62:7 62:9	67:21	8:19 30:3
46:11 46:13	64:25 67:2	career 63:21	certain 30:8
47:17	boundaries	CARROLL	certainly
48:4	29:18	6:10 13:5	33:3
50:17 50:21	breadth 25:11	13:11 13:14	35:10
66:13 67:14	break 61:8	17:11 18:11	40:4 64:23
67:23	brief 61:11	26:19 28:25	cetera
believers	briefly	31:2	12:17 30:17
22:18	8:23 62:7	35:18 37:21	challenged
benefit 52:11	bringing	38:1	63:8
benefits 51:7	47:12	38:10 41:22	change
Besides 33:17	broad 42:11	42:19	33:16 43:14
Bethel 66:23	broadened	43:7 44:2	44:5 44:6
better 20:16	27:4	46:1 46:7	44:7
beyond 34:10	Bruce 66:6	46:10 48:22	44:11 44:22
bill 15:3	building	50:3	44:24 44:24
15:6 15:9	51:20	50:10 51:13	58:7
bit 37:15	buildings	52:25	changed
62:19 63:20	11:4	53:2	27:3 41:4
blank 18:21	bump 49:21	53:13 54:10	changes 44:8
Blink 40:10	business	54:16 54:17	chapter 36:9
40:14 45:11	34:14	55:5	character 9:3
BLOMBERG 13:3	busy 62:18	61:13	9:22 27:3
17:5 18:6	_____	62:5 65:1	check 16:15
26:12 28:12	C	65:4 65:8	checking
30:21 37:18	campus 7:17	65:13 67:7	33:23
37:23	8:19 8:21	case 18:17	35:9 35:11
38:8	10:10 10:12	35:6 44:6	choice 63:5
41:16 42:15	10:16 14:16	45:12 57:23	choices 63:22
43:22 45:22	24:7	59:23 62:17	
		63:7	
		63:17 67:17	
		cases 63:19	

choir 66:21	clearly 36:23	30:1 30:2	28:10
choose 41:1	closely 31:22	30:10	connection
46:2 46:25	co-ed 31:19	45:6	10:3 24:16
Christ 9:3	32:5	46:24 47:17	consensus
9:22	coffee 8:20	completely	20:25
Christian	color 14:7	59:3	21:2 21:16
7:18 7:20	18:1 22:6	compliance	conservative
17:20 18:20	25:19 25:19	16:2	62:15
19:18	25:21 25:25	compliant	consider
23:1 23:2	26:3 26:5	16:19 39:24	19:23
23:4 30:6	26:8	40:16 58:8	30:4 30:14
36:9 39:8	26:11 26:13	complies 17:8	considered
40:7 41:6	26:17 26:24	comply 17:3	7:17
46:16 47:20	27:4	component	constitution
53:9 53:22	27:13 27:14	13:24	12:11 16:19
Christians	27:21 27:22	components	16:23 17:18
19:8 40:8	28:3 28:6	42:6	33:16 38:17
Church 66:23	28:17 28:20	concept 31:8	39:23 59:10
circumstances	28:23 45:20	concerned	constitutions
48:14	colors 27:5	64:2	16:1
City 8:1	coming	concerns	contact 36:18
Civil 61:18	34:17	14:19	38:20
clarification	37:9 63:4	21:6 25:7	continuing
24:2	comments	concluded	55:14
clarify 37:18	45:15	68:15	convenient
45:17 51:10	commitment	conclusion	12:25
52:23 60:12	42:4 45:5	17:6 18:7	copy 13:6
clause	commitments	28:13 41:17	core 17:19
13:24	18:20	42:16 43:23	18:24 47:10
17:4 17:8	committee	45:23 48:11	corporate
17:13 17:23	20:10	50:7 54:6	7:22
18:5	communicate	62:2	correct
18:10 18:14	47:2	conclusions	22:4 22:5
22:3	communities	50:16	39:18
28:11	9:1 9:20	conduct 63:10	46:3 48:4
39:6 39:7	9:21	conference	49:15 49:22
42:2	community	52:21	52:1
cleaned 38:17	17:20 18:18	conflict	52:11 52:12
	24:20 29:25		

58:23	34:17 34:17	38:3 59:6	difficult 7:3
counting	deadline	59:14 59:19	direction
13:20	38:16 38:21	59:22	58:17
country 9:2	debate 32:4	60:7 68:14	directly
33:18 33:20	decided 40:14	derecognition	24:13 34:25
34:11 55:24	decision	62:11 63:12	35:1 35:8
couple 6:19	26:22 28:19	63:18 64:2	54:20
14:20	decisions	derecognize	disagree 31:7
53:5	20:2	44:16	58:16
55:17 63:19	29:12 29:13	derecognized	disallows
course	65:21	44:15 56:15	45:4
53:24 56:12	declaration	57:7 57:8	discriminate
court 6:19	38:8 38:9	deregistered	17:9
7:7	deeply	56:8 59:4	17:24
cover 42:12	31:10 31:20	described	22:4 22:8
create 9:14	defend	21:21	28:18 28:19
creed 14:6	67:15 67:24	designated	29:19 48:16
14:11	defending	22:19	48:18
18:1	66:14	designed	discriminated
22:11 42:13	defined 27:22	25:24	30:5 30:8
62:1	definition	despite 41:12	30:14 30:15
criteria 17:3	27:4 29:2	58:20	discriminates
58:7	defunct	develop 9:1	23:14 28:21
cultural	63:1 63:5	developed	42:4
12:17	degree 21:22	9:25	discriminatin
culture 9:7	demonstrate	developing	g 23:20
28:8	46:8 47:24	9:4	29:8
current	department	development	29:10 29:11
7:15	14:21	47:9	29:15
19:21 20:6	depending	dialogue	discriminatio
<hr/>	27:22 28:18	38:25	n 14:11
D	depends	difference	26:21
<hr/>	18:9	14:5 17:25	29:3 29:6
date 16:5	18:13 27:16	different	29:7
16:7	29:5	21:24 25:17	29:15
dated 34:7	deposition	29:19	33:3 42:8
daughters	6:1 6:15	37:9 40:4	42:13 42:24
27:13			43:10 45:15
day 8:15			50:13 51:3
			discriminatio

ns 23:18	dorms 10:17	16:21	49:21
23:19 41:25	12:3	34:9 36:3	establish 9:1
discriminator	53:11 53:11	36:15 37:12	estimate
y 44:1 44:7	53:15 53:18	37:19 37:20	62:15
44:13 44:25	doubt 37:2	38:15	et 12:17
45:3	37:5	55:2 57:5	30:17
48:19 49:15	Dr 14:17	59:8 60:21	ethical 31:10
discussed	draw 64:6	emails	ethnic 12:16
21:17	drop 63:14	33:23	ethnicity 9:7
discussion	64:10	35:9	event 30:7
20:3	due 56:15	35:11	events 25:2
dishonor	57:3 57:10	37:3	25:7
29:17	duly 6:7	54:19 55:25	64:14 66:22
dissemination	during 9:25	emotionally	Everybody
51:2	55:24 62:21	64:7	29:12
61:22 61:25		empirically	everything
distinction	<hr/> E <hr/>	47:24	6:20
22:14	earlier 17:15	employed 40:3	exact 56:16
33:2	21:21 33:22	employer 7:19	57:2
39:12 50:12	52:20 53:14	employment	EXAMINATION
distinctions	59:8	7:15 10:2	6:9 62:8
32:23 32:23	eating 29:9	42:7 49:11	65:3
33:1	29:10	enact 47:3	examined 6:8
diverse 47:21	effort	encouraged	example
diversities	66:14 66:20	57:22	11:1 11:8
9:8	67:1	encouraging	11:19 11:23
Division 31:5	67:15 67:16	15:8	12:1 12:6
32:5	67:24	energy 62:24	22:3
documents	eight 42:22	enjoy 66:9	24:11 24:20
38:2 60:17	either 25:8	enter 23:7	25:18 34:20
dominate	57:9 57:25	entire	45:18 48:24
32:10	elaborate	37:20 64:20	52:19 60:18
done 43:15	42:9	entities	examples 52:9
dorm 52:20	eligible 19:1	61:22	52:10
52:21 52:22	19:3	entity	exception
dormitory	email 14:23	10:12 48:21	49:16
11:2 11:8	15:7	equal 33:6	exceptional
11:19 11:24	16:11 16:16		

48:1	39:7 40:7	30:1 39:8	federal 43:9
exchange 57:5	experience	41:7	feel 30:5
exclude 25:20	26:4 29:3	44:16	30:7 30:13
48:7	experiences	45:4 45:6	Fellowship
excluded 27:6	30:11 36:21	46:6	7:18 7:20
27:15 27:16	explain	46:16 46:25	36:10 47:20
27:17 28:24	42:2 44:10	47:4 47:4	53:10 53:12
30:8	explained	47:10 51:3	53:22
excludes 21:2	17:15	faith-based	fewer 64:6
exclusively	express 48:6	18:18	field 9:18
32:18	extent 18:6	23:1 23:2	32:12 32:14
excuse 15:1	43:23 60:3	45:16 48:3	32:24
19:15 20:17		faiths 47:6	filed 38:12
50:2 56:5	<hr/> F <hr/>	fall 34:21	fill 18:21
exercise	facilitate	62:23 63:11	financial
22:17	25:4	false 58:4	52:10 52:15
exhibit	fact 14:25	falsely 56:13	finding
13:4 13:6	15:24	familiar	26:5 52:21
13:8 13:9	26:2 27:1	10:23 10:24	fine 8:5 53:8
13:11 13:16	27:13	10:25	53:8 61:18
13:17	31:3	12:6 12:9	finish 7:5
16:4	31:17	14:2	43:1
35:13 35:14	33:4	14:13 14:15	finished
35:15 35:16	37:16 38:23	14:25 15:12	35:21
35:20 54:12	38:24 40:18	15:13 15:19	first 6:7
54:15	40:20 49:10	15:21 25:11	25:5
65:9	60:7 60:9	31:3	35:23 36:20
65:10 65:11	61:5	32:12	37:21
65:14	faculty 9:2	33:4 37:3	folks 14:21
exist 29:21	fair 21:19	37:12 37:14	27:7
30:4 42:20	24:16 32:24	37:25	forced 50:24
expanded	34:21	40:9	Forgive 55:14
27:11	35:2	40:11	formal 49:4
expectation	40:25 43:18	42:5 42:7	formed 27:9
41:5	43:25	49:7	48:25
expected	44:5	57:24 65:16	forth 33:15
17:19	51:18 58:18	fan 31:1	forward
expecting	fairly 63:22	fast 32:19	
	faith 18:20	faster 32:1	
		32:15	

41:9	43:13 49:4	27:9 28:7	
41:14 43:20	generally	28:10 28:17	<u>H</u>
44:24	21:1	28:19 30:16	Halal 30:11
fraternities	42:18 58:25	40:7 41:6	half 33:21
48:16	George 37:18	45:19	Harreld
Freedom 15:2	given 49:11	46:2	66:6 66:7
frightened	51:6	46:11 46:13	66:10
64:4	giving 9:22	48:7	haven't
fulfill 26:2	God 9:5	48:13 48:20	31:9 31:19
full 6:11 8:7	God's 9:5 9:6	48:25	having 6:7
8:8	9:8 29:23	49:1 49:3	9:4 39:21
fully 27:12	gotten 55:20	50:22 50:24	39:23
58:22 58:24	governor 15:2	51:1	head 34:8
60:24 61:5	graciousness	55:20	headquarters
function	12:20	57:1 57:7	7:22
24:25	grad 21:23	62:23	healthfully
functions	26:3	63:4	29:10
24:1	graduate 36:9	64:13 64:13	hear 56:11
fundamentally	36:13 47:19	64:16	heard 28:5
58:16	53:9	65:5 65:22	63:6
funded 52:7	53:12 53:22	groups	help 25:3
53:24	62:17 62:17	10:15 10:16	helpful 55:8
funding 33:6	granted 11:15	18:25 25:16	her/his 63:23
funds 52:16	great 21:8	28:3	here's 13:6
53:21 54:3	group 11:9	29:14 40:19	herself 59:14
	11:9	40:21 40:23	he's 66:8
<u>G</u>	19:12 19:13	44:12 44:16	66:19 66:23
gather	19:18 19:23	45:9	66:25
26:24 28:4	20:11	47:23	hey 60:21
gatherings	21:5	48:3 51:4	hire 23:12
63:10	22:17 23:24	55:22 60:19	23:16
geared 40:19	24:12 24:13	group's	Hispanic 27:6
gender 48:17	25:9	47:2 63:9	Historical
general	25:18 25:18	growing 9:5	24:12
20:7	25:20 25:24	9:5 9:6	historically
31:13 32:15	26:3 26:4	growth 47:8	27:10 42:23
32:17 39:8	26:13 26:17	guess 32:6	
	26:23 26:25	36:23 65:9	
		guidelines	
		31:4	

history 41:12	29:6	63:20	18:25 24:14
hmm 55:15	35:19 38:17	64:3 65:18	individual's
hold 11:8	46:8 56:6	implications	67:9
holistic 47:8	59:14 61:8	31:10	information
home 8:13	I'm 6:17	important	14:19
hospitable	7:7 7:17	47:13 47:16	informed
47:22	9:22	47:17 62:22	59:11
hospitality	10:24 10:24	IMU 14:18	initial
12:18	10:24 13:15	34:23	34:3 59:8
hours 62:15	13:20 15:21	include 12:10	input 9:18
64:19 64:24	18:3	12:11 27:5	19:22 20:23
64:24	18:12 19:25	included	20:24 21:16
house 8:20	24:6	11:16 30:10	instance
housed 8:10	25:14 27:12	30:12 40:20	23:22
huh 37:1	27:19	includes 39:7	institution
human 12:7	28:6 30:6	including	47:17
12:14 13:23	30:6 30:8	19:14 20:11	institutions
14:10	30:9 30:9	60:5 61:22	61:23
16:2 17:4	30:15 30:15	inclusive	integrate
17:23	30:22 38:19	47:23	47:9
18:4 22:3	40:11 40:20	incompetence	intentional
23:13 28:11	42:5	57:10 58:2	58:2
29:16 29:22	42:22	incorrect	interact
29:23 29:24	43:1 43:2	57:20	66:24
41:25	43:11 44:19	indicated	interacted
58:8 59:4	45:25	33:22 48:14	16:21
59:9	49:9	65:18	interacting
	49:20 49:21	indication	36:21
	51:3	57:6	interaction
	52:25 53:14	indirectly	33:24
	54:25	24:4	intercollegia
	55:4 56:3	individual	te 31:19
	56:25	36:15	interdenomina
	60:3	66:2 67:20	tional 8:17
I'd 24:2 43:5	60:11 60:13	individually	interest
idea 31:14	67:22	23:8 66:11	21:17 56:15
31:18 66:15	image 29:23	individuals	57:4 57:11
66:18 66:19	immediate		
identificatio	60:13		
n 13:10	impact		
35:17 65:12	62:11 62:24		
I'll 8:3 14:7	63:3 63:6		
15:11			

international 9:12	66:3 66:11	31:1	
interpret 18:10 18:13 18:15	InterVarsity' s 8:24 8:25 9:10 16:17 17:2 41:1 41:3 59:18	31:22 32:5 33:15 33:24 34:18 36:11 38:25 39:21 39:22 40:14 41:8 41:13 43:19 44:23 45:8 45:14 50:17 51:7 52:1 52:7 52:10 56:8 57:19 58:6 58:8 58:17 59:2 59:24 60:25 61:18 65:6 65:20 66:9	<hr/> J <hr/> January 34:21 Jewish 18:21 30:9 30:10 join 32:8 joint 14:18 Judeo- Christian 47:4 June 16:8 34:4 34:7 34:8 36:17 37:17 39:15 43:18 55:1 58:14 58:21 justice 44:8
interpreted 41:11	interviewed 20:4		
InterVarsity 7:18 7:20 8:4 8:6 8:11 8:17 8:17 9:16 10:1 16:25 17:16 19:2 21:20 22:12 24:5 24:17 26:25 33:15 33:25 34:18 36:9 38:16 39:1 39:22 39:23 41:5 43:19 44:12 47:14 47:19 50:18 51:2 51:4 51:12 51:14 52:11 52:24 53:12 53:20 53:22 56:8 58:6 58:22 59:24 62:12 62:14 64:19 65:5 65:19 65:19 65:22	invitation 25:1		
	invited 21:8 25:2		
	involved 15:5 16:17 23:25 24:4 24:11 33:14 33:24 34:16 35:1 35:8 35:10 47:21 54:20 62:16 64:8 64:12 64:15 64:17		
	involves 41:24	Iowa's 12:7 17:4 25:12 39:11 44:11 58:23	<hr/> K <hr/> Karina 59:7 Katrina 36:6 36:7 36:25 37:6 38:21 59:11 59:14 60:6 62:20 Kevin 6:2 6:7 6:13 51:11 68:15 key 19:4 kinds 10:18 25:1 30:11 47:22 kinetic 24:15 Kummer 6:2 6:7 6:13
	Iowa 8:1 10:3 10:6 10:12 11:2 11:20 12:14 14:2 14:9 14:22 15:2 15:24 16:18 17:19 18:4 24:1 24:5 24:9 24:12 24:17 28:11 30:18 30:24	isn't 43:18 issue 39:15 40:6 58:20 issues 17:10 39:17 items 21:17 I've 9:25 39:14 41:4 55:20 55:21 66:9 IX 31:4 33:5	

6:14	20:19 22:12	39:21 58:20	37:10 40:10
61:15 62:10	22:22	62:20	57:22
65:1 68:15	23:2	leave 47:8	live 8:12
Kutcher 14:13	23:24 26:10	legal 12:3	12:3 29:25
36:4	30:16 45:21	17:5 18:3	lives 53:10
36:15 57:15	58:21	18:7	living 10:17
68:2	leaders 11:11	28:12	local 34:13
<hr/>	11:12 11:15	29:2	locally 33:25
L	16:21 17:13	41:17 42:15	located 7:25
<hr/>	17:16	43:23 45:23	locked 11:5
lack 20:16	19:1	48:11	long 16:24
56:15	19:10 19:19	49:4 50:6	33:19 34:25
57:3 57:11	19:20 19:21	50:16	39:16
language	20:6 20:8	54:5	lose 30:25
56:19 57:3	20:14 21:11	59:23 62:2	lot 21:23
large 64:13	21:19 22:19	legitimacy	25:16
largest 25:6	26:18	49:5	lots 19:13
last 29:21	39:7 40:7	less 23:21	loud 66:3
29:22 29:23	41:2 41:5	29:17	love 9:5
42:2	46:6	let's 22:20	9:5 9:6
late 58:14	46:12 46:14	34:12 39:21	47:15
58:21	47:1 48:4	54:11 66:6	loved 28:2
Latina 27:6	48:8	level 16:20	loves 9:4
law 28:22	50:20 50:22	53:20	lower 32:1
28:24 42:12	51:16 56:12	life 29:2	Lutherans
42:20	62:21	likely	8:19
43:9 50:4	leadership	22:13 22:15	luxury 20:8
lawful 50:12	17:2	limit 39:21	<hr/>
laws 42:8	17:12	45:15	M
49:8	19:4	line 59:3	Madison 7:24
lawsuit 38:12	20:12 20:14	list 22:7	mailing 52:3
64:20 64:21	20:22	25:7	man 26:7
64:23 64:24	21:4 21:4	listed 55:25	26:10 26:17
67:1 67:24	22:3	literally	27:2 27:12
lawyers 60:10	22:17 27:17	22:11	manner 15:5
60:16	39:6 39:6	litigation	
lead 24:23	49:3	15:12 15:20	
leader	50:25		
19:15 19:17	58:7		
	59:13 64:5		
	learned 15:4		
	least 27:23		

49:7	meet 14:17	mind 32:20	motivation
MARCH 6:4	14:23 38:21	mine 56:16	39:25
marginalized	meeting	minister 25:9	mouth 59:2
30:2	11:8 27:2	30:6	move 35:22
mark 12:22	52:18 52:20	ministers	43:20
35:13 65:8	meetings	10:11 10:13	movement
marked 13:8	11:12 53:11	14:17	19:25 47:14
13:9	53:15	24:7 25:3	moving 41:9
13:15 35:15	Melissa 67:10	25:10 53:17	41:14 44:24
35:16 35:19	67:14	59:25	Muslim
65:10 65:11	member 7:18	ministries	18:21
mass 52:3	20:17 24:6	24:18	30:6 30:7
may 15:7 17:7	members	minority 21:2	30:16 50:23
18:8	11:9	mischaracteri	mutual 10:20
25:18 35:22	20:21 21:10	zes 46:4	myself
36:19	21:14 64:11	mission	30:14 55:22
48:7	membership	8:24 8:25	
48:12	17:13	9:11 9:11	N
50:8 54:7	46:3 64:15	9:13 9:15	national 9:11
62:3 67:4	men 26:1	mm 55:14	9:13 9:17
maybe 40:11	28:21 28:23	mm-hmm 6:23	14:7 64:19
43:4 61:15	31:11 31:17	21:18 21:18	nationally
meals 14:20	31:23	23:4 23:8	65:23
mean 8:12	32:2 32:7	25:22 27:25	NCAA 31:4
9:17 9:23	32:15 32:19	30:19 35:25	necessarily
21:12	men's 31:5	36:2	22:18 37:10
23:6	32:21 33:7	49:19 49:23	negative
24:13 25:14	mentioned	49:25	62:24
27:16 28:18	19:1	53:5	63:2 63:6
29:3	33:17 57:16	55:12 55:12	63:20
29:20 42:10	64:18	56:22	Nelson
46:18 46:19	message 47:2	61:2 65:15	67:19 67:20
51:11 54:24	met 14:18	model 43:21	67:23
58:2	57:16	month 34:1	network 10:12
64:10 65:22	Methodists	34:4 59:8	nice 20:8
means 30:1	8:18	Mormon 18:21	nominate
58:13	mid 64:16	morning 17:15	19:23
meant 27:5	middle 13:23	21:21 58:15	
63:12			

nominated 21:3	15:16 23:23 31:6 37:7 56:9	26:10 26:20 27:19 27:24 28:1 28:9 29:1 31:3 31:7	52:13 52:18 53:6 53:19 54:2 54:11 54:18
nominating 20:10	okay 6:14 6:17 6:24	31:11 31:21 32:4 32:7 33:4	55:16 56:2 56:23 57:15
non-African 48:8	7:14 7:15 7:21 7:25	33:10 33:14 33:19 33:22 34:2 34:6	57:24 58:4 58:5 58:11 58:15
nonbeliever 20:17 22:11 22:23 23:23	8:4 8:7 8:9 8:14 8:16 8:23 9:10	34:16 34:20 34:25 35:6	59:1 59:17 60:4 61:8
non-Muslim 50:25	9:14 10:2 10:5 10:22	35:13 36:3 36:5 36:11	61:9 61:21 62:5 65:8
normally 20:9 63:13	11:4 11:7 11:14 11:18 11:23	37:2 37:8 37:23 38:2	65:18 65:25 66:10 66:16 67:8
nutshell 12:15	12:1 12:5 12:13 12:19 13:5	38:11 38:14 38:20 38:24 39:3	67:11 67:14 67:18 68:1 68:3
<hr/> 0 <hr/>	13:17 13:22 14:1 14:13 14:25	39:10 39:16 39:20 40:5	68:8 68:10 68:12 Olympic 31:21
Obama 24:21	16:4 16:11 16:17 16:24	40:13 40:22 40:25 41:12 41:23	ones 10:9 11:12 19:20 19:21
Objection 17:5 18:6 26:12 28:12 41:16 42:15 43:22 45:22 46:4 48:10 50:6 54:5 67:2	17:2 17:12 17:22 18:15 18:23 19:7 19:11	42:5 43:8 43:12 43:18 44:3 44:5 44:10 44:21 45:2 45:7	ongoing 59:23 open 32:4 opened 24:25 operate 20:24 operating 10:20 opinion 48:7 opportunities 32:25 33:2 64:6
obviously 44:22	20:5 20:19 21:10 21:16 22:10	46:17 46:21 48:2 48:23	
occurring 60:8	22:20 22:21 23:9 23:25	49:7 49:10 49:14 50:11 50:15	
offer 47:18	24:8 24:11 25:11 25:17 26:7	51:6 51:25 52:9	
offers 53:25			
office 26:1			
official 22:19 22:20 22:22 38:6			
oh 13:12			opportunity

62:19	participated	period 55:10	12:7
opposed 35:8	25:8	permission	12:14
order 32:24	particular	11:2	14:1
ordinarily	8:16 9:19	11:10 11:13	14:10
34:12 34:16	17:10	11:14	16:2
organization	25:8 47:5	person	23:13
19:25	47:15 55:25	12:16	44:4 46:5
23:2 23:3	62:21 63:19	21:7	50:17 53:16
51:8	63:22 64:1	23:10 23:20	58:9 59:4
organizations	passed	34:10 36:18	pool 64:6
16:1	15:10 42:12	36:24	position
25:12 40:15	43:9	47:7 47:9	39:11
45:10	passing 14:19	64:1	41:1 41:3
OrgSync 56:24	past 9:19	personally	50:24 58:23
58:1 63:1	43:20 47:20	8:11	positions
orientation	55:22 64:14	58:21 67:12	46:25
12:17	pay 51:22	persons	potential
origin 14:7	pending 15:12	14:6 17:25	11:9
others	people 7:8	phone 60:20	Practically
10:15 46:24	9:6 9:18	physically	31:13
51:22 56:12	12:2 17:9	7:25 8:9	pray 19:22
ought 46:13	18:19 19:13	35:4	prayer
46:17 46:20	19:22 19:23	places 21:24	24:23 24:25
overseas	20:3	planning	25:4
16:15	20:11	62:23	59:20 59:20
	21:3 21:6	play 31:12	60:2 60:18
	21:24 22:16	playing 32:21	precious
	23:8	32:24	29:24
	23:13 23:14	please 6:12	predominantly
	25:20 26:24	13:18 35:14	27:8
	28:23 39:17	44:19 65:14	preference
	41:6	point 9:21	49:8
	46:23 48:18	15:24	49:11 49:22
	57:23	39:4 39:5	premise 48:9
	63:3 63:6	56:6 57:4	prepare
	64:12 64:15	policies 10:6	38:3
paragraph	people's	policy	60:13 63:11
37:21	10:17	10:19 10:20	presented
parameters	perhaps 11:16		
10:21 10:22	42:9 55:18		

21:5	32:25	31:19 38:22	registered
president	provides 14:4	47:11 47:15	15:25 25:12
36:9 66:8	providing	56:1	51:8
previous 40:4	52:10	61:15	regularly
prior 57:17	public	63:7	64:12 64:15
prison 66:21	51:20	63:13 66:1	64:17
probably 9:22	54:1 61:23	reason	regulations
27:1	publicize	15:14	10:7
32:10 63:5	63:13 64:7	37:2 37:5	11:21 54:4
problem 59:13	purpose	47:13	relates 10:13
procedures	26:2	reasons 29:20	religion 14:7
10:6	26:23	44:14 44:17	14:11
process	28:7 28:9	48:17	18:1
6:18 19:4	39:9	recess 61:11	18:16 18:17
20:3 21:1	48:19 48:20	recognition	22:10 62:1
21:1 23:7	purposes 9:8	63:12	religious
41:25 59:13	<hr/>	reconciliatio	12:16
62:12	Q	n 47:22	18:2
64:8 64:21	question 6:21	record 6:12	40:19
programs 14:5	7:6 7:11	46:7	42:4 46:3
33:12	18:3	47:19 61:10	46:12
prohibited	36:23 44:18	61:12 68:13	remember
11:24 42:13	45:17	recruitment	37:16 56:16
prohibiting	questions	34:21	57:2
43:9	61:6	35:2 51:18	removed 57:3
prohibits	61:16	redacted 37:9	rent 51:23
61:21 61:25	62:6	redactions	rent-free
property	64:25	37:10	51:17
11:19	68:3 68:11	redirect 62:7	rephrase
proposed	quite 63:20	referring	44:18
44:11	64:1	37:19 37:20	reporter 6:19
proselytize	<hr/>	reflect 47:1	7:7 13:8
10:15	R	reflecting	35:15
protect 42:1	race 14:6	9:3	43:4 50:1
protects	18:1 22:4	reflection	61:10 61:12
28:22	26:21 42:13	25:4	65:10 68:13
provide 24:22	react 39:18	regardless	37:8 60:25
	reaction 49:5	12:16	
	really 31:9		

request 57:3	12:14 13:23	39:5 58:3	46:15 59:25
requested 56:18 57:10	14:10	seen 57:17	sharing 14:19
required 45:5 65:19	16:2 17:4 17:23	select 20:6 20:21	she/he 63:24
requirement 49:2	18:4 22:3 23:13 28:11	46:6 46:11 46:14	she's 36:13 67:11 67:16
reregistered 64:22	29:16 41:25 58:8 59:4 59:9 61:19	48:3	Shivers 14:17 67:10 67:14
resources 53:23	Rockland 24:23	selected 19:19 22:15	short 9:20 21:10 61:8
respect 9:10 10:15 10:20 12:18 23:19 29:17 29:18 29:20 50:15	Rockland's 25:1	selection 17:3 17:13 19:4 39:6 58:7 59:13	shorten 8:3 showed 60:17
respond 56:1	role 25:9 34:19	senators 15:8	signed 15:2 significant 63:15 64:9
response 6:22 34:9 45:11	room 52:21 52:21	senior 7:17 9:17 20:10	Sikh 18:21 simple 12:1 simply 59:21
responses 16:18	rule 12:2 41:21	sense 19:10 19:11 19:16 23:3 26:12 32:25	sing 66:21 single 10:19 12:16 55:18 55:23
responsible 9:14 19:20 20:15	rules 11:20 12:5	47:2 48:5 49:16 50:14	sir 48:5 sit 60:20
rest 22:2	ruling 40:14	separate 31:4 47:7	situation 26:6 33:17 63:18 64:3
restate 7:12	<hr/> S <hr/>	separations 32:22	slow 29:6 43:4
result 63:17	Sates 43:16	series 53:1	smaller 64:5 64:5
retaliation 63:25	saw 56:20 59:8	seriously 21:9	society 30:17
review 38:3 39:23 40:15	scale 25:6	several 25:5 66:22	somebody's 8:21
rich 26:4	Schrock 36:6 36:7	sex 42:14	somehow 28:20
richest 28:4	second 7:5 13:18 35:24	sexual 12:17	
ridiculous 41:20	seeing 32:20	share 17:20 18:19 39:7 46:24	
rights 12:7	seek 21:2	shared 41:6	
	seem 34:8		
	seemed 45:12		
	seems 29:16		

29:16	15:20	state-	64:4
someone 20:11	speculation	provided	stuffs 32:20
23:16 24:22	45:23 48:11	53:21 54:3	style 6:21
24:23 29:17	67:3	States 42:12	subject
30:13	Speech 15:2	status 7:16	10:5
49:2 66:9	spending	49:12	11:20 54:3
somewhere	66:13 66:25	Statute 61:19	submit 38:16
37:17	67:15 67:23	sticking 39:4	successors
sororities	sponsored	39:5	20:6
48:16	26:25	stop 14:7	sue 65:19
sorry 13:20	sports	stops 27:24	sued 65:5
18:12	30:18	stories 28:5	66:3
29:6	31:5	strict	67:11 67:20
30:23 30:25	31:21	21:12 21:15	summer
38:19	32:5 32:8	strive 21:20	62:21 63:10
43:1 43:2	32:9 33:8	strong	support
43:3	48:15	15:13 40:12	15:8 26:3
44:20	staff 7:17	58:24	26:7
50:2	9:2 9:17	student 11:11	supportive
52:25	9:17	11:11 11:15	25:18
53:6	14:17 14:18	15:25 15:25	26:9
53:14 54:25	62:14 64:19	16:21 19:20	27:12 48:24
61:4	stage 20:21	19:21	supposedly
sort 28:22	standing	25:9	42:1
49:4	47:23	25:12 30:16	sure 6:17
sorts 33:9	stapled 13:12	36:12 36:13	10:24 10:25
52:17	start 13:4	40:15 40:22	16:1
sought 44:15	38:15	41:6 45:9	16:18 16:22
speak 30:7	started 36:19	45:19 50:22	25:14 32:13
39:25 58:15	state 6:11	50:24	37:4
59:14 65:21	15:1 15:8	51:8	40:15 42:22
speaking	52:10 53:23	51:16 56:12	45:25
7:5 24:21	54:4 61:22	student-run	49:9 53:4
31:13	statement	19:25 19:25	59:9 60:11
specific	9:11 9:13	students	surplus
26:13	9:15 59:9	9:1 21:23	20:8 20:14
specifically	statements	47:15 62:17	surprise
57:13 57:14	9:24 38:4	62:18 63:19	66:25
specifics			

surprised 43:11 57:6 57:8 63:17	18:2 21:21	32:1 32:1 32:15 37:10 38:9 47:11 60:21	try 29:6 47:2
swimmers 31:23 31:24	term 20:16 38:6 40:12 46:18	thin 62:19	trying 20:25 42:1 45:9 45:12 64:22
sworn 6:7	terms 29:11 38:17 40:1 45:11 48:15 51:3 63:21	Thomas 68:6 68:9	turn 13:17 35:24
<hr/> T <hr/>		THURSDAY 6:4	twice 35:11
tad 43:5	terrified 63:23 63:25	Title 31:4 33:5 42:7 43:8	type 39:12
taking 52:17 53:20 54:2 67:16 68:6	testified 6:8	today 7:13 59:22 60:1 60:14	<hr/> U <hr/>
talk 6:18 9:4 23:7 53:18 57:23 59:19 59:21 60:6	testify 48:2	today's 38:3 59:19	Uh 36:25
talked 6:17 20:4 52:19	testimony 46:5	Tom 24:23 24:25	uncertainty 63:9 63:11
talking 7:12 18:18 38:11 38:15 51:11 51:12 52:16 52:24 60:19	Thank 13:13 61:14 62:5 68:10	top 37:19 38:15 55:6 55:9	understand 7:11 11:1 11:4 11:18 11:23 14:9 15:23 20:5 21:22 28:16 31:9 32:22 33:7 34:20 39:3 39:17 41:8 41:10 41:19 42:11 42:23 43:8 43:14 45:8 49:14 49:24 50:4 50:11 51:6 51:22 52:6 62:4 63:7
tastes 29:12	themselves 47:12	torture 30:23	
taxpayers 53:25	therefore 28:23 53:25	towards 40:19 44:8	
team 20:12 20:14 21:4 31:12 31:19 32:21 59:20	there's 9:18 12:5 19:3 21:16 21:17 22:14 25:15 25:16 28:22 30:11 31:4 34:21 42:23 48:15 49:16 50:11 61:18 63:19	town 35:1 35:7	
teams 48:15	they'd 21:25	track 32:12 32:14	
tend 20:24	they're 18:20 21:8 21:23 29:14 31:17	trail 37:20	
tenets 17:14		train 44:19	
		transitions 36:20	
		treat 12:15 23:21 29:16	
		treatment 14:6 17:25	
		true 47:5	

66:10 67:11	24:12 24:17	USA 7:18 7:20	visited 63:3
understanding	24:22 24:24	usually	vitality 29:22
12:13 21:25	25:2 25:7	21:5 64:16	vote 21:12
46:15 46:15	26:5	<hr/>	21:15
47:4 56:7	28:11 29:24	V	voting 21:1
57:20 58:5	36:11 36:21	<hr/>	21:1 21:11
understood	39:11 39:20	vacation	<hr/>
39:10 58:22	39:22 40:14	34:14 34:15	W
58:25	41:8	55:11 56:3	wasn't 27:5
59:2 59:5	41:11 41:13	valuable	38:22 40:18
59:6 59:7	43:19 44:11	29:22 29:25	60:1
unfairly	44:15 44:23	value 12:20	ways 21:6
50:18	45:8	valued 27:1	29:19
unh-unhs 53:5	45:14 46:19	values 47:3	wearing 64:7
uninvited	47:12 47:16	47:10	webpage 56:14
10:17 53:18	50:17	variety 48:17	website
Union 35:4	51:7	various 10:14	52:1 52:7
51:17	51:25	10:18 48:14	56:21 57:12
United	52:6	verbal 6:21	57:19 57:25
42:12 43:15	53:17 53:24	versus 31:23	58:20
units 10:17	54:1 56:8	veteran 49:20	we'd 20:9
universities	56:13 56:21	veterans 49:8	23:7
9:2	57:9	49:11 49:22	weeks 33:21
university	57:19	via 16:21	35:11
10:3 10:6	58:6 58:8	VII 42:7 43:8	we'll 13:16
10:11 10:13	58:17 58:23	violate 28:9	38:15 58:4
10:22	59:2	violated 28:7	we're 7:12
11:2	59:24 60:25	violates 44:4	10:10 18:18
11:19 11:20	63:21 63:25	violating	24:19 30:24
12:2 12:6	65:6	18:3 18:4	38:15
12:14	65:20 66:8	violation	41:1 41:9
14:2 14:9	university's	29:15	43:20 44:23
14:22	10:21	violations	49:20 52:23
15:1	unlawful	41:24	52:24 61:10
15:24 16:18	50:12	virtue 31:16	61:12 68:13
17:3	unlike 7:1	vision 17:20	we've 14:18
17:18 18:19	8:18		14:20 23:22
23:12 23:12	unqualified		25:8
23:14 23:16	23:17		39:14 47:20
24:1 24:5	unusual 55:19		
	upper 64:16		

53:5	50:2 50:9	written 15:7	
63:14	53:3 53:6		
64:4 64:4	53:9 54:8	<hr/>	
64:5 64:16	54:25	<hr/> Y <hr/>	
whatever	55:3 62:4	year-round	
29:11 53:20	67:5	62:18	
WHEREUPON	witnessing	year's 36:8	
13:9	9:20	you'll 59:6	
35:16 61:11	woman 27:20	younger 21:23	
65:11 68:14	27:23 28:6	yours 13:12	
whether 18:20	women 25:19	you've 38:7	
white 26:1	25:19 25:21	39:16 58:6	
26:7	25:25		
26:10 26:17	26:2 26:5		
27:7	26:8		
27:12 28:21	26:11 26:13		
28:23	26:16 26:24		
whole 21:3	27:2 27:7		
21:5 22:7	27:8		
47:6 53:1	27:13 27:14		
64:3 65:22	28:3		
wife 27:13	28:17 28:20		
60:5	31:24 32:16		
60:19 66:22	32:19 45:19		
William 67:19	women's		
willing	31:5		
48:2 48:6	31:12		
window 62:19	32:8 32:9		
Wisconsin	33:7		
7:24	wonderful		
WITNESS 13:13	26:4 30:11		
17:8 18:9	wording 56:16		
26:16 28:15	work 8:3		
30:22 37:24	8:5 8:15		
38:9	8:20		
41:19 42:18	worked 39:16		
43:6	working		
43:25 45:25	52:2 62:16		
48:13	world 9:9		

2 Deposition of: Kevin Kummer Date: 03/28/19

3 Regarding: Intervarsity Christian vs. U of Iowa

4 Reporter: Batterson/Morrison

5 _____

6 Please make all corrections, changes or clarifications
7 to your testimony on this sheet, showing page and line
8 number. If there are no changes, write "none" across
9 the page. Sign this sheet on the line provided.

10	Page	Line	Reason for Change
11	24	14-15	I'm not sure which words I used, but I don't believe
12			I used the words "the kinetic of it."
13	24	23	"Rocklin" is the correct spelling.
14	25	1	" "
15	25	25	I believe I said "one" and not "some."
16	30	11	"Hillel", not "Halal"
17	30	25	"in a row", not "of them"
18	32	20	I'm sure I did not say "stuffs", but I don't recall what I did
19	33	9	"parts", not "sorts"
20	51	2	"discrimination", not "dissemination"
21	62	13	"bit", not "big"
22	72	3	"Intervarsity" (no space between "r" + "v", not "Intervarsity")

24 Signature Kevin Kummer

25 Kevin Kummer

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

EXHIBIT B

EXHIBIT 1	
DEPONENT NAME: Kummer	DATE: 3/28/19

From: Kutcher, Andrew M

Sent: Friday, June 1, 2018 3:09 PM

To: [REDACTED]

Subject: Registered Student Organization Compliance - Action Required

NOTE: This communication is being sent to all Primary and Secondary Representatives, and Advisors, as they are listed on a Registered Student Organization's (RSO) OrgSync portal. YOUR ATTENTION AND IMMEDIATE ACTION IS REQUIRED.

Dear [REDACTED],

The Center for Student Involvement and Leadership (CSIL) has identified that the constitution of InterVarsity Graduate Christian Fellowship either does not include the current language related to the University of Iowa Human Rights Clause or it is missing in its entirety. All RSOs are required to have this Clause included verbatim in their constitution or bylaws.

Human Rights Clause:

In no aspect of its programs shall there be any difference in the treatment of persons on the basis of race, creed, color, religion, national origin, age, sex, pregnancy, disability, genetic information, status as a U.S. veteran, service in the U.S. military, sexual orientation, gender identity, associational preferences, or any other classification which would deprive the person of consideration as an individual. The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons. Eighty percent (80%) of this organization's membership must be composed of UI students.

Your RSO must update your current governing documents to include the required Human Rights Clause to continue as a RSO now and in the future. Additionally, RSO governing documents may not include language that is considered contradictory to the Human Rights Clause. Any language considered contradictory, must be removed. Once you have made this update, you must submit all governing documents to CSIL using the form linked here: <https://orgsync.com/14241/forms/311661>

If you have language in your constitution or bylaws that is outdated, often found in the membership section, you simply need to remove the old language and insert the required new language listed above. If you realize you do not have any part of the Human Right Clause, it needs to be inserted **VERBATIM**, within the membership section.

The deadline to submit changes is **June 15, 2018, or your RSO will be de-registered**. If de-registered, registration can be reinstated by submitting governing documents with required language to CSIL, using the link above. RSOs will receive feedback on their updates, and the submitting person will be updated via email if additional changes are required.

We recognize many RSOs require a vote of the membership to ratify governing documents. We ask you to insert the Human Rights Clause into your governing documents with the understanding you will hold a vote of confirmation once the fall semester commences. If allowed by your constitution or bylaws, you may hold an electronic vote of confirmation immediately.

Please see the [FAQs](#) for more information.

Thank you for your attention and timely action to address this issue. Please to contact to CSIL staff at csil-student-org@uiowa.edu should you have any questions.

Andy Kutcher

Andy Kutcher, M.Ed.

he, him, his

Coordinator for Student Organization Development

Center for Student Involvement & Leadership

andrew-kutcher@uiowa.edu

<http://csil.uiowa.edu>

Adaptability | Harmony | Positivity | Consistency | Arranger

IMU Center for Student
Involvement
& Leadership

145 Iowa Memorial Union

Iowa City, Iowa 52242-1317

319-335-3059 Fax 319-353-2245

getinvolved@uiowa.edu

Schedule an appointment with me

Notice: This UI Health Care e-mail (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521 and is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you are not the intended recipient, any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy all copies of the original message and attachments thereto. Email sent to or from UI Health Care may be retained as required by law or regulation. Thank you.

EXHIBIT D

EXHIBIT	
2	
DEPONENT NAME: Kummer	DATE: 3/28/19

From: Kutcher, Andrew M

Sent: Wednesday, June 13, 2018 4:02 AM

To: Schrock, Katrina N <[REDACTED]@uiowa.edu>

Cc: Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>; [REDACTED]
<[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]
[REDACTED]@uiowa.edu>; kkummer50@[REDACTED]; King, Laurynn L <laurynn-king@uiowa.edu>

Subject: Re: InterVarsity Graduate Christian Fellowship Governing Documents

Hi Katrina,

We encouraged groups to get there governing documents submitted by the 13th in order for us to have time to review them and provide feedback prior to the 15th deadline. The 15th is our deadline for groups not wanting to be deregistered.

The form to submit will remain open for groups that go deregistered to submit after June 15. If a group goes deregistered they will become reregistered when they submit governing documents compliant with the Human Rights Clause.

Hope this makes sense. Please let me know what questions you have.

Best,

Andy

On Jun 12, 2018, at 11:45 PM, Schrock, Katrina N <[REDACTED]@uiowa.edu> wrote:

Andy,

In an email from Laurynn this morning we were told "**The updated document(s) are due tomorrow, June 13th or your student organization will be placed on unregistered status.**" However, an earlier email from you, dated June 1st, said: "The deadline to submit changes is **June 15, 2018, or your RSO will be de-registered.** If de-registered, registration can be reinstated by using the link above to submit governing documents with the Human Rights Clause and no language that is considered contradictory to the Human Rights Clause." Can you please confirm that we have until the close of business on June 15?

Thank you,

Katrina

From: Student Organization Help & Information

Sent: Tuesday, June 12, 2018 4:05 PM

To: Schrock, Katrina N <[REDACTED]@uiowa.edu>; Student Organization Help & Information <CSIL-

Student-Org@uiowa.edu>; Kutcher, Andrew M <andrew-kutcher@uiowa.edu>

Cc: [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <s[REDACTED]@uiowa.edu>; [REDACTED]
[REDACTED] <[REDACTED]@uiowa.edu>; kkummer50@[REDACTED]

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Hi Katrina,

I just received word that we would not approve the change in language you proposed. Student orgs are free to express whatever language they desire in their mission/purpose, but the University and the Center for Student Involvement and Leadership must enforce our Human Rights Clause when it comes to leadership and membership.

I also wanted to let you know that I am out of the office starting tomorrow and will be back in on Tuesday. I will be doing my best to check email while away and would be happy to answer any further questions or address any concerns. I've copied my University Andemail address to this email in order to be able to follow up.

Best,

Andy

From: Schrock, Katrina N

Sent: Tuesday, June 12, 2018 11:25 AM

To: Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>

Cc: [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED]
[REDACTED] <[REDACTED]@uiowa.edu>; kkummer50@[REDACTED]

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Andy,

Thank you for your clarification! Obviously, I will need to discuss any changes with the rest of the leadership team, but I do have a question. Would changing the language of the constitution from "must subscribe..." to something like "are requested to subscribe..." or "are strongly encouraged to subscribe..." make it so that the constitution is no longer contradictory? Again, I will need to discuss changes, but your input on this matter is greatly appreciated.

Thank you,

Katrina

From: Student Organization Help & Information

Sent: Tuesday, June 12, 2018 11:19 AM

To: Schrock, Katrina N <[REDACTED]@uiowa.edu>; Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>

Cc: [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; kummer50@[REDACTED]

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Katrina,

I recognize the wish to have leadership requirements based on Christian beliefs, however Registered Student Organizations are considered University of Iowa programs and thus must follow the Human Rights Clause in its entirety. Having a restriction on leadership related to religious beliefs is contradictory to that clause.

I'm happy to chat further about this and provide any information I can.

Best,

Andy

Andy Kutcher, M.Ed.

he, him, his

Coordinator for Student Organization Development
Center for Student Involvement & Leadership
andrew-kutcher@uiowa.edu
<http://csil.uiowa.edu>

<image001.jpg>145 Iowa Memorial
Union

Iowa City, Iowa 52242-1317
319-335-3059 Fax 319-353-2245
getinvolved@uiowa.edu

Adaptability | Harmony | Positivity | Consistency | Arranger

[Schedule an appointment with me](#)

From: Schrock, Katrina N

Sent: Tuesday, June 12, 2018 11:02 AM

To: Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>

Cc: [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; kummer50@[REDACTED]

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Andy,

I would guess that the issues you see involve potential contradictions to the part of the Human Rights Clause that states: "In no aspect of its programs shall there be any difference in the treatment of

persons...". From my reading, the language of the constitution does not contradict the later part of the Clause, which states: "...equal access to membership, programming, facilities, and benefits shall be open to all persons". Membership, events, and other facets of the group are not restricted – the only restriction is specifically for leadership positions.

While I understand that this leadership restriction can be construed as a difference in treatment, it is also important to have Christian leadership in a Christian organization. We do not in any way discourage those who may not subscribe to the basis of faith in Article II from participating in IVGCF as members, but we do recognize that having Christian leadership is important to the fulfillment of our purpose.

The above are my thoughts, but I am open to having further dialogue on the matter.

Katrina

From: Student Organization Help & Information

Sent: Tuesday, June 12, 2018 10:43 AM

To: Schrock, Katrina N <[REDACTED]@uiowa.edu>; Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>

Cc: [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; kummer50@[REDACTED]

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Katrina,

On my initial review I see several issues. As part of compliance with the Human Rights Clause, organizations cannot have any language deemed contradictory to that Clause. I'm seeing potential contradictory language in Articles II, III, IV and VII. The language is directly related to the ability to become a member or to hold leadership positions.

Please let me know your thoughts, questions or concerns. I want to make sure this is clear.

Best,

Andy

From: Schrock, Katrina N

Sent: Tuesday, June 12, 2018 10:27 AM

To: Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>

Cc: [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED]

██████████ <██████████@uiowa.edu>; kkummer50@██████████

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Andy,

I've now used the form you linked to submit the updated constitution. Please let me know if there is anything else you need from us, and thank you for your quick reply and for checking into the submission.

Katrina

From: Student Organization Help & Information

Sent: Tuesday, June 12, 2018 10:06 AM

To: Schrock, Katrina N <██████████@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>

Cc: ██████████ <██████████@uiowa.edu>; ██████████ <██████████@uiowa.edu>; ██████████ <██████████@uiowa.edu>; kkummer50@██████████; Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Hi Katrina,

Did you use the OrgSync form (<https://orgsync.com/14241/forms/311661>) to submit? I'm not seeing your submission in the form or on the InterVarsity Graduate Christian Fellowship's OrgSync portal.

Best,

Andy

From: Schrock, Katrina N

Sent: Tuesday, June 12, 2018 9:25 AM

To: King, Laurynn L <laurynn-king@uiowa.edu>

Cc: ██████████ <██████████@uiowa.edu>; ██████████ <██████████@uiowa.edu>; ██████████ <██████████@uiowa.edu>; kkummer50@██████████; Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Laurynn,

I was under the impression that the InterVarsity Graduate Christian Fellowship's constitution had been updated with the Human Rights clause, and submitted to OrgSync on either the 1st or 2nd of June. If this is not the case, I would appreciate if you would let me know as soon as possible, so that we can make the required changes.

Thank you,

Katrina

From: King, Laurynn L

Sent: Tuesday, June 12, 2018 9:15 AM

To: [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>

Cc: Schrock, Katrina N <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>;

kkummer50@[REDACTED]; Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Thank you for your reply, [REDACTED]. It is important to keep your OrgSync profile updated with your new leadership team's contact information up-to-date, so we are able to reach out to the most current representatives.

Enjoy your day,

Laurynn

Laurynn King

she, her, hers

Administrative Services Coordinator
Center for Student Involvement & Leadership
laurynn-king@uiowa.edu

<http://csil.uiowa.edu>

Relator // Competition // Futuruistic // Woo // Belief

<image002.jpg>

157 Iowa Memorial Union

Iowa City, Iowa 52242-1317

319-335-3059 Fax 319-353-2245

getinvolved@uiowa.edu

From: [REDACTED]

Sent: Tuesday, June 12, 2018 9:11 AM

To: King, Laurynn L <laurynn-king@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>

Cc: Schrock, Katrina N <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>;

kkummer50@[REDACTED]

Subject: Re: InterVarsity Graduate Christian Fellowship Governing Documents

Hi Laurynn,

We forwarded the original email to the current leadership team. Both [REDACTED] and I are no longer serving on the team. I believe they were working on updating this information, but I have CC'd them on this email.

Thanks,

[REDACTED]

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "King, Laurynn L" <laurynn-king@uiowa.edu>

Date: 6/12/18 8:44 AM (GMT-06:00)

To: "[REDACTED]" <[REDACTED]@uiowa.edu>, "[REDACTED]" <[REDACTED]@uiowa.edu>

Subject: InterVarsity Graduate Christian Fellowship Governing Documents

[REDACTED] -

I am following up to several communications our office has sent regarding InterVarsity Graduate Christian Fellowship Governing Documents on campus. Our office has you listed as contacts for this student organization.

We've sent a few e-mails, and also left voicemails, over the past few months regarding the need to update the organization's governing documents to include the University of Iowa's Human Rights clause. **The updated document(s) are due tomorrow, June 13th or your student organization will be placed on unregistered status.**

Please let me know a status update on these documents, or if you have any questions regarding the updates, and I can assist you.

Thank you in advance,

Laurynn

Laurynn King

she, her, hers

Administrative Services Coordinator
Center for Student Involvement & Leadership

laurynn-king@uiowa.edu

<http://csil.uiowa.edu>

Relator // Competition // Futuruistic // Woo // Belief

<image002.jpg>

157 Iowa Memorial Union

Iowa City, Iowa 52242-1317

319-335-3059 Fax 319-353-2245

getinvolved@uiowa.edu

Notice: This UI Health Care e-mail (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521 and is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you are not the intended recipient, any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy all copies of the original message and attachments thereto. Email sent to or from UI Health Care may be retained as required by law or regulation. Thank you.

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

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

Plaintiffs,

v.

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

Defendants.

Civ. Action No.: _____

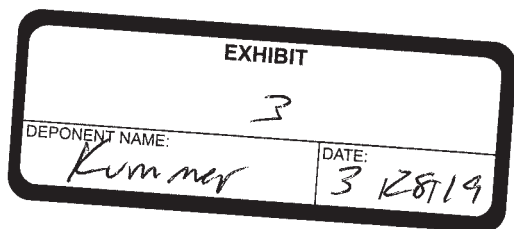
COMPLAINT

Matt M. Dummermuth
Hagenow Gustoff & Dummermuth, LLP
600 Oakland Rd. NE
Cedar Rapids, IA 52402
(319) 849-8390 phone
(888) 689-1995 fax
mdummermuth@whgllp.com

Eric S. Baxter*
Lead Counsel
Daniel H. Blomberg*
The Becket Fund for Religious Liberty
1200 New Hampshire Ave. NW, Suite 700
Washington, DC, 20036
(202) 955-0095 phone
(202) 955-0090 fax
ebaxter@becketlaw.org
dblomberg@becketlaw.org

Counsel for Plaintiffs

**Admission pro hac vice pending*



1. This dispute arises from unconstitutional and unlawful discrimination by the University of Iowa and the Defendant Officers (collectively, “the University”) against Plaintiff InterVarsity Graduate Christian Fellowship, a graduate student group that the University recently deregistered *solely* because it requires its student leaders to believe and follow its Christian faith.

2. InterVarsity Graduate Christian Fellowship is a Christian student ministry that has served graduate students at the University for 25 years. InterVarsity has hosted student activities, joined the University’s annual MLK Day of Service, sponsored annual Christmas food drives for the poor, and participated in the Johnson County C.R.O.P. Hunger Walk (as the top fund-raising organization in six of the last seven years). Anyone is welcome to participate in its activities and all students may join as members.

3. Throughout its 25 years on campus, InterVarsity has asked its student leaders—who lead the group in prayer, worship, and religious teaching—to hold to the same faith that animates and unites the group. Yet now, for the first time, the University claims that InterVarsity may not require its leaders to affirm that they share its religious beliefs.

4. On June 1, 2018—weeks after the end of spring semester classes—the University abruptly emailed InterVarsity’s student leaders and instructed them that they had until June 15 to change their leadership selection practices or be deregistered.

5. When InterVarsity’s student leaders responded emphasizing the importance of having Christian leadership, the University stated that it “recognize[d] the wish to have leadership requirements based on Christian beliefs,” but that “[h]aving a restriction on leadership related to religious beliefs” is impermissible. The University further stated that InterVarsity student leaders could not even be “strongly encouraged” to agree with InterVarsity’s faith.

6. The University has now stripped InterVarsity of its registered student group status, along with all of the many valuable rights and benefits available only to groups with that status, and relegated InterVarsity to second-class status. No complaints have ever been filed against InterVarsity for any reason. The only basis for deregistration was InterVarsity's religious leadership requirement.

7. The University has also reportedly done the same to numerous other religious student groups on campus, including the Chinese Student Christian Fellowship, the Geneva Campus Ministry, the Imam Mahdi Organization, the Latter-day Saint Student Association, and the Sikh Awareness Club. *See* Vanessa Miller, *The Gazette, University of Iowa deregisters another 38 groups*, (Jul. 20, 2018), <http://bit.do/etNrR>.

8. The University's purge of dissenters causes uniquely existential harm to religious groups. A group's leaders are the embodiment of its identity and mission. While the University allows political and other ideological groups to select leaders based on shared identity and mission, the University's position makes it impossible for religious groups to do so. A religious group denied religious leadership will ultimately cease to be religious.

9. The University's position is also discriminatory. For instance, the University (rightly) allows fraternities to have only male leaders and members, and female athletic clubs to have only female leaders and members. Republicans and Democrats can each choose to be led by those who share their political beliefs. Yet while it makes broad exceptions for political groups, fraternities, sororities, and sports clubs to select both their leadership and membership, it denies a narrower accommodation for religious groups to select their leaders.

10. Finally, the University's attempt to control religious groups in this way impermissibly entangles the government in religious affairs. The State of Iowa has no business telling religious groups who their religious leaders should be.

11. In sum, the University's discrimination against dissenting religious groups is unfair and unconstitutional. It should be reversed, and InterVarsity allowed to resume providing the same service to the community that it has for the past 25 years.

JURISDICTION AND VENUE

12. This action arises under the Constitution and laws of the United States. The Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1343.

13. The Court has authority to issue the declaratory and injunctive relief sought under 28 U.S.C. §§ 2201 and 2202.

14. Venue lies in this district under 28 U.S.C. § 1391(b)(1) and (2).

IDENTIFICATION OF PARTIES

15. Plaintiff InterVarsity Christian Fellowship/USA is an Illinois not-for-profit corporation with its headquarters in Madison, Wisconsin. InterVarsity is a Christian ministry active in campus ministry on hundreds of campuses across the United States, including many in Iowa.

16. Plaintiff InterVarsity Graduate Christian Fellowship is an unincorporated association which conducts religious ministry at the University of Iowa in Iowa City, Iowa. The association is a constituent chapter of InterVarsity.

17. Defendant University of Iowa is a public university that is an arm of the State of Iowa.

18. Defendant Bruce Harreld is the President of the University of Iowa and is sued in his official and individual capacities.

19. Defendant Melissa S. Shivers is the Vice President for Student Life and is sued in her official and individual capacities.

20. Defendant William R. Nelson is the Associate Dean of Student Organizations and is sued in his official and individual capacities.

21. Defendant Andrew Kutcher is a University official who is in charge of Student Organization Development at the Center for Student Involvement and Leadership and is sued in his official and individual capacities.

22. Defendant Thomas R. Baker is the University's Student Misconduct and Title IX investigator and is sued in his official and individual capacities.

23. All Defendants are persons acting under color of state law within the meaning of 42 U.S.C. § 1983.

FACTUAL ALLEGATIONS

InterVarsity Christian Fellowship/USA

24. InterVarsity Christian Fellowship/USA is active in campus ministry on hundreds of campuses across the United States and Iowa. It has over 1,000 individual chapters. It is a charter member of the International Fellowship of Evangelical Students, an association of over 160 evangelical Christian student movements worldwide.

25. InterVarsity was founded by students at the University of Cambridge in 1877. In 1938, students at the University of Michigan formed the first InterVarsity chapter in the United States. *See InterVarsity, InterVarsity and IFES History*, <https://intervarsity.org/about-us/intervarsity-and-ifes-history>.

26. InterVarsity currently has chapters at many other public and private universities and colleges in Iowa, including at Buena Vista University, Central College, Coe College, Des Moines Community College, Drake University, Grinnell College, Iowa State University, Iowa Wesleyan

College, Northwestern College of Iowa, and the University of Dubuque. *See* InterVarsity, *Find a Chapter*, <https://intervarsity.org/chapters?state=IA>.

27. InterVarsity’s purpose “is to establish and advance at colleges and universities witnessing communities of students and faculty who follow Jesus as Savior and Lord[.]” *See* InterVarsity, *Our Purpose*, <https://intervarsity.org/about-us/our-purpose>.

28. InterVarsity currently has three chapters at the University of Iowa: InterVarsity Graduate Christian Fellowship, Multiethnic Undergrad Hawkeye InterVarsity (also known as Black Campus Ministries), and International Neighbors.

29. While all three chapters require their student leaders to embrace the chapters’ faith, and have constitutions that make this requirement explicit, only the Graduate chapter was deregistered by the University.

InterVarsity Graduate Christian Fellowship

30. InterVarsity Graduate Christian Fellowship (“InterVarsity”) was founded 25 years ago at the University of Iowa. It celebrated its 25th anniversary at a dinner in May 2018, which featured prayer and presentations by alumni testifying to how InterVarsity helped sustain their faith and improve their academic experience at the University.

31. InterVarsity is a student-led group that helps graduate and professional students and faculty learn more about Christ, grow spiritually, and live faithfully. One of its primary objectives is to invite the University’s academic community to take a fresh look at the life and message of Jesus. It also provides a teaching and fellowshiping community to help Christians from all backgrounds develop as Christian disciples.

32. InterVarsity fulfills its mission at the University in a number of ways. It hosts monthly large-group religious meetings that feature prayer, worship, and religious teaching. It also provides

regular small-group Bible studies which often meet on a weekly or bi-weekly basis. It participates and sponsors activities facilitating campus discussions on important religious and social issues.

33. InterVarsity also supports the University and local communities through a variety of service projects. During the past 25 years, InterVarsity has provided hundreds of hours of service. For instance, for the past sixteen years, InterVarsity has actively participated in the C.R.O.P. Hunger Walk. *See, e.g., Iowa City Crop Hunger Walk, Crop Hunger Walk, <https://www.crophungerwalk.org/iowacityia/ivgcf>.* The C.R.O.P. Hunger Walk is a charity event where teams and individuals walk to raise money, which is then donated to fight hunger around the globe. InterVarsity has been the top fundraiser for six of the past seven years, and has raised over \$54,000 for the C.R.O.P. program.

34. InterVarsity has also partnered with Oxfam to raise funds to alleviate the effects of poverty by conducting “Hunger Banquets.” At times, InterVarsity members have also conducted a Hunger Fast, wherein they have abstained from food for a day and donated the money that they would normally have spent on that day’s meals to Oxfam.

35. InterVarsity has also organized fundraisers for Wild Bill’s Coffee Shop and Uptown Bill’s Coffee Shop, two coffeeshops that are dedicated to providing jobs to those with special needs. *See The University of Iowa School of Social Work, Wild Bill’s Coffeeshop, <https://clas.uiowa.edu/socialwork/resources/wild-bills-coffeeshop> (describing Wild Bill’s as “a service learning project in the School of Social Work at the University of Iowa” which “is operated by adult persons with learning disabilities”); *see also Uptown Bill’s Coffee House, https://www.facebook.com/pg/uptownbills/about/?ref=page_internal (describing Uptown Bill’s as the “crosstown cousin of Wild Bill’s Coffee Shop,” sharing a similar mission).* InterVarsity substituted for the staff of these two venues for an evening, providing free service and*

entertainment, selling their own additional baked goods, and then donating all of the proceeds to the respective coffee shop to assist with their charitable efforts.

36. Each year at Christmas, InterVarsity organizes a food drive to help meet the needs of people served by the Johnson County Crisis Center. Last year alone, InterVarsity donated approximately 160 pounds of food.

37. InterVarsity also regularly participates in the University's annual MLK Day of Service. *See, e.g., The University of Iowa, Leadership and Service Programs, <https://leadandserve.uiowa.edu/programs/mlk/>.*

38. In Spring 2006, InterVarsity was honored with an award from the University for its outstanding services to the student body.

39. InterVarsity welcomes all students and faculty to join its events, including its religious discussions, activities, prayer times, worship services, and Bible studies. It also welcomes all students to join the organization as members. It has members of different religious backgrounds, or no religious background, who attend its Bible studies and other events. InterVarsity is also multiethnic and has many international student members, which helps people from a wide variety of backgrounds feel welcome. Most of the group's regular participants and leaders are women.

40. InterVarsity has always required its leaders to share the group's faith and exemplify its Christian values. Because of the important spiritual role that leaders play, all student leaders must affirm InterVarsity's doctrine and purpose statements. This requirement is stated in InterVarsity's constitution. *See Exhibit A (InterVarsity Graduate Christian Fellowship Constitution).*

41. The InterVarsity constitution spells out the "basic biblical truth of Christianity" that all student leaders must affirm, including its Trinitarian theology and belief in the authority of Scripture; that all humans have inherent dignity and value because they are created in God's image;

that Jesus Christ was divine and sinless; that he died a substitutionary death followed by a bodily resurrection; that people can be saved from their sin and reunited with God by God's grace and through faith in Christ's sacrifice; that God lives in believers in the form of the Holy Spirit; and that all believers are called to unity and to worship together in Christian communities. *Id.* at Art. II.

42. Applicants to serve as student leaders are informed that each official leadership role for InterVarsity "involves significant spiritual commitment." *Id.* at Art. IV at § 3. Thus, "leaders are expected to indicate their agreement with InterVarsity Christian Fellowship/USA's Doctrine and Purpose Statements" and to "exemplify Christ-like character, conduct, and leadership (1 Pet. 5:1-7, 1 Tim. 3:1-13; Gal. 5:19-26; and 1 Cor. 6:7-11)." *Id.*

43. Student leaders are primarily responsible for InterVarsity's ministry on campus. They personally lead many of the religious meetings and Bible studies; lead and participate in prayer, worship, and religious teaching; determine the religious content of meetings; select guest speakers and identify religious topics to cover during events; minister to their peers individually; plan and schedule ministry events on campus; and determine what kind of outreach and service activities to engage in to advance the group's religious mission.

44. Student leaders are helped in their ministry responsibilities by Kevin Kummers, the Senior Campus Minister who advises the InterVarsity Graduate chapter. He meets regularly with each student leader to develop their leadership skills and assist them in providing religious guidance to their peers. He also helps the students learn to lead the various weekly small groups, such as Bible study groups or prayer groups. Kummers has been InterVarsity's advisor for 21 years.

45. An example of InterVarsity's campus ministry is its monthly religious meetings. The meetings last for about two hours. A typical format starts with a time of fellowship while students

arrive, followed by 10-15 minutes of prayer that is generally led by a student leader or Kevin. The group then has 10-15 minutes of worship, which is generally led by student leaders and uses songs selected by student leaders. Worship is followed by an hour of religious teaching and discussion, which is again either led by student leaders or features a guest speaker selected by student leaders. The meeting then typically closes with prayer by a student leader and a brief time of fellowship. The content, format, timing, and location of the meetings are coordinated and led by student leaders; they are responsible for ensuring that the event is conducted in a manner that reflects and is consistent with InterVarsity's faith.

46. Student leaders also oversee and participate in InterVarsity's small-group Bible studies, which often take on a weekly or bi-weekly basis.

47. As a Registered Student Organization, InterVarsity has long received many important rights and benefits from the University that allowed them to host their meetings, attract new students, and serve the community. These rights included the ability to access student orientation activities, especially graduate and international student orientations; the Fall and Spring student organization fairs; a webpage on the University's OrgSync website, which allows the group to connect with students and advertise activities; other University resources to communicate about events; funding; and free campus meeting space.

The University's Policies and Practices

48. The University's written guidelines for student organizations recognize the right of students to organize according to common beliefs and values.

49. For example, the University's published policy regarding "Registration of Student Organizations" states that it is "the policy of the University that all registered student organizations be able to exercise *free choice of members* on the basis of their merits as individuals without restriction in accordance with the University Policy on Human Rights." *See* University of Iowa

Registration of Student Organizations Policy at I(B)(2)(b), <https://dos.uiowa.edu/policies/registration-of-student-organizations/> (“RSO Policy”).

50. The policy further recognizes that students have the right to “organize and associate with like-minded students” and thus that “any individual *who subscribes to the goals and beliefs of a student organization* may participate in and become a member of the organization.” *Id.* (emphasis added).

51. The policy clarifies that student groups like InterVarsity are not an official arm of the University and that registration “does not constitute an endorsement of [the organization’s] program or its purposes, but is merely a charter to exist.” *Id.* at I.

52. The University has further emphasized to student groups that “student organizations are voluntary special interest groups organized for educational, social, recreational, and service purposes,” and that they are “separate legal entities from the University of Iowa and legally are not treated the same as University departments or units.” *Id.*

53. Student organizations at the University frequently require their members to share the missions of the organizations they seek to join.

54. These requirements for members to support their organizations’ missions make sense in light of the University’s goal that student organizations bring “like-minded students” together. *Id.* at I(B)(2)(b).

55. Thus, *preventing* Plaintiffs from creating space for students of like-minded religious beliefs violates, not upholds, the University’s published policies.

56. The University also accommodates other groups’ leadership and membership requirements.

57. The University's Human Rights Policy states that "in no aspect of [the University's] program shall there be differences in the treatment of persons because of race, creed, color, religion, national origin, age, sex, pregnancy, disability, genetic information, status as a U.S. veteran, service in the U.S. military, sexual orientation, gender identity, associational preferences, or any other classification that deprives the person of consideration as an individual." The University of Iowa, *Operations Manual*, Ch. 3.1 Human Rights Policy and Rationale, <https://opsmanual.uiowa.edu/community-policies/human-rights#3.1>.

58. Despite this language, the University allows its 42 registered student sports clubs to require members and leaders to be of a particular sex. For instance, the University's female volleyball club can require all participants to be female, and the University's male ultimate frisbee club can require all participants to be male. The University accordingly does not require sports clubs to comply with the Human Rights Policy against sex-based discrimination.

59. Similarly, the University exempts registered student fraternities and sororities, allowing them to select members and leaders on the basis of their sex.

60. The University of Iowa actively encourages students to join fraternities and sororities despite the fact that they discriminate on the basis of gender. For instance, a University Vice President for Student Life wrote the introduction to a booklet promoting Greek life on campus, stating that "[b]eing a member of a fraternity or sorority provides one of the best ways to becoming an involved student at Iowa." Iowa Fraternity & Sorority Life 2016-2017 at 2, *See* http://iowafsl.publishpath.com/Websites/iowafsl/images/1426-1_-_FSL_2016-2017_Booklet_Updates.pdf.

61. Likewise, Defendant William Nelson stated in a guide for family members of students considering joining Greek organizations that he "encourage[s] [students and families] to look into

what many believe to be the best way to spend your collegiate years – a member of the UI Fraternity and Sorority Community.” See Family Guide: The University of Iowa Fraternity & Sorority Life at 1, <https://fsl.uiowa.edu/assets/Uploads/2082-1-16.75x11.25-FSL-Family-Guide-2017-color-front.pdf>.

62. Fraternities and sororities are governed by the University Policy on Human Rights just as other student organizations are. See RSO Policy at I.G.2 (explaining that rules and regulations of governing social fraternities must be “consistent with the University Policy on Human Rights”).

63. The University has not demonstrated that it cannot accommodate religious organizations by granting them exemptions similar to the ones the University grants to sports clubs, fraternities, and sororities.

64. Indeed, religious accommodation is both required by and consistent with University policy. The University’s Statement of Religious Diversity emphasizes that “[r]eligious history, religious diversity, and spiritual values have formed a part of The University of Iowa’s curricular and extracurricular programs since the founding of the University” and that “[a]s a public institution, the University neither promotes any particular form of religion nor discriminates against students, staff, or faculty on the basis of their religious viewpoints.” Dean of Students, The University of Iowa, *Statement of Religious Diversity*, <https://dos.uiowa.edu/policies/statement-of-religious-diversity-and-the-university-calendar/>.

65. The University’s Human Rights Policy similarly forbids discrimination on the basis of “creed” or “religion,” promising that “equal opportunity and access to facilities shall be available to all,” including in “policies governing programs of extracurricular life and activities.” The University of Iowa, *Operations Manual*, ch. 3.1 Human Rights Policy and Rationale, <https://opsmanual.uiowa.edu/community-policies/human-rights#3.1>.

66. The University's Human Rights Policy also declares that "[c]onsistent with state and federal law, reasonable accommodations will be provided . . . to accommodate religious practices." *Id.*

67. Additionally, the University's RSO Policy states that "[t]he reasons for denying or withdrawing registration of a student organization shall not violate the University Policy on Human Rights," which would preclude withdrawing registration on the grounds of "creed" or "religion." *See* RSO Policy at I.

68. The University has previously admitted that, under these policies, a student religious group is entitled to require a statement of faith as a pre-condition for leading the group and that asking prospective leaders to sign a statement of faith would not violate the Human Rights Policy.

69. Registered student organizations are eligible to receive certain privileges and benefits, which include:

- (a) official status as a University organization;
- (b) establishment of a financial account and purchasing privileges;
- (c) the ability to receive school funding;
- (d) inclusion in University publications;
- (e) use of University organizational software;
- (f) use of the University's trademarks;
- (g) use of campus facilities for meetings;
- (h) use of University fleet services vehicles;
- (i) use of University of staff and programming resources;
- (j) use, once a semester, to use Information Technology Services Mass Mail;
- (k) the ability to apply for honors and awards granted to registered organizations; and
- (l) use of office and storage space.

See RSO Policy at I(A) (listing benefits of registered status).

70. The University also reserves a number of important speech opportunities solely for registered student organizations. Those include:

- a. **Rallies and demonstrations.** See The University of Iowa, *Rallies and Demonstrations*, <https://imu.uiowa.edu/event-services/policies/rallies-and-demonstrations/> (“Student Organizations may host a political rally or demonstration in Hubbard Commons, Hubbard Park, and/or the South Lobby entrance (departments or university guests may not conduct a rally or demonstration)”).
- b. **Digital Displays.** See The University of Iowa, *Online Reservations*, <https://imu.uiowa.edu/event-services/contact-us/> (“Digital Displays are reserved for Registered UI Student Organizations and Departments only”); see also *Digital Displays* <https://imu.uiowa.edu/event-services/policies/digital-display/> (explaining that the displays are “slides [that] run on TV screens throughout the IMU building” and that “[d]igital displays are a designated public forum for registered student organizations and university departments”).
- c. **Chalking.** See The University of Iowa, *Chalking*, <https://imu.uiowa.edu/event-services/policies/chalking/> (“Chalking is defined as the marking of a surface with chalk in order to publicize an upcoming event sponsored by a registered student organization. . . . Only registered student organizations may chalk.”)
- d. **Ground Floor Displays.** See The University of Iowa, *Display Case Guidelines and Policies*, <https://md.studentlife.uiowa.edu/clients/imu-ground-floor-display-case-guidelines-and-policies/> (“Thank you for choosing to advertise your event using the IMU ground floor displays! We’re excited to promote your event and look forward to working with you! Registered student organizations and University departments are allowed to reserve display space on the ground floor of the Iowa Memorial Union (IMU). . . . This is a great opportunity to get the word out about your event for an entire month and make students/faculty more aware of your student organization or department!”).
- e. **Information Tables.** See The University of Iowa, *Information Tables & Bake Sales*, <https://imu.uiowa.edu/event-services/advertising-and-promotion/information-tables/> (“Information tables are provided so that registered student organizations and UI departments may make contact with students for the dissemination of information or to collect funds or other support (e.g., signatures, supplies) from persons outside its membership. . . . University guests or other non-university vendors or companies are not allowed at the information tables for sales-related, fundraising, or commercial activity without being sponsored by a

registered student organization in good standing with the Center for Student Involvement and Leadership”).

- f. **Hubbard Park Fence.** See The University of Iowa, *Hubbard Park Fence*, <https://imu.uiowa.edu/event-services/policies/hubbard-park-fence/> (“Three (3) spaces are available on the Hubbard Park Fence for registered student organizations and university departments to hang signs and/or banners for the purpose of promoting special events or activities occurring on Hubbard Park or in the Iowa Memorial Union.”).

71. The University also reserves a number of financial benefits and opportunities to registered student organizations. These include:

- a. **Bake Sales.** See The University of Iowa, *Bake Sales*, <https://imu.uiowa.edu/event-services/advertising-and-promotion/information-tables/bake-sales/> (“Registered student organizations are permitted to conduct bakes sales in the IMU at specified tabling areas or on Hubbard Park.”).
- b. **Subsidized space rentals.** See The University of Iowa, *Student Organizations*, <https://imu.uiowa.edu/event-services/policies/student-organizations/> (“Registered student organizations in good standing with the Center for Student Involvement and Leadership (CSIL) are eligible to reserve space and receive a subsidized rate for use of the space”). Examples of subsidized rates include:
 - i. The Danforth Chapel. See The University of Iowa, *Danforth Chapel*, <https://imu.uiowa.edu/event-services/outdoor-spaces/danforth-chapel-2/> (free for registered student organizations, \$300 for the general public).
 - ii. The Sunporch. See The University of Iowa, *Sunporch*, <https://imu.uiowa.edu/event-services/spaces/sunporch/> (\$105 rate for registered student organizations, \$525 for the general public);
 - iii. The Black Box Theater. See The University of Iowa, *Black Box Theater – Room #360*, <https://imu.uiowa.edu/event-services/spaces/black-box-theater/> (\$100 rate for registered student organizations; \$400 for the general public).
- c. **University catering discounts.** See The University of Iowa, *Catering*, <https://catering.uiowa.edu/students> (“University Catering has a full menu for student organizations at a discounted rate. . . . Student discounts are only offered to student organizations paying directly out of their student account.”).
- d. **Discounts on audiovisual equipment rental and University services.** See The University of Iowa, *A/V, Equipment, & Services*, <https://imu.uiowa.edu/event->

services/fees/ (listing dozens of discounts for student organizations on a variety of equipment and University services).¹

The University Deregisters InterVarsity

72. On June 1, 2018, InterVarsity's student leaders received an email from the University stating that InterVarsity's existing constitution did not contain the following language verbatim:

In no aspect of its programs shall there be any difference in the treatment of persons on the basis of race, creed, color, religion, national origin, age, sex, pregnancy, disability, genetic information, status as a U.S. veteran, service in the U.S. military, sexual orientation, gender identity, associational preferences, or any other classification which would deprive the person of consideration as an individual. The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons. Eighty percent (80%) of this organization's membership must be composed of UI students.

See Exhibit B.

73. The e-mail stated that if InterVarsity's constitution was not resubmitted with the language included verbatim by June 15, 2018, InterVarsity would be deregistered. *Id.*

74. The email was the first notice that any of InterVarsity's leaders had of the University's position that their constitution was noncompliant or otherwise needed to be updated.

75. The email linked to an FAQ document which stated that all submitted constitutions would be reviewed. See Exhibit C. Organizations that submitted accepted constitutions would receive confirmation of acceptance, and organizations that submitted noncompliant constitutions would be informed as much and told what they needed to change. *Id.* at 1-2.

76. InterVarsity's constitution already included a previous version of the required language, which was substantially identical to the language that the University now required. InterVarsity

¹ The University also allows registered student groups to reserve many specialized rooms at no cost while charging members of the general public \$150 to reserve the rooms. See <https://imu.uiowa.edu/event-services/meetings/wisconsin-room/> (Wisconsin Room); <https://imu.uiowa.edu/event-services/meetings/miller-room/> (Miller Room); <https://imu.uiowa.edu/event-services/meetings/kirkwood-room/> (Kirkwood Room); <https://imu.uiowa.edu/event-services/meetings/river-room-ii/> (River Room Two).

updated its constitution to include the new language, but otherwise made no changes. It submitted the updated constitution on June 2, 2018.

77. On June 12, 2018, the University emailed InterVarsity Graduate Christian Fellowship, informing them that their constitution did not comply with the University's requirements for RSOs, and stating that the University had "sent a few emails, and left a few voicemails, over the past few months" informing the group of the problem. *See* Exhibit D. The University told InterVarsity's student leaders that they had to update their constitution by the next day, June 13, 2018, or be deregistered. *Id.*

78. That same day, Katrina Schrock, the incoming president of InterVarsity, responded to the email and said that she believed her group had already submitted their updated constitution. Andrew Kutcher, the Coordinator for Student Organization Development, replied that an updated constitution was not on file. *Id.* Ms. Schrock accordingly re-submitted the group's constitution, with the required language, and let Mr. Kutcher know. *Id.*

79. That same day, Mr. Kutcher replied to Ms. Schrock and told her that although InterVarsity's constitution included the required language, it was deemed noncompliant because it also contained language limiting "the ability to become a member or to hold leadership positions." *Id.*

80. Ms. Schrock explained to Mr. Kutcher that membership and participation is open to all students without restriction, and that the only restrictions were that leadership must ascribe to InterVarsity's faith. *Id.* She explained that this was because it is "important to have Christian leadership in a Christian organization," since that was necessary "to the fulfillment of our purpose." *Id.*

81. Mr. Kutcher responded that he “recognize[d] the wish to have leadership requirements based on Christian beliefs,” but “[h]aving a restriction on leadership related to religious beliefs is contradictory” to the University’s position. *Id.*

82. Ms. Schrock asked whether it would matter if InterVarsity changed its leadership requirement to be a strong preference that “strongly encouraged” leaders to share InterVarsity’s faith. *Id.* She emphasized that this question was purely provisional and that she would have to talk with her leadership team to see if such a change would be permissible, but she was asking to try to explore potential solutions with the University. *Id.*

83. Mr. Kutcher responded that he would “discuss [the question] with our university attorney.” *See* Exhibit E. About five hours later, he sent a follow-up email to Ms. Schrock stating that he had “just received word that we would not approve the change in language you proposed” because “the University and the Center for Student Involvement and Leadership must enforce our Human Rights Clause when it comes to leadership and membership.” *See* Exhibit D.

84. Mr. Kutcher further stated that InterVarsity would be “deregistered” if it failed to submit a constitution with the required change, and that student groups could only “become reregistered when they submit governing documents compliant with the Human Rights Clause.” *Id.*

85. Over a month later, on Friday July 20, 2018, it was reported that the University had deregistered the InterVarsity along with several other religious organizations including the Christian Pharmacy Fellowship, the Chinese Student Christian Fellowship, the Geneva Campus Ministry, the Imam Mahdi Organization, the J. Reuben Clark Law Society, the Latter-day Saint Student Association, and the Sikh Awareness Club. *See* Vanessa Miller, *The Gazette, University of Iowa deregisters another 38 groups* (July 20, 2018),

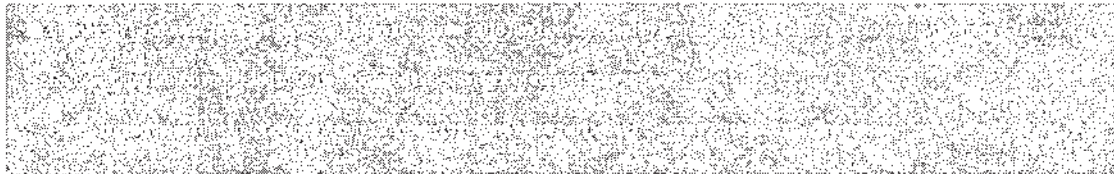
<https://www.thegazette.com/subject/news/education/university-of-iowa-deregisters-another-38-groups-20180720>.

86. Because it had been deregistered, InterVarsity was removed from the University website that the University provides for students to find and join student groups, OrgSync. *See* University of Iowa, Center for Student Involvement & Leadership (2018), <http://uiowa.orgsync.com/>. It is no longer listed on the web page.

87. When InterVarsity's members and leaders attempted to access InterVarsity's OrgSync webpage, which had allowed them to advertise announcements and group information online for interested students, they were confronted with a message that the page had been "disabled" because their group was "Defunct" as of "Summer 2018." *See* <https://orgsync.com/17566/disabled>.



88. When InterVarsity leaders attempted to login to the administrative part of the OrgSync page, they saw a message that their page had been "disabled by the administrators of Center for Student Involvement & Leadership" because InterVarsity had "requested to be de-registered based on lack of interest from students."



89. As the University knows from its discussions with InterVarsity, it is completely false that InterVarsity “requested to be de-registered” or that there was “lack of interest from students.”

90. InterVarsity had about \$200 deposited in its student financial account maintained by the University. The University required InterVarsity to maintain all of its funds in that account. Some of the funds were derived from University sources; some were given by student members to support InterVarsity’s religious mission. When the University deregistered InterVarsity, it also froze those funds and has denied InterVarsity access to them.

91. Upon information and belief, the University had received no complaints about the Student Groups’ leadership selection policies and practices.

92. The two other InterVarsity groups on campus—International Neighbors and Black Campus Ministries—also submitted constitutions before the June 15 deadline that included the required verbatim language *and* the same Christian leadership requirements that the University relied on to deregister the InterVarsity Graduate chapter. Both those other groups are still registered, though neither ever heard back from the University either accepting or rejecting their constitutions. *See* Exhibit C at 1-2 (stating that the University would respond to submitted constitutions with either acceptance or rejection).

93. Deregistration harms InterVarsity in a number of ways. In addition to the harm of having its First Amendment rights violated and suffering discriminatory stigma, it also prevents InterVarsity from having equal access to graduate and professional students during student orientation events and student organization fairs, or via communication mediums controlled by the University (such as OrgSync, informational tables, sidewalks, and digital and physical messaging boards). Further, a significant percentage of the population that InterVarsity serves is international students, who are particularly less likely to join a group that is not registered by the University both because of access issues and because of the stigma associated with deregistration. And because many of InterVarsity's participants and leaders are commuters, being denied equal access to meeting space uniquely hampers their ability to reach students who are only on campus for short periods of time.

94. The University recently released student activity calendars showing that the Graduate Student Fair is on August 15, 2018, and the Registered Student Organization Fair is on August 30, 2018.

CLAIMS

COUNT I

42 U.S.C. § 1983

Violation of the First Amendment to the U.S. Constitution Free Exercise & Establishment Clauses Ministerial Exception

95. Plaintiffs incorporate by reference all preceding paragraphs.

96. Under the Free Exercise and Establishment Clauses of the First Amendment, religious groups have the right to select their leaders without government interference. *See Hosanna-Tabor Evangelical Lutheran Church & School v. EEOC*, 565 U.S. 171 (2012).

97. Plaintiffs are religious organizations created to provide Christian ministry to students.

98. Plaintiffs' leaders provide spiritual ministry by leading the study of scripture, prayers, and worship, and by selecting ways that their group can serve in the community and with other religious ministries as a means of expressing and developing its faith.

99. Plaintiffs' leaders are selected based upon their agreement with their organization's religious beliefs, their willingness to live according to those beliefs, and their ability to express those beliefs effectively.

100. Plaintiffs' leaders are the primary means by which the group shares its religious beliefs with others and are responsible for determining how it will express its faith to others. Their leaders embody its faith.

101. By threatening to revoke Plaintiffs' status as a registered student group, with the rights, benefits, and privileges that flow from that status, unless the Plaintiffs revise their statements of faith and modify their leadership standards, the University infringes their First Amendment rights to select their own leaders.

102. By limiting Plaintiffs' ability to select their own leaders, the University also impermissibly entangles itself in the Plaintiffs' internal religious beliefs and internal religious affairs.

103. Absent injunctive and declaratory relief against the University, the Plaintiffs have been and will continue to be irreparably harmed.

COUNT II

42 U.S.C. § 1983

Violation of the First Amendment to the U.S. Constitution

Free Exercise & Establishment Clauses

Internal Autonomy

104. Plaintiffs incorporate by reference all preceding paragraphs.

105. Under the Free Exercise and Establishment Clauses of the First Amendment, religious groups have the “power to decide for themselves, free from state interference, matters of church government as well as those of faith and doctrine.” *Kedroff v. Saint Nicholas Cathedral of Russian Orthodox Church in N. Am.*, 344 U.S. 94, 116 (1952).

106. Plaintiffs are religious organizations created to establish a community on campus that helps students and faculty learn more about Christ, grow spiritually, and live faithfully.

107. The Statement of Faith adopted in Plaintiffs’ constitution sets forth their core religious beliefs that define their mission, guide their work, and help them select their leadership.

108. Plaintiffs require their leaders to affirm the Statement of Faith to ensure that they are committed to the group’s mission and are capable of authentically conveying the group’s beliefs to other members.

109. Plaintiffs’ means of selecting their leadership is calibrated toward installing individuals who share and can express the group’s faith.

110. By conditioning access to registered student group status, along with the rights, benefits, and privileges that flow from that status, on an agreement to revise their internal method of selecting religious leaders, the University infringes Plaintiffs’ First Amendment right to determine the content of their faith and to govern themselves regarding the expression of their faith to their members.

111. Absent injunctive and declaratory relief against the University, Plaintiffs and their members have been and will continue to be irreparably harmed.

COUNT III

42 U.S.C. § 1983
Violation of the First Amendment to the U.S. Constitution
Free Exercise Clause
Religious Animus/Targeting of Religious Beliefs

112. Plaintiffs incorporate by reference all preceding paragraphs.

113. “[A] law targeting religious beliefs as such is never permissible.” *Trinity Lutheran Church of Columbia, Inc. v. Comer*, 137 S. Ct. 2012, 2024 n.4 (2017) (quoting *Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 533 (1993)).

114. The government has no authority to control the content of or the expression of religious beliefs within the context of private religious associations. *Braunfeld v. Brown*, 366 U.S. 599, 603 (1961) (“The freedom to hold religious beliefs and opinions is absolute.”).

115. The University deregistered Plaintiff InterVarsity because the University claims that its leadership policies violate the University’s position regarding its Human Rights policy.

116. Other student organizations at the University are permitted to select their leadership, and even membership, on the basis of their values, purposes, and beliefs. This is true even when it results in excluding potential members or leaders on the basis of a class that is enumerated in the University’s Human Rights policy.

117. The University knows that it is unlawful to penalize Plaintiffs because of the content of their religious beliefs.

118. By stripping Plaintiff InterVarsity’s registered status because of its religious leadership requirements, the University is targeting and seeking to control Plaintiffs’ religious beliefs as such, which violates the Free Exercise Clause of the First Amendment to the United States Constitution.

119. The University’s actions reflect animus toward religion, and Plaintiffs’ religious beliefs in particular.

120. Absent injunctive and declaratory relief against the University, Plaintiffs and their members have been and will continue to be irreparably harmed.

COUNT IV

**42 U.S.C. § 1983
Violation of the First Amendment to the U.S. Constitution
Free Exercise Clause
Not Generally Applicable**

121. Plaintiffs incorporates by reference all preceding paragraphs.

122. “[L]aws burdening religious practice must be of general applicability.” *Lukumi*, 508 U.S. at 542.

123. The University’s position regarding student group leadership selection is not applied to or enforced equally against all student organizations.

124. The Human Rights Policy requires that membership and participation in student organizations must be open to all students without regard to “race, creed, color, religion, national origin, age, sex, pregnancy, disability, genetic information, status as a U.S. veteran, service in the U.S. military, sexual orientation, gender identity, associational preferences, or any other classification that deprives the person of consideration as an individual” and that “equal opportunity and equal access to facilities shall be available to all.”

125. Many student organizations on campus, including fraternities and sororities, explicitly restrict membership and/or leadership on the basis of one or more of the categories identified in the Human Rights Policy.

126. Many student organizations on campus have an uninterrupted pattern of restricting membership and/or leadership on the basis of one or more of the categories identified in the Human Rights Policy.

127. The University has failed to consistently enforce the Human Rights Policy against student organizations that restrict membership and/or leadership on the basis of one or more of the categories identified in the Human Rights Policy.

128. Plaintiffs do not restrict *membership* on the basis of any of the categories identified in the Human Rights Policy, and they do not restrict *leadership* on the basis of any of the categories identified in the Human Rights Policy other than on the basis of religion.

129. By stripping Plaintiff InterVarsity of its registered student organization status because of its religious leadership standards, the University is applying a standard to InterVarsity that is not generally applicable to other student organizations on campus.

130. The University's enforcement position is under-inclusive in that it fails to restrict nonreligious conduct that endangers the University's stated interests in a similar or greater degree than does Plaintiffs' conduct.

131. The University does not have a compelling government interest pursued by the least restrictive means to justify this unequal position against Plaintiffs.

132. The University's discriminatory position violates the Free Exercise Clause of the First Amendment to the United States Constitution.

133. Absent injunctive and declaratory relief against the University, Plaintiffs and their members have been and will continue to be irreparably harmed.

COUNT V

42 U.S.C. §1983

Violation of the First Amendment to the U.S. Constitution

Establishment Clause

Denominational Discrimination

134. Plaintiffs incorporate by reference all preceding paragraphs.

135. “The clearest command of the Establishment Clause is that one religious denomination cannot be officially preferred over another.” *Larson v. Valente*, 456 U.S. 228, 244 (1982).

136. The University seeks to penalize Plaintiffs because of their religious beliefs.

137. The University has not penalized some other religious groups on campus for their religious beliefs and leadership selection.

138. The University’s preference for some religious beliefs and leadership selection practices over Plaintiffs’ religious beliefs and leadership selection practices violates the Establishment Clause of the First Amendment to the United States Constitution.

139. Absent injunctive and declaratory relief against the University, the Student Groups and their members have been and will continue to be irreparably harmed.

COUNT VI

42 U.S.C. §1983

Violation of the First Amendment to the U.S. Constitution

Free Speech Clause

Expressive Association

140. Plaintiffs incorporate by reference all preceding paragraphs.

141. Applying the University’s position to Plaintiffs would compel the groups to select leaders who do not share or live out the groups’ religious beliefs.

142. Plaintiffs are associations of like-minded Christians who seek to express their Christian faith through word and deed.

143. Plaintiffs believe that their activities and organization are a witness of their members’ faith and thus inherently expressive, having inescapable religious significance.

144. Causing Plaintiffs to accept leaders who do not believe and act in accordance with Plaintiffs’ religious beliefs would force them to associate with and promote a message with which

they disagree and which runs contrary to the expressive purposes for which the Plaintiffs were created and operate.

145. Compelling Plaintiffs to associate with and promote a message with which they disagree and which runs contrary to the expressive purposes for which they were created and operate is not narrowly tailored to a compelling governmental interest.

146. Compelling Plaintiff InterVarsity to associate with leaders who do not believe and act in accordance with its religious beliefs would put into jeopardy its status as a chapter of the national InterVarsity organization and deprive the chapter of the opportunity to associate with likeminded believers.

147. Defendants' actions thus violate Plaintiffs' right of expressive association as secured to it by the First Amendment of the United States Constitution.

148. Absent injunctive and declaratory relief against the University's position, Plaintiffs and their members have been and will continue to be irreparably harmed.

COUNT VII

42 U.S.C. § 1983

Violation of the First Amendment to the U.S. Constitution

Free Speech Clause

Compelled Speech

149. Plaintiffs incorporates by reference all preceding paragraphs.

150. Applying the University's position to Plaintiffs would force them to accept leaders who do not share the group's faith and allow those leaders to pray, worship, teach, lead, and speak on behalf of the group.

151. This forced inclusion of leaders who may not share Plaintiffs' religious beliefs and mission would communicate both to Plaintiffs' own members as well as to the community at large that Plaintiffs' views are different than what they actually espouse.

152. Defendants' actions would thus violate Plaintiffs' right to be free from compelled speech as secured to them by the First Amendment of the United States Constitution.

153. Compelling Plaintiffs to convey messages that they disagree with is not narrowly tailored to a compelling governmental interest.

154. Absent injunctive and declaratory relief against such compelled speech, Plaintiffs and their members have been and will continue to be irreparably harmed.

COUNT VIII

42 U.S.C. §1983

Violation of the First Amendment to the U.S. Constitution

Free Speech Clause

Viewpoint Discrimination

155. Plaintiffs incorporate by reference all preceding paragraphs.

156. Governmental efforts to regulate speech based on the "specific motivating ideology or the opinion or perspective of the speaker" is a "blatant" and "egregious" form of impermissible speech restriction. *Rosenberger v. Rector & Visitors of the Univ. of Va.*, 515 U.S. 819, 829 (1995).

157. The University seeks to discriminatorily penalize Plaintiffs because of their religious opinions and perspectives.

158. Discriminating against Plaintiffs' expressed religious opinions and perspectives is not narrowly tailored to a compelling governmental interest.

159. Absent injunctive and declaratory relief against the University, Plaintiffs and their members have been and will continue to be irreparably harmed.

COUNT IX

42 U.S.C. § 1983

Violation of the First Amendment to the U.S. Constitution

Assembly Clause

160. Plaintiffs incorporate by reference all preceding paragraphs.

161. By denying Plaintiff InterVarsity registered student group status because of its religious leadership requirements, the University infringes on Plaintiffs' First Amendment right to "peaceably to assemble" to engage in otherwise lawful religious worship and speech activities with persons of their choosing. *See Thomas v. Collins*, 323 U.S. 516, 530–40 (1945).

162. The University allows other student groups with a wide variety of ideological tenets and a wide variety of restrictions on membership and leadership to use University resources to assemble on campus.

163. Without registered student group status, Plaintiff InterVarsity is denied University resources that are important for it to be able to meet, share its message, and grow its membership. These resources are available to other registered student groups.

164. Absent injunctive and declaratory relief, Plaintiffs and their members have been and will continue to be irreparably harmed.

COUNT X

42 U.S.C. § 1983

**Violation of the Fourteenth Amendment to the U.S. Constitution
Equal Protection**

165. Plaintiffs incorporate by reference all preceding paragraphs.

166. The Equal Protection Clause prohibits discrimination on the basis of religion.

167. The University's position penalizes Plaintiffs because of their religious beliefs by denying Plaintiff InterVarsity registered status while allowing other religious and non-religious groups with leadership and membership qualifications to maintain registered status.

168. Organizations that espouse religious beliefs contrary to those espoused by Plaintiffs are allowed to maintain registered status.

169. Other organizations that limit membership or leadership on the basis of a class that is listed in the University's Human Rights policy are allowed to maintain registered status.

170. By preferring some types of membership and leadership requirements over Plaintiffs' leadership requirements, the University violates the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution.

171. Absent injunctive and declaratory relief, Plaintiffs and their members have been and will continue to be irreparably harmed.

COUNT XI

Violation of the Iowa Human Rights Act

172. Plaintiffs incorporates by reference all preceding paragraphs.

173. Section 216.9 of the Iowa Human Rights Act declares that "[i]t is an unfair or discriminatory practice for any educational institution to discriminate on the basis of . . . religion."

174. Such discrimination includes "[e]xclusion of a person or persons from participation in, denial of the benefits of, or subjection to discrimination in any . . . extracurricular . . . or other program or activity." *Id.* at § 216.9(a).

175. The University has discriminated against Plaintiffs, their leadership, and their members on account of their religious beliefs and religious practices.

176. Further, by deregistering Plaintiff InterVarsity, the University is denying Plaintiff InterVarsity the ability to fully participate in University life on equal grounds with all other student groups.

177. Such denials constitute a violation of the Iowa Human Rights Act.

178. Absent injunctive and declaratory relief on the grounds that the University has violated the Iowa Human Rights Act, Plaintiffs and their members have been and will continue to be irreparably harmed.

COUNT XII

**Violation of the Iowa Constitution Article I, § 3
Free Exercise Clause**

179. Plaintiffs incorporate by reference all preceding paragraphs.

180. Article I, § 3 of the Iowa Constitution provides that “[t]he General Assembly shall make no law . . . prohibiting the free exercise” of religion.

181. Plaintiffs exercise their religion when they select leaders who embrace and follow their beliefs.

182. The University, an arm of the State of Iowa, substantially burdens Plaintiffs’ free exercise of religion by denying Plaintiff InterVarsity registered status, and the benefits that come with that status, because Plaintiffs require their leaders to embrace and follow their religious beliefs.

183. A decree forcing Plaintiffs to have leaders who believe and act in direct contradiction to their religious beliefs, or lose registered status, would not be narrowly tailored to accomplishing a compelling government interest.

184. Forcing Plaintiffs to have leaders who believe and act in direct contradiction to their religious beliefs, or lose registered status, would violate the rights secured to them by Article I, § 3 of the Iowa Constitution.

185. Absent injunctive and declaratory relief against the University’s enforcement of its position, Plaintiffs and their members have been and will continue to be irreparably harmed.

COUNT XIII

**Violation of the Iowa Constitution Article I, § 4
No Punishment for Religious Beliefs**

186. Plaintiffs incorporate by reference all preceding paragraphs.

187. Article I, § 4 of the Iowa Constitution provides that “no person shall be deprived of any of his rights, privileges, or capacities, or disqualified from the performance of any of his public or private duties . . . in consequence of his opinions on the subject of religion[.]”

188. Applying the University’s position against Plaintiffs for selecting leaders who endorse and abide by their religious beliefs would punish Plaintiffs and their members for their religious beliefs in violation of the rights secured to them by Article I, § 4 of the Iowa Constitution.

189. Absent injunctive and declaratory relief against Defendants’ enforcement of its position, Plaintiffs and their members have been and will continue to be irreparably harmed.

COUNT XIV

**Violation of the Iowa Constitution Article I, § 7
Compelled Speech**

190. Plaintiffs incorporate by reference all preceding paragraphs.

191. Article I, § 7 of the Iowa Constitution provides that “Every person may speak, write, and publish his sentiments on all subjects, being responsible for the abuse of that right. No law shall be passed to restrain or abridge the liberty of speech.”

192. Applying the University’s position to Plaintiffs would force them to accept leaders who do not share their faith, and force them to allow those leaders to teach Bible studies, lead prayer, worship, and other outreach activities, and generally carry the groups’ message.

193. This forced inclusion of leaders who do not share Plaintiffs' religious beliefs and mission would communicate both to Plaintiffs' own members as well as to the community at large that Plaintiffs' beliefs are insincere and are different than what they actually espouse.

194. Defendants' actions would thus violate Plaintiffs' right to be free from compelled speech as secured to them by Article 1, § 7 of the Iowa Constitution.

195. Compelling Plaintiffs to convey messages that they disagree with is not narrowly tailored to a compelling governmental interest.

196. Absent injunctive and declaratory relief against such compelled speech, Plaintiffs and their members have been and will continue to be harmed.

COUNT XV

Violation of the Iowa Constitution Article I, § 7 Viewpoint Discrimination

197. Plaintiffs incorporate by reference all preceding paragraphs.

198. Governmental efforts to regulate speech based on the viewpoint of the speaker are impermissible viewpoint discrimination.

199. The University seeks to penalize Plaintiffs because of their religious opinions and perspectives.

200. The University's position privileges the expression and views of groups that have different beliefs and perspectives.

201. The University's preference for one set of opinions and perspectives about religious leadership and against Plaintiffs' religious beliefs violates Article I, Section 7 of the Iowa Constitution.

202. Discriminating against Plaintiffs' expressed religious opinions and perspectives is not narrowly tailored to a compelling governmental interest.

203. Absent injunctive and declaratory relief against the University, Plaintiffs and their members have been and will continue to be irreparably harmed.

COUNT XVI

**Violation of the Iowa Constitution Article I, § 7
Expressive Association**

204. Plaintiffs incorporate by reference all preceding paragraphs.

205. Applying the University's position to Plaintiffs would compel them to select leaders who believe and live in contradiction to Plaintiffs' religious beliefs.

206. Plaintiffs are associations of like-minded Christians who seek to express their Christian faith through word and deed.

207. Plaintiffs believe that their activities and organization are a witness of their faith and thus inherently expressive, having inescapable religious significance.

208. Causing Plaintiffs to accept leaders who do not believe and act in accordance with Plaintiffs' religious beliefs would force the groups to associate with and promote a message with which it disagrees and which runs contrary to the expressive purposes for which Plaintiffs were created and operate.

209. Defendants' actions thus would violate Plaintiffs' right of expressive association as secured to it by Article I, Section 7 of the Iowa Constitution.

210. Absent injunctive and declaratory relief against the University's position, Plaintiffs and its members have been and will continue to be harmed.

COUNT XVII

**Violation of Article I, § 20 of the Iowa Constitution
Assembly Clause**

211. Plaintiffs incorporate by reference all preceding paragraphs.

212. Article I, § 20 of the Iowa Constitution provides that “The people have the right freely to assemble together to counsel for the common good; to make known their opinions to their representatives and to petition for a redress of grievances.”

213. The University infringes on Plaintiffs’ right of assembly by denying Plaintiff InterVarsity registered status because of their religious decision to require their leaders to share their religious beliefs.

214. Without registered student group status, Plaintiff InterVarsity is not eligible to use University resources to meet, share the Plaintiffs’ message, or grow their membership numbers.

215. Absent injunctive and declaratory relief against such compelled speech, Plaintiffs and their members have been and will continue to be harmed.

PRAYER FOR RELIEF

Wherefore, Plaintiffs request that the Court:

- a. Declare that the First and Fourteenth Amendments to the United States Constitution, the Iowa Constitution, and the Iowa Human Rights Act require Defendants to cease discriminating against Plaintiffs and to cease withholding registered student organization status on the basis of Plaintiffs’ religious leadership selection policies.
- b. Issue an injunction prohibiting the University from denying Plaintiffs registered student organization status based on the content of their religious leadership selection policies.
- c. Award Plaintiffs damages and nominal damages for the loss of their rights as protected by the United States and Iowa Constitutions.
- d. Award Plaintiffs the costs of this action and reasonable attorney’s fees; and

- e. Award such other and further relief as the Court deems equitable and just.

JURY REQUEST/DEMAND

Plaintiffs request a trial by jury on all issues so triable.

Respectfully submitted,

/s/ Matt M. Dummermuth

Matt M. Dummermuth
Hagenow Gustoff & Dummermuth, LLP
600 Oakland Rd. NE
Cedar Rapids, IA 52402
(319) 849-8390 phone
(888) 689-1995 fax
mdummermuth@whgllp.com

Eric S. Baxter*

Lead Counsel

Daniel H. Blomberg*
The Becket Fund for Religious Liberty
1200 New Hampshire Ave. NW, Suite 700
Washington, DC, 20036
(202) 955-0095 PHONE
(202) 955-0090 FAX
ebaxter@becketlaw.org
dblomberg@becketlaw.org

Counsel for Plaintiff

**Admission pro hac vice pending*



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

- COURT REPORTING
- LEGAL VIDEOGRAPHY
- VIDEOCONFERENCING
- TRIAL PRESENTATION
- MOCK JURY SERVICES
- LEGAL TRANSCRIPTION
- COPYING AND SCANNING
- LANGUAGE INTERPRETERS

INTERVARSITY CHRISTIAN FELLOWSHIP/USA, et al.,

Plaintiffs,

vs. Civil Action No. 18-cv-00080-SMR-SBJ

THE UNIVERSITY OF
IOWA, et al.,

Defendants.



DEPOSITION AND TRIAL



(800) 528-3335

NAEGELIUSA.COM

DEPOSITION OF
KATRINA SCHROCK

TAKEN ON
THURSDAY, MARCH 28, 2019
9:18 A.M.

UNIVERSITY PARK RESEARCH CENTER
2500 CROSSPARK ROAD, ROOM W219
CORALVILLE, IOWA 52241

IVCF App. 2617

IVCF App 2226

2	4
<p>1 APPEARANCES</p> <p>2</p> <p>3 APPEARING ON BEHALF OF THE PLAINTIFFS:</p> <p>4 Daniel H. Blomberg, Esquire</p> <p>5 THE BECKET FUND FOR RELIGIOUS LIBERTY</p> <p>6 1124 Park West Boulevard, Suite 204</p> <p>7 Mt. Pleasant, SC 29466</p> <p>8 (202) 349-7222</p> <p>9 (202) 955-0090 (Fax)</p> <p>10 dblomberg@becketlaw.org</p> <p>11</p> <p>12 Eric Baxter, Esquire</p> <p>13 THE BECKET FUND FOR RELIGIOUS LIBERTY</p> <p>14 1200 New Hampshire Avenue NW, Suite 700</p> <p>15 Washington, D.C. 20036</p> <p>16 (202) 955-0095</p> <p>17 (202) 955-0090 (Fax)</p> <p>18 ebaxter@becketlaw.org</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 INDEX</p> <p>2 Page</p> <p>3</p> <p>4 EXAMINATION BY MR. CARROLL 7</p> <p>5</p> <p>6 EXAMINATION BY MR. BLOMBERG 54</p> <p>7</p> <p>8 FURTHER EXAMINATION BY MR. CARROLL 59</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
3	5
<p>1 APPEARANCES CONTINUED</p> <p>2</p> <p>3 APPEARING ON BEHALF OF THE DEFENDANTS:</p> <p>4 George A. Carroll, Esquire</p> <p>5 Iowa Attorney General's Office</p> <p>6 1305 East Walnut Street</p> <p>7 Des Moines, IA 50319</p> <p>8 (515) 281-4931</p> <p>9 George.carroll@ag.iowa.gov</p> <p>10</p> <p>11 Nathan E. Levin, Esquire</p> <p>12 OFFICE OF THE GENERAL COUNSEL, UNIVERSITY OF IOWA</p> <p>13 120 Jessup Hall</p> <p>14 Iowa City, IA 52242</p> <p>15 (319) 384-3340</p> <p>16 (319) 335-2830 (Fax)</p> <p>17 Nathan-levin@uiowa.com</p> <p>18</p> <p>19 ALSO PRESENT:</p> <p>20 Kevin Kummer</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 EXHIBITS</p> <p>2 Exhibit Page</p> <p>3</p> <p>4 4 EMAIL STRING 43</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

6

1 DEPOSITION OF
 2 KATRINA SCHROCK
 3 TAKEN ON
 4 THURSDAY, MARCH 28, 2019
 5 9:18 A.M.
 6
 7 KATRINA SCHROCK, having been first duly sworn, was
 8 examined and testified as follows:
 9 MR. CARROLL: Before we begin I want to
 10 make a statement on the record.
 11 Previously, earlier this morning I deposed
 12 Mr. Kummer, who is associated with InterVarsity
 13 Christian Fellowship. He is now present in the room
 14 for the deposition of Ms. Schrock. Counsel –
 15 opposing counsel has indicated that he's the
 16 corporate representative and that's why he's present
 17 in this room. And I'm going to make the record that
 18 then that will be the corporate representative at
 19 trial because he is subject to recall for further
 20 testimony and he would be subject to ordinary
 21 sequestration rules under the Federal Rules of Civil
 22 Procedure.
 23 So that is my record.
 24 MR. BLOMBERG: And then can I speak to
 25 that?

7

1 So the plaintiff asked for Mr. Kummer to
 2 stay because he's a minister to Ms. Katrina Schrock,
 3 who this is her first deposition. She's nervous and
 4 we were told the only condition on which he could
 5 stay was if the university could say he was their
 6 corporate representative and had to agree to him
 7 being at trial. The university is unwilling to
 8 allow him to stay, to be here to provide comfort in
 9 just his presence other than through that condition.
 10 Without anything further, Mr. Carroll.
 11 MR. CARROLL: If you could swear the
 12 witness, please.
 13 THE REPORTER: I already did.
 14 MR. CARROLL: Oh, yeah, sorry.
 15 EXAMINATION
 16 BY MR. CARROLL:
 17 Q. Will you state your full name for the
 18 record?
 19 A. My name is Katrina Nicole Schrock.
 20 Q. Okay. And Ms. Schrock, counsel has
 21 indicated you've never had your deposition taken
 22 before?
 23 A. Never.
 24 Q. I'm sure your attorneys have gone through
 25 kind of the guidelines but I want to go through some

8

1 of them.
 2 Let me finish my question before you speak
 3 so that we're not speaking at the same time. Okay?
 4 If I ask you for a yes or no style of question,
 5 please provide a yes or no answer as opposed to a
 6 mm-hmm or nodding the head that we're used to in
 7 normal conversations. And finally, if you don't
 8 understand my question, just ask me to rephrase it.
 9 Okay?
 10 A. Yes.
 11 Q. Okay. Ms. Schrock, what is your status
 12 with the University of Iowa?
 13 A. I am a graduate student.
 14 Q. In what program?
 15 A. I'm in the physics program.
 16 Q. And are you an employee of the University
 17 of Iowa?
 18 A. I am an employee.
 19 Q. Are you a TA or RA?
 20 A. I am an RA.
 21 Q. Okay. And where did you go to undergrad?
 22 A. I attended undergrad at Messiah College in
 23 Pennsylvania.
 24 Q. Did you come directly to the University of
 25 Iowa to attend graduate school?

9

1 A. Yes, I did.
 2 Q. Are you in the Master's program or Ph.D.?
 3 A. I am in the Ph.D. program.
 4 Q. And what level are you, what stage are
 5 you?
 6 A. I'm currently in my third year.
 7 Q. Okay. What is your role with – and I'm
 8 just going to shorten it to InterVarsity if that's
 9 okay.
 10 A. That is okay with me.
 11 Q. Okay. So what is your role with
 12 InterVarsity on the University of Iowa campus?
 13 A. I am serving as the student president of
 14 the university chapter of InterVarsity.
 15 Q. Okay. Were you involved in InterVarsity
 16 in undergraduate college?
 17 A. I was not.
 18 Q. Okay. Is your first involvement with
 19 InterVarsity at the University of Iowa?
 20 A. Yes, it is.
 21 Q. How did you become involved in
 22 InterVarsity?
 23 A. The previous president of InterVarsity
 24 invited me to an event.
 25 Q. Okay. And do you recall when – when your

10	<p>1 first interaction with InterVarsity was?</p> <p>2 A. October 2017.</p> <p>3 Q. Okay. Did you otherwise know the -- the</p> <p>4 previous president?</p> <p>5 A. Yes, I did.</p> <p>6 Q. Okay. Through school or just the</p> <p>7 university community?</p> <p>8 A. We attend church together.</p> <p>9 Q. Okay. Did you become a member of</p> <p>10 InterVarsity in the timeframe of fall of 2017?</p> <p>11 A. Yes, I did.</p> <p>12 Q. And what was your membership at that time?</p> <p>13 A. I was an attendee.</p> <p>14 Q. Okay. Is there a -- generally the same</p> <p>15 physical location for meetings?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Where is that?</p> <p>18 A. We meet typically at First Mennonite</p> <p>19 Church.</p> <p>20 Q. And I'm familiar with the University of</p> <p>21 Iowa, or excuse me, Iowa City. Where is that?</p> <p>22 A. It's near -- it's on Myrtle. Myrtle and</p> <p>23 Greenwood, that intersection.</p> <p>24 Q. Okay. What is your current role with</p> <p>25 InterVarsity?</p>	12
11	<p>1 A. As I stated, I am the student president of</p> <p>2 the Iowa chapter.</p> <p>3 Q. And what does the student president mean?</p> <p>4 A. I interact with the university on behalf</p> <p>5 of InterVarsity. The InterVarsity chapter. I also</p> <p>6 help to organize events and other aspects of regular</p> <p>7 InterVarsity scheduling.</p> <p>8 Q. Is there any individual, one or two</p> <p>9 individuals at Iowa -- when I say Iowa, I mean the</p> <p>10 University of Iowa. Are there any individuals that</p> <p>11 you regularly work with as president?</p> <p>12 A. I have regularly communicated with Andy</p> <p>13 Kutcher and the Student Organizations staff in</p> <p>14 general.</p> <p>15 Q. Okay. When you communicate, is it email</p> <p>16 or in person?</p> <p>17 A. Typically it's email communication.</p> <p>18 Q. Okay. Have you been to the Student</p> <p>19 Organizations or Center for Student Life in the</p> <p>20 Union?</p> <p>21 A. Yes, I have.</p> <p>22 Q. Okay. Was that related to InterVarsity?</p> <p>23 A. Yes, it was.</p> <p>24 Q. Okay. How many times have you been to the</p> <p>25 Union for that purpose?</p>	13

14

1 of June 1, 2018?

2 A. Yes, I did.

3 Q. And how would you receive this – this

4 seems to be a generic email to all groups. How

5 would you receive it?

6 MR. BLOMBERG: Just when you say generic

7 email to all groups, it does specific InterVarsity

8 Christian Fellowship just to clarify.

9 BY MR. CARROLL:

10 Q. All right. So would it go to – would it

11 go to your, what I'll call – do you have a student

12 email account?

13 A. I do.

14 Q. And is there an InterVarsity email

15 account?

16 A. There is not to my knowledge.

17 Q. So if you received this on or about June

18 1, 2018, where would it go?

19 A. At that point it would have gone to the

20 previous leaders because we were in a transitional

21 period.

22 Q. Okay. But, so for example, if you can

23 answer this, if you got something today, would it go

24 to your University of Iowa student email account?

25 A. Yes, it would.

15

1 Q. Okay. And that's the email account that

2 you get all kinds of notices from Iowa, right?

3 A. Yes, it is.

4 Q. Like yesterday you got a notice there was

5 going to be a tornado siren drill, right?

6 A. Yes.

7 Q. I mean, you read it, didn't you? So you

8 know what I'm asking. So everything related to

9 InterVarsity is coming to your student email

10 account?

11 A. Yes, it is.

12 Q. Does the University of Iowa have – well,

13 let me back up.

14 Do you have a personal email account?

15 A. I do.

16 Q. Does the University of Iowa related to

17 InterVarsity ever use your personal email account to

18 contact you?

19 A. They do not.

20 Q. What, if anything, did you do with this

21 email upon receipt?

22 A. I did not personally do anything with this

23 email.

24 Q. And do you know where the email went?

25 A. Could you clarify the question?

16

1 Q. It has – whoever it's to has been

2 redacted. Do you – you didn't do anything personal

3 with it. Do you know where this email went? Or to

4 whom, actually?

5 A. As I stated, it would have gone to

6 previous leaders.

7 Q. Okay. And today, if the University of

8 Iowa were to contact you as the president of

9 InterVarsity, would they also send it to others or

10 would they expect you to distribute to other

11 leaders, if you know?

12 A. I'm not certain but I believe that they

13 would send it to myself, perhaps the other leaders,

14 but definitely at least to myself and then expect it

15 to get to the group that way.

16 Q. And so this Exhibit B, did you take – did

17 you personally take any action to respond to the

18 University of Iowa?

19 A. I personally did not take any action to

20 respond to this specific email.

21 Q. Okay. And if you could look to Exh bit 2,

22 please.

23 And again, go to the first – second page

24 but first page.

25 A. Mm-hmm.

17

1 Q. Okay. And are you familiar with this

2 email?

3 A. Yes, I am.

4 Q. And it's from Mr. Kutcher to you, correct?

5 A. That is correct.

6 Q. And actually, email chains, we have to go

7 to – kind of to the last page.

8 So if we work from that – and if we just

9 look at the very last page, do you know who Laurynn

10 King is?

11 A. Yes, I do.

12 Q. Okay. Who is she?

13 A. She works with the Student Organizations

14 Office, CSIL. I don't know what that stands for but

15 it's the Student Life.

16 Q. If we both call it Student Life we know

17 what we're talking about?

18 A. Yes.

19 Q. All right. Thank you.

20 So if we go to the next page in, at the

21 bottom it's from Laurynn King. The to is redacted.

22 Do you know if you were the recipient of this email?

23 A. I was not.

24 Q. And was it the previous leadership at this

25 point still?

18

1 A. Yes, it was.

2 Q. Okay. Were you involved in the potential

3 response to the University of Iowa?

4 A. Could you clarify what you mean by "the

5 potential response"?

6 Q. Based on this email that you testified you

7 didn't – you're not the recipient, were you

8 involved in trying to respond to it?

9 A. Yes, I was.

10 Q. And how did that involvement come about?

11 A. The previous leaders forwarded the email

12 to the current leadership team.

13 Q. And that forwarding still is going through

14 university accounts?

15 A. Yes, it is.

16 Q. Okay. And so when we go to the next page,

17 there we have – it's to Laurynn King and it appears

18 to be – it's all related to this email chain. And

19 I've asked you but I want to be clear, we forward –

20 you'll have to go back to that page now. "We

21 forwarded the original email to the current

22 leadership team."

23 At this time, June 12, 2018, were you part

24 of the current leadership team?

25 A. Yes, I was.

19

1 Q. So you would have seen this?

2 A. Yes.

3 Q. Because it was forwarded?

4 A. Yes.

5 Q. Okay. And then when we move up to the

6 next email, are you now part of this email chain, or

7 it's at least being forwarded to you?

8 A. Yes, I am.

9 Q. Okay. Now, go to the next page. I see

10 your – now I see your name responding to Laurynn.

11 Is that fair?

12 A. That is fair.

13 Q. Okay. So when we look at this, "I was

14 under the impression that the InterVarsity Graduate

15 Christian Fellowship's constitution had been updated

16 with the human rights clause and submitted to

17 OrgSync."

18 What did you understand OrgSync to be?

19 A. OrgSync I understood to be the web-based

20 service that the university uses to track and list

21 and generally communicate files and such with

22 registered Student Organizations of the university.

23 Q. Okay. And as a Registered Student

24 Organization through the University of Iowa,

25 InterVarsity receives certain benefits; correct?

20

1 A. That is correct.

2 Q. Okay. For example, you can use its email

3 system to do mass emails?

4 A. Yes.

5 Q. You understand that that system is being

6 provided by the University of Iowa?

7 A. Yes, I do.

8 Q. Okay. And InterVarsity can actually

9 access the Iowa Memorial Union for their recruitment

10 fairs free of charge?

11 A. Yes.

12 Q. Okay. Are there other benefits that the

13 university – excuse me, InterVarsity would be

14 eligible for that they choose not to use?

15 A. Not to my knowledge.

16 Q. Okay. For example, could you use

17 university property to hold your meetings as opposed

18 to the private church?

19 A. Yes, they could.

20 Q. Okay. And can you use those facilities

21 without paying rent?

22 A. I'm uncertain but I believe so.

23 Q. Okay. Are you aware that other private

24 groups that aren't registered with the University of

25 Iowa would have to pay to rent the Union?

21

1 A. Yes, I am aware.

2 Q. Do you agree that those are University of

3 Iowa funded benefits that are being provided to

4 InterVarsity?

5 A. Yes.

6 Q. Regardless of the source of the funding,

7 it is coming through the University of Iowa;

8 correct?

9 A. Yes.

10 Q. I mean, indirectly, some of it's coming

11 from your tuition.

12 A. Yes.

13 Q. So when we look at what I see to be your

14 email to Laurynn, you indicate that it was your

15 impression that the updated human rights clause had

16 been loaded into OrgSync; correct?

17 A. Yes.

18 Q. Okay. And the human rights clause is the

19 University of Iowa's clause that says, in essence,

20 no discrimination?

21 A. Yes.

22 Q. Okay. Did you, with this email where it's

23 under your – I was under the impression, did you

24 load it into OrgSync?

25 A. I did not.

22

1 Q. Okay. So then when we move up an email,
 2 June 12, 2018, this is from Andy Kutcher – I mean,
 3 with the assumption Andy is Andy Kutcher?
 4 A. Yes.
 5 Q. Okay. And in this time period, June 12th,
 6 you're on campus?
 7 A. Yes, I am.
 8 Q. You're certainly in Iowa City?
 9 A. Yes.
 10 Q. Okay. And is your group only for graduate
 11 students?
 12 A. No.
 13 Q. Okay. Do you have any leaders as of this
 14 time period that were undergrad?
 15 A. No.
 16 Q. Okay. Has it been your experience – how
 17 long have you been at Iowa?
 18 A. I'm in my third year.
 19 Q. Has it been your experience that grad
 20 students stay on campus for the summer months?
 21 A. Some do.
 22 Q. Okay. But you certainly did?
 23 A. Yes.
 24 Q. Okay. So now Andy's asking you did you
 25 use OrgSync; correct?

23

1 A. Yes.
 2 Q. Okay. Andy's saying I'm not seeing your
 3 submission. Do you see that?
 4 A. Yes.
 5 Q. Okay. Do you – do you agree that that's
 6 a fair question by him that he's not finding that?
 7 A. Yes.
 8 Q. Okay. You don't take any offense to this
 9 saying I'm just not finding it, do you?
 10 A. No.
 11 Q. Okay. And then moving up, this is from –
 12 this is to Andy from you; correct?
 13 A. Yes.
 14 Q. Okay. "I've now used the form you linked
 15 to submit the updated constitution." Correct?
 16 A. Yes.
 17 Q. Now – so going down again, are you now
 18 using this full website?
 19 A. Yes.
 20 Q. To submit the – the updated constitution?
 21 A. Yes.
 22 Q. Okay. So at this point you believe the
 23 University of Iowa has what it needs, the words
 24 "updated constitution"; correct?
 25 A. Yes.

24

1 Q. Okay. Did – now I'm going to the next
 2 page.
 3 By Andy's email to you it appears it's
 4 clear that it did go through the system and he's
 5 looked at it; correct?
 6 A. That is correct.
 7 Q. Okay. And we're still on the same day.
 8 A. Yes.
 9 Q. Okay. And if we look at – it's
 10 difficult, but if we look at the page before, this
 11 all appears to be occurring in the morning of June
 12 12th. Do you see that?
 13 A. Yes.
 14 Q. Okay. So now we're at an email, the one I
 15 was talking about from Andy to you, June 12, 2018,
 16 at 10:43 a.m. Correct?
 17 A. Yes.
 18 Q. Would you agree with me that Mr. Kutcher
 19 is being timely in getting back to you?
 20 A. Yes.
 21 Q. Okay. And Mr. Kutcher indicates he sees
 22 several issues; correct?
 23 A. Correct.
 24 Q. Okay. "I'm seeing potential contradictory
 25 language in Articles 2, 3, 4, and 7." Correct?

25

1 A. Correct.
 2 Q. Did you – at this point in time, how
 3 familiar were you with the InterVarsity's
 4 constitution?
 5 A. I was not very familiar with it.
 6 Q. How big of a document is it?
 7 A. I can't list the exact number of pages off
 8 of my head but it's not terribly long.
 9 Q. Okay. Is that a national constitution
 10 that's submitted to the group to get approval by
 11 campuses across the United States?
 12 A. I do not know.
 13 Q. Okay. You understand InterVarsity is a
 14 national group?
 15 A. Yes, I do.
 16 Q. Okay. Do you know approximately how many
 17 campuses it has functions or functions as a group?
 18 A. I do not know but I am aware that it's
 19 quite a few.
 20 Q. Right. It's a relatively large group, is
 21 it not?
 22 A. To my knowledge, yes.
 23 Q. Okay. So now at this point, at 10:43, Mr.
 24 Kutcher is identifying – at this stage I see
 25 several issues; correct?

26

1 A. Correct.

2 Q. Okay. Do you have any difficulty with him

3 identifying what he sees as several issues?

4 A. No, I do not.

5 Q. Did you understand his role at the time

6 was to review Student Organization constitutions?

7 A. Yes.

8 Q. Okay. So he was doing his job in that

9 sense, was he not?

10 A. Yes.

11 Q. Okay. So now when we go up – we'll have

12 to go to the page to get to the right email chain.

13 Now we're at same date, June 12, 2018, 11:02;

14 correct?

15 A. Yes.

16 Q. This is you getting back to Andy, correct?

17 A. Correct.

18 Q. So when we look at that, "I would guess

19 that the issues you see involve potential

20 contradictions to the part of the human rights

21 clause that states" – and then evoke some of the

22 policy. Then, see the paragraph that says, "While I

23 understand"?

24 A. Yes.

25 Q. And you're writing this; correct?

27

1 A. Correct.

2 Q. And when I say are you writing this, you

3 are writing this or you're just forwarding what

4 somebody else wrote?

5 A. I am writing this.

6 Q. Okay. And you write, "While I understand

7 that this leadership restriction can be construed as

8 a difference in treatment, it is also important to

9 have Christian leadership in a Christian

10 organization."

11 At some point in time were you told that

12 the University of Iowa would not allow InterVarsity

13 to select leaders based on religious beliefs?

14 A. Could you restate the question, please?

15 Q. Yes. At some point in time, and all of

16 this unfolded rather quickly, would you agree to

17 that?

18 A. I would agree.

19 Q. Okay. At some point in time were you

20 aware that the University of Iowa said to be in

21 compliance with the human rights policy you can't

22 have leadership restrictions?

23 A. Yes, I was aware that we could not have

24 leadership restrictions.

25 Q. And were you aware that the University of

28

1 Iowa was saying to comply with the human rights

2 policy you can't in any manner have leadership

3 restrictions?

4 A. Yes, I was aware.

5 Q. Now, during this time period, and not

6 pending the lawsuit now, did you read the human

7 rights policy in detail?

8 A. Yes, I did.

9 Q. Okay. And you understand that the

10 University of Iowa's human rights policy says you

11 cannot treat people differently based on certain

12 criteria?

13 A. Yes.

14 Q. Okay. And so one of the criteria is race;

15 correct?

16 A. Correct.

17 Q. Disability?

18 A. Correct.

19 Q. Age?

20 A. Correct.

21 Q. Okay. Religion?

22 A. Correct.

23 Q. Creed?

24 A. Correct.

25 Q. How can a nonbeliever – do you understand

29

1 what I mean by that, of Christian faith?

2 A. Yes, I do.

3 Q. Okay. How could a nonbeliever be a leader

4 for InterVarsity?

5 A. It would go against – if they don't

6 believe in what our group is about, what we – what

7 we talk about, what we believe, then it's very hard

8 for them to fulfill the purpose of the group.

9 Q. Okay. How are your leaders selected?

10 A. The former leadership team chose people

11 that they saw in the group who they thought would

12 serve as good leaders.

13 Q. Okay. And some of the criteria for good

14 leader would be like you show up to every meeting;

15 correct?

16 A. Correct. Attendance.

17 Q. You show leadership skills other than

18 religious leadership skills. You're an effective

19 speaker?

20 A. I would guess that could play a part.

21 Q. Okay. So under the – a nonbeliever

22 wouldn't be selected or couldn't be selected?

23 MR. BLOMBERG: Just to clarify, are you

24 asking about the InterVarsity's leadership policies?

25 MR. CARROLL: Yes.

30

1 MR. BLOMBERG: So under InterVarsity's
 2 leadership policies?
 3 MR. CARROLL: Yes.
 4 MR. BLOMBERG: Okay.
 5 THE WITNESS: Under InterVarsity's
 6 leadership policies, it is my understanding that the
 7 former leadership team, if they weren't aware of the
 8 person's being a nonbeliever might go forward with
 9 discussing the potential of leadership with them.
 10 BY MR. CARROLL:
 11 Q. Would you — you're the current president,
 12 correct?
 13 A. Correct.
 14 Q. You would be — at some point you may step
 15 down. Would you be involved in your successor's
 16 selection?
 17 A. Yes.
 18 Q. Okay. Would you select a nonbeliever to
 19 be the president of InterVarsity?
 20 A. I would not because it goes against the
 21 purpose of our group.
 22 Q. Would you select an African-American to be
 23 a leader?
 24 A. Yes, if they — if they're — if they
 25 follow the purpose of the group.

31

1 Q. Okay. Do you believe that other
 2 Registered Student Organizations on campus could
 3 have similar restrictions to their leaders, that
 4 they have to believe in the core mission of the
 5 group?
 6 MR. BLOMBERG: Objection; calls for legal
 7 conclusion, speculation.
 8 You may answer if you can.
 9 THE WITNESS: It is my opinion that they
 10 should be allowed to.
 11 BY MR. CARROLL:
 12 Q. Okay. So, for example, on campus there's
 13 a Women in Color group, and it includes all women of
 14 color. Do you believe they have the right to select
 15 the leadership to be limited to only women of color?
 16 MR. BLOMBERG: Objection; calls for legal
 17 conclusion.
 18 You may answer if you can.
 19 THE WITNESS: Yes, I believe they should
 20 have that right because of the purpose of their
 21 group.
 22 BY MR. CARROLL:
 23 Q. Okay. So it's the purpose of the group
 24 that in your mind dictates selection of leaders?
 25 A. Yes.

32

1 Q. And what if the purpose of the group
 2 violates the human rights clause?
 3 MR. BLOMBERG: Objection; calls for legal
 4 conclusion about what violates human rights clause.
 5 You may answer if you can.
 6 THE WITNESS: If a group violates the
 7 human rights clause then I would see an issue with
 8 that.
 9 BY MR. CARROLL:
 10 Q. Okay. So, for example, could a white man
 11 be a leader in Women of Color?
 12 MR. BLOMBERG: Objection; calls for
 13 speculation and legal conclusion.
 14 You can answer if you can.
 15 THE WITNESS: I suppose so but to me that
 16 does not make sense.
 17 BY MR. CARROLL:
 18 Q. And why doesn't it make sense?
 19 A. As I stated before, the purpose of their
 20 group is — I'm not familiar with the exact purpose
 21 but from my understanding it's a group that provides
 22 resources and support for women of color. A white
 23 male would not necessarily have the background
 24 experience to be able to effectively provide that
 25 support, those resources.

33

1 Q. Okay. And is there a — are you — on
 2 campus, are you involved in any of the Women in
 3 Science RCOs?
 4 A. I am not.
 5 Q. RSOs, excuse me.
 6 A. I am not.
 7 Q. Okay. Are you aware that they are, they
 8 exist?
 9 A. Yes, I am.
 10 Q. Are you aware that there's a Women in
 11 Engineering?
 12 A. Yes, I am.
 13 Q. Based on what you testified to earlier, do
 14 you believe that Women in Engineering could exclude
 15 male engineering students as leaders?
 16 MR. BLOMBERG: Objection; calls for legal
 17 conclusion and speculation.
 18 You may answer if you can.
 19 THE WITNESS: As I stated before, because
 20 the purpose of the group is for women in
 21 engineering, the ideal would be to have leaders who
 22 have a background that allows them to support the
 23 purpose of the group, which a male engineer may not
 24 have.
 25 BY MR. CARROLL:

34

1 Q. Okay. And so if we go up on this page,
 2 excuse me, June 12, 11:19, do you see that?
 3 A. Yes. Yes, I do.
 4 Q. Okay. So now this is more -- well, from
 5 is generic but it's obviously signed off on by Andy
 6 to you; correct?
 7 A. That is correct.
 8 Q. And if you want to take a moment to look
 9 at it.
 10 A. All right. I read it.
 11 Q. Okay. And is it fair to say that the
 12 University of Iowa is telling your group,
 13 InterVarsity -- I'll call it InterVarsity -- that
 14 your leadership requirements are contrary to the
 15 University of Iowa human rights policy?
 16 A. That is fair.
 17 Q. Okay. Do you have a -- if you do, that's
 18 fine, if you don't, that's fine. Do you have an
 19 opinion on whether the University of Iowa can
 20 enforce its policies and regulations?
 21 MR. BLOMBERG: Objection; calls for legal
 22 conclusion.
 23 You may answer if you can.
 24 THE WITNESS: Could you restate the
 25 question, please?

35

1 BY MR. CARROLL:
 2 Q. Yes. You're a student at the University
 3 of Iowa; correct?
 4 A. Yes.
 5 Q. For example, you're subject to many rules
 6 and regulations as a student; correct?
 7 A. Correct.
 8 Q. Okay. Is it fair for the University of
 9 Iowa to have those rules and regulations that govern
 10 you as a student?
 11 A. Yes.
 12 Q. Okay. And those rules and regulations are
 13 quite broad, are they not?
 14 A. They are.
 15 Q. Okay. For example, your stipend, there
 16 are certain restrictions on how you can use the
 17 funds and what you're supposed to do if you use the
 18 funds; correct?
 19 A. Not to my knowledge.
 20 Q. Well, you're a teaching assistant for an
 21 academic year?
 22 A. No, I'm a research assistant.
 23 Q. Research assistant. But if you take the
 24 stipend, it's fair for the university to expect you
 25 to be at work?

36

1 A. Yes.
 2 Q. And do research?
 3 A. Yes.
 4 Q. Okay. So do you view the University of
 5 Iowa's human rights policy to be any different than
 6 another policy that the University of Iowa enforces
 7 because you're a University of Iowa student?
 8 MR. BLOMBERG: Objection; calls for legal
 9 conclusion. You can answer if you can.
 10 THE WITNESS: No, I do not.
 11 BY MR. CARROLL:
 12 Q. So if we could go to the next page,
 13 please.
 14 And so now at the bottom, this is from
 15 you, same day, really -- would you agree, all of
 16 this is occurring pretty quickly. You're being
 17 responsive. Mr. Kutcher is being responsive;
 18 correct?
 19 A. Yes.
 20 Q. Okay. So, I mean, you're a University of
 21 Iowa student. You understand sometimes you won't
 22 hear back from a professor for a day or two; right?
 23 A. Yes.
 24 Q. Okay. Unfortunately, it's common. Mr.
 25 Kutcher is being extremely timely; is that fair?

37

1 A. That is fair.
 2 Q. So now at 11:25, you're emailing, "Thank
 3 you for the clarification." And then, "I will need
 4 to discuss any changes with the rest of the
 5 leadership team."
 6 Who would the leadership team be? And I
 7 don't need the names necessarily, but is it -- how
 8 many leaders do you have?
 9 A. We currently have four leaders including
 10 myself.
 11 Q. Okay. And are those actual positions,
 12 like you're the president, so is there a vice
 13 president?
 14 A. There is not.
 15 Q. Okay. So what -- president, and then what
 16 would be my leader -- if I put my name and said I
 17 was a leader, what would I be?
 18 A. We have roles of president and treasurer
 19 as required by the university. For the rest of the
 20 leadership team we just refer to them as leadership
 21 team in general and we -- roles can change from year
 22 to year.
 23 Q. Okay. So there's no vice president, per
 24 se?
 25 A. No.

38

1 Q. Okay. Is there a de facto vice president?

2 A. Not to my knowledge.

3 Q. So, for example, what if you were

4 unavailable for a month? Who would step in for your

5 role as a leader, president?

6 A. We would talk with the leadership team

7 about this and either one or multiple of them would

8 step into parts of my role.

9 Q. Okay. Then when we look at your email at

10 11:25, you're suggesting that – what I'll say, a

11 possible compromise. Is that fair?

12 A. That is fair.

13 Q. Okay. So, and you're suggesting

14 potentially language, "Are strongly encouraged to

15 subscribe. Make it so that the constitution is no

16 longer contradictory."

17 Do you see that?

18 A. Yes, I see that.

19 Q. But then it appears that you needed to

20 talk to your leaders about that potential change;

21 correct?

22 A. Correct.

23 Q. Did you have that conversation?

24 A. We did not.

25 Q. Okay. And why not?

39

1 A. We did not have that conversation because

2 I was awaiting a response regarding that change,

3 whether that would be satisfactory. I did not see a

4 point in having the conversation if it wouldn't be

5 accepted anyway.

6 Q. Okay. So then when we go up to the top of

7 this page, and you have to go to the next page. I

8 think this is what puts it in context. So now we're

9 at Tuesday, June 12th, at 4:05. Do you see that?

10 A. Yes, I do.

11 Q. And then for that page, would you agree

12 with me that this email is connected to that date

13 and time?

14 A. Yes.

15 Q. So this is from Andy; correct?

16 A. Correct.

17 Q. And in essence, what is Andy telling you?

18 A. In essence he is telling me that the

19 proposed change that I was saying if it was accepted

20 I would discuss with my leadership team, would not

21 be approved.

22 Q. Okay. So at this point in time, 4:05 on

23 June 12th, did you have the full understanding that

24 the University of Iowa would not agree to your

25 proposed change?

40

1 A. Yes, I did.

2 Q. And did you understand that the University

3 of Iowa viewed even the proposed change to still

4 violate the human rights policy?

5 A. Yes.

6 Q. Okay. What, if anything, did you do next?

7 A. I spoke with InterVarsity leaders about

8 the matter.

9 Q. Okay. And then if you would go to the –

10 and what did they say, if anything, to you, the

11 leaders?

12 A. It was at this point that we went beyond

13 just talking to the university. I was not as

14 involved with this portion.

15 Q. Okay. And what – I'm sorry. What did

16 you mean by "went beyond talking to the university"?

17 A. I spoke with the faculty member of another

18 InterVarsity group as Mr. Kummer was not able to be

19 part of this conversation, so we spoke about what we

20 could do since the university was not approving the

21 possible language changes.

22 Q. Okay. Who was the faculty member?

23 A. The faculty member was Wade Summers.

24 Q. Is that a faculty member on campus?

25 A. He was InterVarsity staff.

41

1 Q. Okay. So when I hear the word "faculty" I

2 view as professors.

3 A. My apology.

4 Q. Okay. Okay. So – so he's an

5 InterVarsity staff. Where is he located, if you

6 know?

7 A. I don't know.

8 Q. Okay. Do you know it's not in Iowa City?

9 Or you don't even know that?

10 A. I believe he's in Iowa City.

11 Q. Okay. All right. So then the top page,

12 the June 13th, 4:02, you see it's 4:02 a.m.?

13 A. Yes.

14 Q. Okay. So now Andy is writing to you;

15 correct?

16 A. Correct.

17 Q. Okay. And he's indicating that – you

18 already understand that Iowa is not going to accept

19 your proposed change; correct?

20 A. Correct.

21 Q. Did you have the understanding at this

22 point in time the University of Iowa expected the

23 leadership selection process to comply with the

24 human rights policy?

25 A. Yes.

42

1 Q. Okay. Did InterVarsity submit, after this
 2 email, June 13, 2018, at 4:02 a.m., did InterVarsity
 3 submit a constitution to the University of Iowa that
 4 complied with what Mr. Kutcher and Laurynn had been
 5 relaying to you or other leaders?
 6 A. Not after that email.
 7 Q. Okay. And then after that email, after
 8 this time, at some point InterVarsity was
 9 deregistered; correct?
 10 A. Correct.
 11 Q. Were you -- were you directly informed of
 12 that?
 13 A. Not to my memory.
 14 Q. Okay. How did you learn of it?
 15 A. As I recall, it was a university press
 16 release, I believe. Or a press release related to
 17 the university. I don't recall the specifics.
 18 Q. Okay. At this point in time you were
 19 dealing with Andy or Laurynn; correct?
 20 A. Correct.
 21 Q. And is it your recollection that they
 22 didn't -- the Student Organization didn't inform
 23 InterVarsity that it was going to be deregistered?
 24 A. I do not recall any further emails past
 25 this.

43

1 Q. Okay. Now, these emails, if you would
 2 look at -- did we mark Exhibit E? I don't think we
 3 did.
 4 THE REPORTER: I don't think you did.
 5 MR. CARROLL: Okay. So if you would mark
 6 this, please.
 7 THE REPORTER: You did have the complaint
 8 as --
 9 MR. CARROLL: Oh, yeah. We need an
 10 Exhibit 4. Sorry.
 11 THE REPORTER: Exh bit 4 is marked.
 12 (WHEREUPON, Exhibit 4 was marked for
 13 identification.)
 14 THE WITNESS: Thank you.
 15 BY MR. CARROLL:
 16 Q. These are grouped just the way they've
 17 come. The emails overlap. But if you can just look
 18 to the first full page of the email.
 19 MR. BLOMBERG: George, just to make sure
 20 we're on the same page as far as exh bits. So
 21 Exhibits 1 and 2 were both exhibits to Mr. Kummer's
 22 deposition.
 23 MR. CARROLL: Yes.
 24 MR. BLOMBERG: And they were marked then.
 25 MR. CARROLL: Yes.

44

1 MR. BLOMBERG: And we used that. And this
 2 one is the first one that we've marked for this
 3 deposition?
 4 MR. CARROLL: Yes.
 5 MR. BLOMBERG: We're starting at Exh bit
 6 4?
 7 MR. CARROLL: Yeah.
 8 MR. BLOMBERG: Okay. Great.
 9 BY MR. CARROLL:
 10 Q. And I just want to direct your attention
 11 to -- do you see the top email?
 12 A. Yes.
 13 Q. And it's June 12th, 1:07 p.m.?
 14 A. Yes.
 15 Q. Okay. And that's from Andy?
 16 A. Yes.
 17 Q. So we've kind of gone back in time but
 18 these are how these have been grouped. But is it
 19 fair to say that Andy is saying to you at this point
 20 in time, "I would say go ahead and discuss with the
 21 rest of your group"?
 22 A. Yes.
 23 Q. Okay. And that conversation did not
 24 occur?
 25 A. Correct.

45

1 Q. Okay. Then other than talking to your
 2 attorneys or potential attorneys, once you somehow
 3 became aware that InterVarsity was deregistered, who
 4 did you talk to?
 5 A. Most any conversation about this was
 6 limited to InterVarsity, specifically Mr. Kummer and
 7 our leadership team.
 8 Q. Okay. So once you were aware that
 9 InterVarsity was deregistered, did you take any
 10 steps to get reregistered?
 11 A. I personally did not take any steps.
 12 Q. Are you aware if anybody did other than
 13 attorneys?
 14 A. I am not aware.
 15 Q. Okay. Are you aware that InterVarsity was
 16 reregistered?
 17 A. Yes, I am aware.
 18 Q. And what was the time gap, if you know,
 19 between deregistration and reregistration?
 20 A. I'm not certain of the exact time gap but
 21 I do believe it was a couple months.
 22 Q. Okay. The -- so with the assumption
 23 you're deregistered in the summer of 2018 --
 24 A. Yes.
 25 Q. -- was InterVarsity to participate in the

46

1 fall recruitment fair at the Union?
 2 A. Yes.
 3 Q. Okay. And isn't it – that fair occurs
 4 generally in September of the fall semester? Maybe
 5 late August?
 6 A. I believe it was late August.
 7 Q. Okay. But it's pretty much when school
 8 started; is that fair?
 9 A. That is fair.
 10 Q. Okay. And was InterVarsity a Registered
 11 Student Organization to participate in the
 12 recruitment fair?
 13 A. We –
 14 MR. BLOMBERG: Objection. I'm not sure
 15 that we – that it was university's position that
 16 they were registered or being treated as registered,
 17 but just, you can answer if you can.
 18 THE WITNESS: To my knowledge, we were
 19 allowed to. I do not know if we were considered as
 20 a Registered Student Organization, but we were
 21 permitted to participate.
 22 BY MR. CARROLL:
 23 Q. Okay. And that was the same benefit you
 24 had, InterVarsity had as a registered group;
 25 correct?

47

1 A. Yes.
 2 Q. Did you pay rent?
 3 A. No, we did not.
 4 Q. Were you allowed to put up a table?
 5 A. Yes, we were.
 6 Q. And you were allowed to recruit students?
 7 A. Yes, we were.
 8 Q. And were you allowed to represent on that
 9 table that you had, like any other group, were you
 10 allowed to indicate that you were a viable student
 11 organization on campus?
 12 A. I'm not sure what you mean by "viable
 13 student organization."
 14 Q. Well, there's been some testimony in this
 15 record that you were listed as defunct and that it
 16 impacted membership and other things. But at the –
 17 if you're deregistered in June and you're allowed to
 18 participate in the recruitment fair in late August
 19 of the same year, correct, 2018?
 20 A. Correct.
 21 Q. Okay. At that fair, were you allowed to
 22 indicate that we are viable in the sense of we are a
 23 student group and we are on campus, just like the
 24 table next to you, and here's what we offer?
 25 A. Yes.

48

1 Q. Okay. And the University of Iowa didn't
 2 interfere with that in any manner, did they?
 3 A. They did not.
 4 Q. Okay. Did they provide you the same
 5 benefits that you had in others, what I call the
 6 fall and winter fairs?
 7 A. Yes.
 8 Q. Okay. So the winter fair is generally
 9 when school starts again in January?
 10 A. Yes.
 11 Q. Okay. So in January of 2018, you were –
 12 InterVarsity was a Registered Student Organization?
 13 A. In January of 2018? Yes.
 14 Q. Yes. And you participated in that, what I
 15 call the winter fair; correct?
 16 A. I was not on leadership at that point so I
 17 don't know.
 18 Q. Okay. You don't know if InterVarsity even
 19 appeared at the fair?
 20 A. I have no knowledge –
 21 Q. Okay.
 22 A. -- about InterVarsity's presence at that
 23 fair.
 24 Q. Okay. And did you participate in the
 25 August fair?

49

1 A. Of which year?
 2 Q. 2018?
 3 A. Yes.
 4 Q. Okay. Were you physically at the Union?
 5 A. Yes, I was.
 6 Q. And did you physically recruit students?
 7 A. Yes, we did.
 8 Q. Okay. How was that recruiting fall?
 9 A. We had a few students come up to us and
 10 express interest but not many of them ended up
 11 joining the group.
 12 Q. What's your current membership? And what
 13 I mean by that, numbers?
 14 A. To my knowledge our current membership is
 15 about 20 members.
 16 Q. And how many did you have in the fall of
 17 2018?
 18 A. It would be about the same for fall of
 19 2018.
 20 Q. Okay. And how about, if you know, when
 21 you first became involved in InterVarsity, what was
 22 the current membership?
 23 A. I don't know numbers of membership at that
 24 point. But I did notice that the monthly meetings
 25 were larger at that point than they are currently.

50

1 Q. Okay. And in January 2018, the university
 2 had taken no action against InterVarsity, is that
 3 fair?
 4 A. That is fair.
 5 Q. Okay. So do you attribute the lowering of
 6 membership to the University of Iowa or maybe a
 7 general lack of student interest?
 8 A. I don't have the experience to speak to
 9 that.
 10 Q. Okay. The -- have you had any students --
 11 first of all I'll limit it to students. Have you
 12 had any students talk to you about the InterVarsity
 13 lawsuit?
 14 A. Yes.
 15 Q. And who? I don't need names. How many
 16 students?
 17 A. There was one student specifically at a
 18 recruitment fair --
 19 Q. Okay.
 20 A. -- who inquired.
 21 Q. They inquired about the lawsuit?
 22 A. They inquired about what was going on with
 23 our situation. Were we allowed to be there? That
 24 kind of vein of questioning.
 25 Q. And clearly you were there.

51

1 A. Yes.
 2 Q. So you were allowed to be there.
 3 A. Yes. More of a confirmation that they
 4 were allowing us to be there.
 5 Q. And as we speak today, you are officially
 6 registered, you are allowed to function as a RSO on
 7 University of Iowa campus, InterVarsity, correct?
 8 A. To my knowledge, yes.
 9 Q. Okay. And has there been any -- the email
 10 account still exists for your access?
 11 A. Could you specific which email account
 12 you're referring to?
 13 Q. Yes. The one that University of Iowa
 14 provides to have mass mailings?
 15 A. Yes.
 16 Q. Okay. And if you wanted to, InterVarsity
 17 could utilize space on campus, conference rooms?
 18 A. To my knowledge, yes.
 19 Q. Do you know who you would talk to, for
 20 example, if you wanted to hold, as opposed to the
 21 private church you described, if you wanted to have
 22 it on campus so maybe it was more convenient for
 23 students who don't have cars, for example, who would
 24 you talk to to see about a room at the Union or, you
 25 know, there's a lot -- well, maybe you don't know

52

1 this, there's a lot of conference rooms in the
 2 Business School. Who would you talk to to try to
 3 get that permission?
 4 A. I'm not absolutely certain but I do
 5 believe it would be someone in the Student
 6 Organization/Student Life office.
 7 Q. And you could send that email, like some
 8 of these emails are just coming from Student
 9 Organization Help and Information.
 10 A. Yes.
 11 Q. You could say, hey, we'd like to have a
 12 meeting Thursday evening. What conference rooms are
 13 available? And we have approximately how many
 14 people, you know, because that dictates the size of
 15 the conference room. You could get to somebody at
 16 Iowa that could answer the question; is that fair?
 17 A. That is fair.
 18 Q. Okay. And has InterVarsity ever utilized
 19 conference space other than the recruitment fairs?
 20 A. Yes.
 21 Q. In what buildings, if you recall?
 22 A. I can see the building. I believe it was
 23 one of the medical buildings but I can't recall the
 24 exact name of it at this point.
 25 Q. And there was a conference room made

53

1 available?
 2 A. Yes.
 3 Q. Okay. And then have you ever used any
 4 other buildings on campus?
 5 A. I'm not aware of any other buildings.
 6 Q. To your knowledge?
 7 A. Yes.
 8 Q. Okay. Is there anything that would
 9 prevent your group from asking for that?
 10 A. Not as far as I know.
 11 Q. So is it fair to say that you choose to
 12 have your meetings at the private church for your
 13 own convenience? I'm sure parking is much better
 14 than on campus.
 15 A. Yes.
 16 Q. Is that why you choose that site?
 17 A. It is fair to say that we choose that
 18 site.
 19 Q. Okay. All right.
 20 MR. CARROLL: I'm going to take a short
 21 break.
 22 THE REPORTER: We're off the record.
 23 (WHEREUPON, a brief recess was taken.)
 24 THE REPORTER: We're on the record.
 25 BY MR. CARROLL:

54

1 Q. All right. Just a brief follow up. You
 2 indicated you maybe had conversations or contact
 3 with Wade Summers?
 4 A. Yes.
 5 Q. Okay. And other than potentially
 6 announced to your attorneys, do you know if you
 7 emailed any others about the issues surrounding this
 8 litigation?
 9 A. To my knowledge I did not.
 10 Q. Okay. Did you email Mr. Summers?
 11 A. I did contact him. I do not remember who
 12 initiated our contact.
 13 Q. Okay. And if you had any emails between
 14 your leadership, membership, Mr. Summers, Mr.
 15 Kummer, have you provided those to your attorneys?
 16 A. Yes.
 17 MR. CARROLL: Thank you. I have on
 18 further questions.
 19 MR. BLOMBERG: Just a couple questions on
 20 redirect.
 21 EXAMINATION
 22 BY MR. BLOMBERG:
 23 Q. You were talking earlier about how the
 24 monthly meetings were larger before the
 25 derecognition that Mr. Carroll asked you about,

55

1 whether you attribute that to the diminution and
 2 attendance to deregistration, and I think you don't
 3 have enough experience in that. Were you saying
 4 that as I ke an empirical matter you couldn't, you
 5 know, prove one way or another on that issue?
 6 A. There's not much that you can prove with
 7 two data points.
 8 Q. Okay. And then, but speaking personally,
 9 what has been your personal experience? I mean, if
 10 you had known that you were signing up to have to go
 11 through this, would you have agreed to be a leader?
 12 A. I would not.
 13 Q. Why not?
 14 MR. CARROLL: I'm going to object as
 15 irrelevant. This is not an emotional distress case.
 16 MR. BLOMBERG: Okay. Are you going to
 17 enter your objection?
 18 MR. CARROLL: Mm-hmm.
 19 THE WITNESS: I would not have agreed to
 20 be a leader because of the -- just being -- I would
 21 not have agreed to be a leader because being
 22 associated with something like this can have
 23 negative impacts on my career, my time at the
 24 university, et cetera. So I would not have chosen
 25 to be so closely associated with this group.

56

1 BY MR. BLOMBERG:
 2 Q. Does that impact your ability to -- the
 3 way you think about trying to find leaders now?
 4 A. It does.
 5 Q. And how does it do that?
 6 A. I don't have the same kind of leadership
 7 experience as the typical InterVarsity leader would
 8 because I've had to go through this process. So
 9 when speaking to potential future leaders, I will
 10 not be able to give them a proper idea of what it
 11 would be like in a year that we don't have a
 12 situation like this. I don't really have a good way
 13 to -- a good basis to give them an idea of what to
 14 expect as a leader. And I'm also hesitant to ask
 15 people because I don't want to put people in the
 16 same situation that I'm in.
 17 Q. Do you need a tissue or anything?
 18 A. Yes, I do.
 19 Q. Just let me know when you're ready. No
 20 rush.
 21 A. I'm good.
 22 Q. You talked about how it impacts
 23 leadership. Can you ta k about how it impacts
 24 membership? If you had known about this going in,
 25 would you have wanted to be a member of InterVarsity

57

1 Graduate?
 2 A. I think I would have been very skeptical
 3 of being a member of InterVarsity Graduate,
 4 especially knowing that they were deregistered at
 5 one point. At that point, like in that situation, I
 6 would not have known the details so I would have
 7 been very skeptical to join a group that was
 8 deregistered by the university.
 9 Q. Did you -- the process of trying to
 10 maintain your registration and work with the
 11 university to stay on campus, did that impact -- did
 12 it require you to spend a lot of time or effort?
 13 A. Particularly in the dates indicated by
 14 these emails I did have to spend significant time as
 15 shown emailing, reading through, for instance, the
 16 human rights clause, the InterVarsity constitution,
 17 and similar documents.
 18 Q. Did the time that you spent on trying to
 19 be -- remain registered and become reregistered take
 20 away from your ability to prepare for ministry in
 21 the coming year with InterVarsity Graduate?
 22 A. It was a distraction, and it also took up
 23 our time at our leadership meetings. We did take up
 24 time to discuss this instead of other plans for the
 25 coming year.

58

1 Q. Did it affect the types of activities that
 2 you would have over the summer with the group?
 3 A. Usually, we would have at least one – or
 4 we would have a few events over the summer. We were
 5 only able to have one this past summer and I would
 6 say that is partially because we were preoccupied
 7 with dealing with this.
 8 Q. Do you, from your meetings with the other
 9 leaders, did it seem like it was stressful for them
 10 as well?
 11 A. I'm not certain.
 12 Q. The – talking about some of the benefits
 13 that Registered Student Organizations provides, what
 14 are some of the ones that are particularly important
 15 to InterVarsity?
 16 A. Particularly important to us I would say
 17 are the ability to recruit students at the
 18 recruitment fairs. So the ability to be present
 19 there. And, as well as the mass email, being able
 20 to communicate in that way. We need the recruitment
 21 fairs because it could be difficult to find new
 22 members otherwise as graduate students often aren't
 23 on campus except for, for instance, school and work
 24 and that's about it. There's not necessarily other
 25 ways we can find new members unless they already

59

1 know someone in the group.
 2 MR. BLOMBERG: Nothing further.
 3 FURTHER EXAMINATION
 4 BY MR. CARROLL:
 5 Q. Can an individual be openly gay and be a
 6 leader with InterVarsity?
 7 A. To my knowledge there is nothing in the
 8 constitution or the statement of faith that would
 9 prevent them from doing so.
 10 Q. Is the statement of faith for InterVarsity
 11 opposite sex marriage?
 12 A. I do not recall.
 13 Q. Are the tenets of InterVarsity for
 14 opposite sex marriage?
 15 A. I am not familiar with the exact tenets.
 16 MR. CARROLL: Okay. No further questions.
 17 MR. BLOMBERG: We will sign. Review and
 18 sign.
 19 (WHEREUPON, at 10:25 a.m., the deposition
 20 of KATRINA SCHROCK concluded.)
 21
 22
 23
 24
 25

60

1 CERTIFICATE
 2
 3 I, Ryan Batterson, do hereby certify that I reported
 4 all proceedings adduced in the foregoing matter and that
 5 the foregoing transcript pages constitutes a full, true,
 6 and accurate record of said proceedings to the best of
 7 my ability.
 8
 9 I further certify that I am neither related to
 10 counsel or any part to the proceedings nor have any
 11 interest in the outcome of the proceedings.
 12
 13 IN WITNESS HEREOF, I have hereunto set my hand this
 14 4th day of April, 2019.
 15
 16
 17
 18
 19
 20 /S/ Ryan Batterson
 21
 22
 23
 24
 25

61

1 Date: April 4, 2019 Assignment #: 29698-2
 2 Attorney: Daniel Blomberg, Esquire
 3 Deponent: Katrina Schrock
 4 Case: Intervarsity Christian vs. University of Iowa
 5
 6 ATTORNEY - TRANSCRIPT ENCLOSED: Signature of your
 7 client
 8 is required. Please have your client make any corrections
 9 necessary. Sign the Correction Sheet where indicated.
 10 Forward a COPY of the executed Correction Sheet directly
 11 to the attorney(s) listed below. (The Address(es) can be
 12 found on the Appearance page of the deposition.) Also,
 13 send a COPY of the executed Correction Sheet to our
 14 corporation.
 15
 16
 17
 18
 19
 20
 21 CC: Naegeli Deposition & Trial
 22 George Carroll, Esquire
 23
 24
 25

62

1 CORRECTION SHEET
2 Deposition of: Katrina Schrock Date: 03/28/19
3 Regarding: Intersivity Christian vs. U of Iowa
4 Reporter: Batterson/Morrison
5 _____
6 Please make all corrections, changes or clarifications
7 to your testimony on this sheet, showing page and line
8 number. If there are no changes, write "none" across
9 the page. Sign this sheet on the line provided.
10 Page Line Reason for Change
11 _____
12 _____
13 _____
14 _____
15 _____
16 _____
17 _____
18 _____
19 _____
20 _____
21 _____
22 _____
23 _____
24 Signature _____
25 Katrina Schrock

63

1 DECLARATION
2 Deposition of: Katrina Schrock Date: 03/28/19
3 Regarding: Intersivity Christian vs. U of Iowa
4 Reporter: Batterson/Morrison
5 _____
6
7 I declare under penalty of perjury the following to
8 be true:
9
10 I have read my deposition and the same is true and
11 accurate save and except for any corrections as made
12 by me on the Correction Page herein.
13
14 Signed at _____,
15 on the _____ day of _____, 2019.
16
17
18
19
20
21
22
23
24 Signature _____
25 Katrina Schrock

<p><u>1</u> 1 13:19 13:22 14:1 14:18 43:21 1:07 44:13 10:25 59:19 10:43 24:16 25:23 11:02 26:13 11:19 34:2 11:25 37:2 38:10 12 18:23 22:2 24:15 26:13 34:2 12th 22:5 24:12 39:9 39:23 44:13 13 42:2 13th 41:12 <hr/> 2 2 16:21 24:25 43:21 20 49:15 2017 10:2 10:10 2018 14:1 14:18 18:23 22:2 24:15 26:13 42:2 45:23 47:19 48:11 48:13 49:2 49:17 49:19 50:1</p>	<p>2019 6:4 28 6:4 <hr/> 3 3 24:25 <hr/> 4 4 24:25 43:10 43:11 43:12 44:6 4:02 41:12 41:12 42:2 4:05 39:9 39:22 <hr/> 7 7 24:25 <hr/> 9 9:18 6:5 <hr/> A a.m 6:5 24:16 41:12 42:2 59:19 ability 56:2 57:20 58:17 58:18 able 32:24 40:18 56:10 58:5 58:19 absolutely 52:4 academic 35:21 accept 41:18 accepted 39:5 39:19</p>	<p>access 20:9 51:10 account 14:12 14:15 14:24 15:1 15:10 15:14 15:17 51:10 51:11 accounts 18:14 across 25:11 action 16:17 16:19 50:2 activities 58:1 actual 37:11 actually 16:4 17:6 20:8 affect 58:1 African- American 30:22 against 29:5 30:20 50:2 Age 28:19 agreed 55:11 55:19 55:21 ahead 44:20 allow 7:8 27:12 allowed 31:10 46:19 47:4 47:6 47:8 47:10 47:17</p>	<p>47:21 50:23 51:2 51:6 allowing 51:4 allows 33:22 already 7:13 12:3 41:18 58:25 am 8:13 8:18 8:20 9:3 9:13 11:1 12:7 12:10 12:18 13:24 17:3 19:8 21:1 22:7 25:18 27:5 33:4 33:6 33:9 33:12 45:14 45:17 59:15 Andy 11:12 22:2 22:3 22:3 23:12 24:15 26:16 34:5 39:15 39:17 41:14 42:19 44:15 44:19 Andy's 22:24 23:2 24:3 announced 54:6 answer 8:5 14:23 31:8 31:18 32:5 32:14 33:18 34:23</p>
--	--	--	--

36:9	attend 8:25	27:13 28:11	36:8
46:17 52:16	10:8	33:13	43:19 43:24
anybody 45:12	attendance	basis 56:13	44:1 44:5
anything 7:10	29:16 55:2	became 45:3	44:8
15:20 15:22	attended 8:22	49:21	46:14 54:19
16:2 40:6	attendee	become 9:21	54:22 55:16
40:10	10:13	10:9 57:19	56:1 59:2
53:8 56:17	attention	begin 6:9	59:17
anyway 39:5	44:10	beginning	bottom
apology 41:3	attorneys	13:10	17:21 36:14
appeared	7:24 45:2	behalf 11:4	break 53:21
48:19	45:2	beliefs 27:13	brief 53:23
appears 18:17	45:13	believe 13:12	54:1
24:3	54:6 54:15	16:12 20:22	broad 35:13
24:11 38:19	attribute	23:22	building
approval	50:5 55:1	29:6 29:7	52:22
25:10	August 46:5	31:1 31:4	buildings
approved	46:6	31:14 31:19	52:21 52:23
39:21	47:18 48:25	33:14 41:10	53:4 53:5
approving	available	42:16 45:21	Business 52:2
40:20	52:13 53:1	46:6 52:5	
approximately	awaiting 39:2	52:22	C
25:16 52:13	aware 20:23	benefit 46:23	campus 9:12
aren't	21:1	benefits	12:5
20:24 58:22	25:18 27:20	19:25 20:12	12:16
Articles	27:23 27:25	21:3 48:5	22:6
24:25	28:4 30:7	58:12	22:20
aspects 11:6	33:7	better 53:13	31:2
assistant	33:10	beyond	31:12
35:20 35:22	45:3 45:8	40:12 40:16	33:2
35:23	45:12 45:14	BLOMBERG 6:24	40:24 47:11
associated	45:15 45:17	14:6	47:23
6:12	53:5	29:23	51:7
55:22 55:25	away 57:20	30:1 30:4	51:17 51:22
assumption		31:6	53:4
22:3 45:22	B	31:16	53:14 57:11
attempt 13:7	background	32:3	58:23
	32:23 33:22	32:12 33:16	campuses
	based 18:6	34:21	25:11 25:17
			career 55:23

Carroll 6:9 7:10 7:11 7:14 7:16 14:9 29:25 30:3 30:10 31:11 31:22 32:9 32:17 33:25 35:1 36:11 43:5 43:9 43:15 43:23 43:25 44:4 44:7 44:9 46:22 53:20 53:25 54:17 54:25 55:14 55:18 59:4 59:16	changes 37:4 40:21 chapter 9:14 11:2 11:5 charge 20:10 choose 20:14 53:11 53:16 53:17 chose 29:10 chosen 55:24 Christian 6:13 14:8 19:15 27:9 27:9 29:1 church 10:8 10:19 20:18 51:21 53:12 City 10:21 22:8 41:8 41:10 Civil 6:21 clarification 37:3 clarify 14:8 15:25 18:4 29:23 classes 12:22 clause 19:16 21:15 21:18 21:19 26:21 32:2 32:4 32:7 57:16 clear 18:19 24:4	clearly 50:25 closely 55:25 college 8:22 9:16 color 31:13 31:14 31:15 32:11 32:22 comfort 7:8 coming 15:9 21:7 21:10 52:8 57:21 57:25 common 36:24 communicate 11:15 19:21 58:20 communicated 11:12 communication 11:17 community 10:7 complaint 43:7 compliance 27:21 complied 42:4 comply 28:1 41:23 compromise 38:11 concluded 59:20 conclusion 31:7 31:17	32:4 32:13 33:17 34:22 36:9 condition 7:4 7:9 conference 51:17 52:1 52:12 52:15 52:19 52:25 confirmation 51:3 connected 39:12 considered 46:19 constitution 13:8 19:15 23:15 23:20 23:24 25:4 25:9 38:15 42:3 57:16 59:8 constitutions 26:6 construed 27:7 contact 15:18 16:8 54:2 54:11 54:12 context 39:8 contradiction s 26:20 contradictory 24:24 38:16 contrary 34:14
---	---	--	--

convenience 53:13	39:15 39:16 41:15 41:16	16:14	direct 44:10
convenient 51:22	41:19 41:20 42:9	defunct 47:15	directly 8:24 42:11
conversation 38:23 39:1 39:4 40:19 44:23 45:5	42:10 42:19 42:20 44:25 46:25 47:19 47:20 48:15 51:7	deposed 6:11	Disability 28:17
conversations 8:7 54:2	counsel 6:14 6:15 7:20	deposition 6:1 6:14 7:3 7:21 43:22 44:3 59:19	discriminatio n 21:20
core 31:4	couple 45:21 54:19	derecognition 54:25	discuss 37:4 39:20 44:20 57:24
corporate 6:16 6:18 7:6	Creed 28:23	deregistered 42:9 42:23 45:3 45:9 45:23 47:17 57:4 57:8	discussing 30:9
correct 17:4 17:5 19:25 20:1 21:8 21:16 22:25 23:12 23:15 23:24 24:5 24:6 24:16 24:22 24:23 24:25 25:1 25:25 26:1 26:14 26:16 26:17 26:25 27:1 28:15 28:16 28:18 28:20 28:22 28:24 29:15 29:16 30:12 30:13 34:6 34:7 35:3 35:6 35:7 35:18 36:18 38:21 38:22	criteria 28:12 28:14 29:13 CSIL 17:14 current 10:24 18:12 18:21 18:24 30:11 49:12 49:14 49:22 currently 9:6 37:9 49:25	deregistratio n 45:19 55:2	distractio n 57:22
	CSIL 17:14	described 51:21	distress 55:15
	current 10:24	detail 28:7	distribute 16:10
	18:12 18:21	details 57:6	document 13:23 25:6
	18:24 30:11	dictates 31:24 52:14	documents 57:17
	49:12 49:14	difference 27:8	drill 15:5
	49:22	different 36:5	duly 6:7
	currently 9:6	differently 28:11	during 12:8 12:19 28:5
	37:9 49:25	difficult 24:10 58:21	
	<hr/>	difficulty 26:2	<hr/>
	D	diminution 55:1	E
	<hr/>		earlier 6:11 33:13 54:23
	data 55:7		effective 29:18
	date 26:13 39:12		effectively 32:24
	dates 57:13		effort 57:12
	day 24:7 36:15 36:22		
	de 38:1		
	dealing 42:19 58:7		
	definitely		

either 38:7	43:17	54:21 59:3	extremely 36:25
eligible 20:14	52:8 54:13 57:14	examined 6:8	_____
else 27:4	emotional 55:15	example 14:22 20:2 20:16 31:12 32:10 35:5 35:15 38:3 51:20 51:23	E _____
email 11:15 11:17 13:10 13:11 14:4 14:7 14:12 14:14 14:24 15:1 15:9 15:14 15:17 15:21 15:23 15:24 16:3 16:20 17:2 17:6 17:22 18:6 18:11 18:18 18:21 19:6 19:6 20:2 21:14 21:22 22:1 24:3 24:14 26:12 38:9 39:12 42:2 42:6 42:7 43:18 44:11 51:9 51:11 52:7 54:10 58:19	empirical 55:4 employee 8:16 8:18 encouraged 38:14 enforce 34:20 enforces 36:6 engineer 33:23 engineering 33:11 33:14 33:15 33:21 enter 55:17 especially 57:4 essence 21:19 39:17 39:18 et 55:24 evening 52:12 event 9:24 events 11:6 58:4 everything 15:8 evoke 26:21 exact 25:7 32:20 45:20 52:24 59:15 EXAMINATION 7:15	except 58:23 exclude 33:14 excuse 10:21 20:13 33:5 34:2 Exhibit 13:18 13:22 16:16 16:21 43:2 43:10 43:11 43:12 44:5 exhibits 13:14 13:15 43:20 43:21 43:21 exist 33:8 exists 51:10 expect 16:10 16:14 35:24 56:14 expected 12:16 41:22 experience 22:16 22:19 32:24 50:8 55:3 55:9 56:7 express 49:10	facilities 20:20 facto 38:1 faculty 40:17 40:22 40:23 40:24 41:1 fair 19:11 19:12 23:6 34:11 34:16 35:8 35:24 36:25 37:1 38:11 38:12 44:19 46:1 46:3 46:8 46:9 46:12 47:18 47:21 48:8 48:15 48:19 48:23 48:25 50:3 50:4 50:18 52:16 52:17 53:11 53:17 fairs 20:10 48:6 52:19 58:18 58:21 faith 29:1 59:8 59:10 fall 10:10 46:1 46:4 48:6 49:8 49:16 49:18 familiar

10:20 13:22	full 7:17	Great 44:8	heard 13:9
17:1 25:3	23:18 39:23	Greenwood	help 11:6
25:5	43:18	10:23	52:9
32:20 59:15	function 51:6	group 16:15	here's 47:24
Federal 6:21	functions	22:10 25:10	he's 6:15
Fellowship	25:17 25:17	25:14 25:17	6:16 7:2
6:13 14:8	funded 21:3	25:20	23:6 24:4
Fellowship's	funding 21:6	29:6 29:8	41:4
19:15	funds 35:17	29:11 30:21	41:10 41:17
files 19:21	35:18	30:25	hesitant
finally 8:7	future 56:9	31:5	56:14
finding		31:13 31:21	hey 52:11
23:6 23:9	<hr/>	31:23	hold 20:17
fine 34:18	G	32:1 32:6	51:20
34:18	gap 45:18	32:20 32:21	human 19:16
finish 8:2	45:20	33:20 33:23	21:15 21:18
first 6:7 7:3	gay 59:5	34:12 40:18	26:20 27:21
9:18 10:1	general 11:14	44:21 46:24	28:1 28:6
10:18	37:21 50:7	47:9	28:10
13:2 13:6	generally	47:23 49:11	32:2 32:4
13:9	10:14 19:21	53:9	32:7
16:23 16:24	46:4 48:8	55:25	34:15
43:18	generic	57:7 58:2	36:5 40:4
44:2	14:4 14:6	59:1	41:24 57:16
49:21 50:11	34:5	grouped 43:16	<hr/>
form 23:14	George 43:19	44:18	I
former	getting 24:19	groups 14:4	idea 56:10
29:10 30:7	26:16	14:7 20:24	56:13
forward 18:19	gone 7:24	guess 26:18	ideal 33:21
30:8	14:19	29:20	identificatio
forwarded	16:5 44:17	guidelines	n 43:13
18:11 18:21	govern 35:9	7:25	identifying
19:3 19:7	grad 22:19	<hr/>	25:24 26:3
forwarding	graduate 8:13	H	I'll 13:21
18:13 27:3	8:25	hard 29:7	14:11 34:13
free 20:10	19:14 22:10	having 6:7	38:10 50:11
fulfill 29:8	57:1 57:3	39:4	I'm 6:17 7:24
	57:21 58:22	head 8:6 25:8	8:15 9:6
		hear 36:22	9:7 10:20
		41:1	

13:15	indicating	11:7	invited 9:24
15:8	41:17	11:22	involve 26:19
16:12 20:22	indirectly	14:7	involved 9:15
22:18	21:10	14:14	9:21 18:2
23:2 23:9	individual	15:9	18:8
24:1	11:8 59:5	15:17	30:15
24:24 32:20	individuals	16:9	33:2
35:22 40:15	11:9 11:10	19:14 19:25	40:14 49:21
45:20 46:14	inform 42:22	20:8	involvement
47:12	Information	20:13	9:18 13:2
52:4 53:5	52:9	21:4	13:6 18:10
53:13 53:20	informed	25:13 27:12	Iowa 8:12
55:14 56:14	42:11	29:4	8:17 8:25
56:16 56:21	initiated	30:19 34:13	9:12 9:19
58:11	54:12	34:13	10:21 10:21
impact 56:2	inquired	40:7	11:2 11:9
57:11	50:20 50:21	40:18 40:25	11:9
impacted	50:22	41:5 42:1	11:10
47:16	instance	42:2 42:8	13:7
impacts 55:23	57:15 58:23	42:23	14:24
56:22 56:23	instead 57:24	45:3 45:6	15:2
important	interact 11:4	45:9	15:12 15:16
27:8	interaction	45:15 45:25	16:8
58:14 58:16	10:1	46:10 46:24	16:18
impression	interest	48:12 48:18	18:3
19:14 21:15	49:10 50:7	49:21	19:24
21:23	interfere	50:2	20:6 20:9
includes	48:2	50:12	20:25
31:13	intersection	51:7	21:3 21:7
including	10:23	51:16 52:18	22:8
37:9	InterVarsity	56:7	22:17 23:23
indicate	6:12 9:8	56:25	27:12 27:20
21:14 47:10	9:12 9:14	57:3	28:1
47:22	9:15 9:19	57:16 57:21	34:12 34:15
indicated	9:22 9:23	58:15	34:19
6:15 7:21	10:1	59:6	35:3 35:9
54:2 57:13	10:10 10:25	59:10 59:13	36:6 36:7
indicates	11:5 11:5	InterVarsity'	36:21 39:24
24:21		s 13:8 25:3	40:3 41:8
		29:24	41:10 41:18
		30:1 30:5	41:22
		48:22	42:3 48:1

50:6 51:7 51:13 52:16 Iowa's 21:19 28:10 36:5 irrelevant 55:15 isn't 46:3 issue 32:7 55:5 issues 24:22 25:25 26:3 26:19 54:7 I've 18:19 23:14 56:8 <hr/> J <hr/> January 48:9 48:11 48:13 50:1 job 26:8 join 57:7 joining 49:11 June 13:10 14:1 14:17 18:23 22:2 22:5 24:11 24:15 26:13 34:2 39:9 39:23 41:12 42:2 44:13 47:17 <hr/> K <hr/> Katrina 6:2 6:7 7:2	7:19 59:20 kinds 15:2 King 17:10 17:21 18:17 knowledge 14:16 20:15 25:22 35:19 38:2 46:18 48:20 49:14 51:8 51:18 53:6 54:9 59:7 known 55:10 56:24 57:6 Kummer 6:12 7:1 40:18 45:6 54:15 Kummer's 43:21 Kutcher 11:13 13:12 17:4 22:2 22:3 24:18 24:21 25:24 36:17 36:25 42:4 <hr/> L <hr/> lack 50:7 language 24:25 38:14 40:21 large 25:20 larger 49:25 54:24 last 17:7 17:9	late 46:5 46:6 47:18 Laurynn 17:9 17:21 18:17 19:10 21:14 42:4 42:19 lawsuit 28:6 50:13 50:21 leader 29:3 29:14 30:23 32:11 37:16 37:17 38:5 55:11 55:20 55:21 56:7 56:14 59:6 leaders 14:20 16:6 16:11 16:13 18:11 22:13 27:13 29:9 29:12 31:3 31:24 33:15 33:21 37:8 37:9 38:20 40:7 40:11 42:5 56:3 56:9 58:9 leadership 17:24 18:12 18:22 18:24 27:7 27:9 27:22 27:24 28:2 29:10 29:17	29:18 29:24 30:2 30:6 30:7 30:9 31:15 34:14 37:5 37:6 37:20 37:20 38:6 39:20 41:23 45:7 48:16 54:14 56:6 56:23 57:23 learn 42:14 least 16:14 19:7 58:3 legal 31:6 31:16 32:3 32:13 33:16 34:21 36:8 level 9:4 Life 11:19 17:15 17:16 52:6 limit 50:11 limited 31:15 45:6 linked 23:14 list 19:20 25:7 listed 47:15 litigation 54:8 load 21:24 loaded 21:16 located 41:5 location 10:15
--	--	---	--

<p>long 22:17 25:8</p> <p>longer 38:16</p> <p>lot 51:25 52:1 57:12</p> <p>lowering 50:5</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>mailings 51:14</p> <p>maintain 57:10</p> <p>male 32:23 33:15 33:23</p> <p>man 32:10</p> <p>manner 28:2 48:2</p> <p>MARCH 6:4</p> <p>mark 43:2 43:5</p> <p>marked 13:16 43:11 43:12 43:24 44:2</p> <p>marriage 59:11 59:14</p> <p>mass 20:3 51:14 58:19</p> <p>master's 9:2 12:3 12:24</p> <p>matter 40:8 55:4</p> <p>may 30:14 31:8 31:18 32:5 33:18 33:23</p>	<p>34:23</p> <p>maybe 46:4 50:6 51:22 51:25 54:2</p> <p>mean 11:3 11:9 15:7 18:4 21:10 22:2 29:1 36:20 40:16 47:12 49:13 55:9</p> <p>medical 52:23</p> <p>meet 10:18</p> <p>meeting 29:14 52:12</p> <p>meetings 10:15 20:17 49:24 53:12 54:24 57:23 58:8</p> <p>member 10:9 40:17 40:22 40:23 40:24 56:25 57:3</p> <p>members 49:15 58:22 58:25</p> <p>membership 10:12 47:16 49:12 49:14 49:22 49:23 50:6 54:14 56:24</p> <p>Memorial 20:9</p> <p>memory 42:13</p> <p>Mennonite 10:18</p>	<p>Messiah 8:22</p> <p>mind 31:24</p> <p>minister 7:2</p> <p>ministry 57:20</p> <p>mission 31:4</p> <p>mm-hmm 8:6 16:25 55:18</p> <p>moment 34:8</p> <p>month 38:4</p> <p>monthly 49:24 54:24</p> <p>months 12:6 12:9 12:17 12:20 12:25 22:20 45:21</p> <p>morning 6:11 24:11</p> <p>move 19:5 22:1</p> <p>moving 23:11</p> <p>multiple 38:7</p> <p>Myrtle 10:22 10:22</p> <p>myself 16:13 16:14 37:10</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>national 25:9 25:14</p> <p>necessarily 32:23 37:7 58:24</p> <p>negative 55:23</p>	<p>nervous 7:3</p> <p>Nicole 7:19</p> <p>nodding 8:6</p> <p>nonbeliever 28:25 29:3 29:21 30:8 30:18</p> <p>normal 8:7</p> <p>nothing 59:2 59:7</p> <p>notice 15:4 49:24</p> <p>notices 15:2</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>object 55:14</p> <p>objection 31:6 31:16 32:3 32:12 33:16 34:21 36:8 46:14 55:17</p> <p>obviously 34:5</p> <p>occur 44:24</p> <p>occurring 24:11 36:16</p> <p>occurs 46:3</p> <p>October 10:2</p> <p>offense 23:8</p> <p>offer 47:24</p> <p>office 17:14 52:6</p> <p>officially</p>
---	--	---	--

51:5	24:24	46:3 46:7	11:13 11:19
Oh 7:14 43:9	25:9	46:10 46:23	17:13 19:22
okay 7:20 8:3	25:13 25:16	47:21	31:2 58:13
8:9 8:11	25:23	48:1 48:4	organize 11:6
8:21 9:7	26:2 26:8	48:8	OrgSync 19:17
9:9 9:10	26:11	48:11 48:18	19:18 19:19
9:11 9:15	27:6	48:21 48:24	21:16 21:24
9:18 9:25	27:19	49:4 49:8	22:25
10:3 10:6	28:9	49:20	original
10:9	28:14 28:21	50:1 50:5	13:13 18:21
10:14 10:17	29:3 29:9	50:10 50:19	others 16:9
10:24 11:15	29:13 29:21	51:9	48:5 54:7
11:18 11:22	30:4	51:16 52:18	otherwise
11:24	30:18	53:3 53:8	10:3 58:22
12:2 12:5	31:1	53:19	overlap 43:17
12:15	31:12 31:23	54:5	
13:2 13:6	32:10	54:10 54:13	P
13:13 13:17	33:1 33:7	55:8	p.m 44:13
13:18 13:20	34:1 34:4	55:16 59:16	page 13:22
14:22	34:11 34:17	ones 58:14	16:23 16:24
15:1 16:7	35:8	openly 59:5	17:7 17:9
16:21	35:12 35:15	opinion	17:20 18:16
17:1	36:4	31:9 34:19	18:20
17:12	36:20 36:24	opposed 8:5	19:9 24:2
18:2	37:11 37:15	20:17 51:20	24:10 26:12
18:16	37:23	opposing 6:15	34:1
19:5 19:9	38:1 38:9	59:11 59:14	36:12
19:13 19:23	38:13 38:25	ordinary 6:20	39:7 39:7
20:2 20:8	39:6	organization	39:11 41:11
20:12 20:16	39:22	19:24	43:18 43:20
20:20 20:23	40:6 40:9	26:6	pages 25:7
21:18 21:22	40:15 40:22	27:10 42:22	paragraph
22:1 22:5	41:1 41:4	46:11 46:20	26:22
22:10 22:13	41:4 41:8	47:11 47:13	parking 53:13
22:16 22:22	41:11 41:14	48:12 52:9	partially
22:24	41:17	Organization/	58:6
23:2 23:5	42:1 42:7	Student	participate
23:8	42:14 42:18	52:6	45:25 46:11
23:11 23:14	43:1 43:5	Organizations	46:21 47:18
23:22	44:8		
24:1 24:7	44:15 44:23		
24:9	45:1 45:8		
24:14 24:21	45:15 45:22		

48:24	Ph.D 9:2	portion 40:14	53:9 59:9
participated	9:3 12:2	position	previous 9:23
48:14	physical	12:11 46:15	10:4
particularly	10:15	positions	14:20
57:13 58:14	physically	37:11	16:6
58:16	49:4 49:6	possible	17:24 18:11
past 42:24	physics 8:15	38:11 40:21	previously
58:5	plaintiff 7:1	potential	6:11 13:16
pay 20:25	plans 57:24	18:2 18:5	private 20:18
47:2	play 29:20	24:24 26:19	20:23 51:21
paying 20:21	please 7:12	30:9	53:12
pending 28:6	8:5 16:22	38:20	Procedure
Pennsylvania	27:14 34:25	45:2 56:9	6:22
8:23	36:13 43:6	potentially	process 41:23
people	point 14:19	38:14 54:5	56:8 57:9
12:12 28:11	17:25 23:22	preoccupied	professor
29:10 52:14	25:2	58:6	36:22
56:15 56:15	25:23 27:11	prepare 57:20	professors
per 37:23	27:15 27:19	presence	41:2
perhaps 16:13	30:14	7:9 48:22	program
period	39:4	present	8:14 8:15
13:25 14:21	39:22 40:12	6:13 6:16	9:2 9:3
22:5	41:22	58:18	12:2
22:14 28:5	42:8	president	proper 56:10
permission	42:18 44:19	9:13 9:23	property
52:3	48:16 49:24	10:4 11:1	20:17
permitted	49:25 52:24	11:3	proposed
46:21	57:5 57:5	11:11	39:19 39:25
person 11:16	points 55:7	16:8	40:3 41:19
personal	policies	30:11 30:19	prove 55:5
15:14 15:17	29:24	37:12 37:13	55:6
16:2 55:9	30:2 30:6	37:15 37:18	provide 7:8
personally	34:20	37:23	8:5 32:24
15:22 16:17	policy	38:1 38:5	48:4
16:19 45:11	26:22 27:21	press 42:15	provided
55:8	28:2 28:7	42:16	12:16
person's 30:8	28:10 34:15	pretty	20:6 21:3
	36:5 36:6	36:16 46:7	54:15
	40:4 41:24	prevent	

provides 32:21 51:14 58:13	36:15 56:12	refer 13:18 37:20	27:13 29:18
purpose 11:25 29:8 30:21 30:25 31:20 31:23 32:1 32:19 32:20 33:20 33:23	recall 6:19 9:25 13:11 42:15 42:17 42:24 52:21 52:23 59:12	referring 51:12	remain 57:19
puts 39:8	receipt 15:21	regarding 39:2	remember 54:11
<hr/> Q <hr/>	receive 13:25 14:3 14:5	regardless 12:11 21:6	rent 20:21 20:25 47:2
question 8:2 8:4 8:8 15:25 23:6 27:14 34:25 52:16	received 14:17	registered 19:22 19:23 20:24 31:2 46:10 46:16 46:16 46:20 46:24 48:12 51:6 57:19 58:13	rephrase 8:8 REPORTER 7:13 43:4 43:7 43:11 53:22 53:24
questioning 50:24	receives 19:25	registration 57:10	represent 47:8
questions 54:18 54:19 59:16	recess 53:23	regular 11:6	representativ e 6:16 6:18 7:6
quickly 27:16 36:16	recipient 17:22 18:7	regularly 11:11 11:12	require 57:12
quite 25:19 35:13	recollection 42:21	regulations 34:20 35:6 35:9 35:12	required 37:19
<hr/> R <hr/>	record 6:10 6:17 6:23 7:18 47:15 53:22 53:24	related 11:22 15:8 15:16 18:18 42:16	requirements 34:14
RA 8:19 8:20 12:8	recruit 47:6 49:6 58:17	relatively 25:20	reregistered 45:10 45:16 57:19
race 28:14	recruiting 49:8	relaying 42:5	reregistratio n 45:19
rather 27:16	recruitment 20:9 46:1 46:12 47:18 50:18 52:19 58:18 58:20	release 42:16 42:16	research 35:22 35:23 36:2
RCOs 33:3	redacted 16:2 17:21	Religion 28:21	resources 32:22 32:25
reading 57:15	redirect 54:20	religious	respond 16:17 16:20 18:8
ready 56:19			responding 19:10
really			response 18:3 18:5 39:2

<p>responsive 36:17 36:17</p> <p>rest 37:4 37:19 44:21</p> <p>restate 27:14 34:24</p> <p>restriction 27:7</p> <p>restrictions 27:22 27:24 28:3 31:3 35:16</p> <p>review 26:6 59:17</p> <p>rights 19:16 21:15 21:18 26:20 27:21 28:1 28:7 28:10 32:2 32:4 32:7 34:15 36:5 40:4 41:24 57:16</p> <p>role 9:7 9:11 10:24 26:5 38:5 38:8</p> <p>roles 37:18 37:21</p> <p>room 6:13 6:17 51:24 52:15 52:25</p> <p>rooms 51:17 52:1 52:12</p> <p>RSO 51:6</p> <p>RSOs 33:5</p>	<p>rules 6:21 6:21 35:5 35:9 35:12</p> <p>rush 56:20</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>satisfactory 39:3</p> <p>saw 29:11</p> <p>scheduling 11:7</p> <p>school 8:25 10:6 46:7 48:9 52:2 58:23</p> <p>Schrock 6:2 6:7 6:14 7:2 7:19 7:20 8:11 59:20</p> <p>Science 33:3</p> <p>se 37:24</p> <p>second 13:22 16:23</p> <p>seeing 23:2 24:24</p> <p>seem 58:9</p> <p>seems 14:4</p> <p>seen 19:1</p> <p>sees 24:21 26:3</p> <p>select 27:13 30:18 30:22 31:14</p> <p>selected 29:9 29:22 29:22</p> <p>selection</p>	<p>30:16 31:24 41:23</p> <p>semester 46:4</p> <p>send 16:9 16:13 52:7</p> <p>sense 26:9 32:16 32:18 47:22</p> <p>September 46:4</p> <p>sequestration 6:21</p> <p>serve 29:12</p> <p>service 19:20</p> <p>serving 9:13</p> <p>several 24:22 25:25 26:3</p> <p>sex 59:11 59:14</p> <p>She's 7:3</p> <p>short 53:20</p> <p>shorten 9:8</p> <p>shown 57:15</p> <p>sign 59:17 59:18</p> <p>signed 34:5</p> <p>significant 57:14</p> <p>signing 55:10</p> <p>similar 31:3 57:17</p> <p>siren 15:5</p> <p>site 53:16 53:18</p> <p>situation 50:23 56:12</p>	<p>56:16 57:5</p> <p>size 52:14</p> <p>skeptical 57:2 57:7</p> <p>skills 29:17 29:18</p> <p>somebody 27:4 52:15</p> <p>somehow 45:2</p> <p>someone 52:5 59:1</p> <p>sorry 7:14 40:15 43:10</p> <p>source 21:6</p> <p>space 51:17 52:19</p> <p>speak 6:24 8:2 50:8 51:5</p> <p>speaker 29:19</p> <p>speaking 8:3 55:8 56:9</p> <p>specific 14:7 16:20 51:11</p> <p>specifically 45:6 50:17</p> <p>specifics 42:17</p> <p>speculation 31:7 32:13 33:17</p> <p>spend 57:12 57:14</p> <p>spent 57:18</p> <p>spoke 40:7</p>
--	---	--	---

40:17 40:19	11:19 14:11	38:15	45:4
staff 11:13	14:24	successor's	50:12 51:19
40:25 41:5	15:9	30:15	51:24
stage 9:4	17:13 17:15	suggesting	52:2 56:23
25:24	17:16 19:22	38:10 38:13	talked 56:22
stands 17:14	19:23	summer 12:5	talking 17:17
started 46:8	26:6 31:2	12:8	24:15 40:13
starting 44:5	35:2 35:6	12:17 12:19	40:16
starts 48:9	35:10	12:25 22:20	45:1
state 7:17	36:7	45:23	54:23 58:12
stated 11:1	36:21 42:22	58:2 58:4	teaching
16:5	46:11 46:20	58:5	35:20
32:19 33:19	47:10 47:13	Summers 40:23	team 18:12
statement	47:23 48:12	54:3	18:22 18:24
6:10 59:8	50:7	54:10 54:14	29:10
59:10	50:17	support 32:22	30:7 37:5
states	52:5 52:8	32:25 33:22	37:6
25:11 26:21	58:13	suppose 32:15	37:20 37:21
status 8:11	students	supposed	38:6
stay 7:2	22:11 22:20	35:17	39:20 45:7
7:5 7:8	33:15	sure 7:24	tenets
22:20 57:11	47:6 49:6	43:19 46:14	59:13 59:15
step 30:14	49:9	47:12 53:13	terribly 25:8
38:4 38:8	50:10 50:11	surrounding	testified 6:8
steps 45:10	50:12 50:16	54:7	18:6 33:13
45:11	51:23 58:17	swear 7:11	testimony
stipend 12:12	58:22	sworn 6:7	6:20 47:14
12:15 35:15	studies 12:19	system 20:3	Thank 17:19
35:24	style 8:4	20:5 24:4	37:2
stressful	subject	<hr/>	43:14 54:17
58:9	6:19 6:20	T	there's 31:12
strongly	35:5	<hr/>	33:10 37:23
38:14	submission	TA 8:19 12:8	47:14 51:25
student	23:3	table 47:4	52:1 55:6
8:13 9:13	submit	47:9 47:24	58:24
11:1 11:3	23:15 23:20	taking 12:22	thesis 12:24
11:13 11:18	42:1 42:3	talk 29:7	they're 30:24
	submitted	38:6 38:20	they've 43:16
	19:16 25:10		
	subscribe		

third 9:6 22:18 Thursday 6:4 52:12 timeframe 10:10 timely 24:19 36:25 tissue 56:17 today 13:4 14:23 16:7 51:5 top 39:6 41:11 44:11 tornado 15:5 track 19:20 transitional 14:20 treasurer 37:18 treat 28:11 treated 46:16 treatment 27:8 trial 6:19 7:7 try 52:2 trying 18:8 56:3 57:9 57:18 Tuesday 39:9 tuition 21:11 Twice 12:1 types 58:1 typical 56:7 typically	10:18 11:17 <hr/> U <hr/> unavailable 38:4 uncertain 20:22 undergrad 8:21 8:22 22:14 undergraduate 9:16 understand 8:8 13:4 19:18 20:5 25:13 26:5 26:23 27:6 28:9 28:25 36:21 40:2 41:18 understanding 30:6 32:21 39:23 41:21 understood 19:19 unfolded 27:16 Unfortunately 36:24 Union 11:20 11:25 20:9 20:25 46:1 49:4 51:24 United 25:11	university 7:5 7:7 8:12 8:16 8:24 9:12 9:14 9:19 10:7 10:20 11:4 11:10 13:7 14:24 15:12 15:16 16:7 16:18 18:3 18:14 19:20 19:22 19:24 20:6 20:13 20:17 20:24 21:2 21:7 21:19 23:23 27:12 27:20 27:25 28:10 34:12 34:15 34:19 35:2 35:8 35:24 36:4 36:6 36:7 36:20 37:19 39:24 40:2 40:13 40:16 40:20 41:22 42:3 42:15 42:17 48:1 50:1 50:6 51:7 51:13 55:24 57:8 57:11 university's 46:15	unless 58:25 unwilling 7:7 updated 19:15 21:15 23:15 23:20 23:24 upon 15:21 Usually 58:3 utilize 51:17 utilized 52:18 <hr/> V <hr/> vein 50:24 viable 47:10 47:12 47:22 vice 37:12 37:23 38:1 view 36:4 41:2 viewed 40:3 violate 40:4 violates 32:2 32:4 32:6 <hr/> W <hr/> Wade 40:23 54:3 ways 58:25 web-based 19:19 website 23:18 we'd 52:11 we'll 26:11 we're 8:3 8:6 13:4 17:17
---	---	---	--

24:7	works 17:13		
24:14 26:13	write 27:6		
39:8			
43:20	writing 26:25		
44:5	27:2 27:3		
53:22 53:24	27:5 41:14		
we've 44:2	wrote 27:4		
44:17			
WHEREUPON	<hr/>		
43:12 53:23	Y		
59:19	<hr/>		
whether 34:19	yesterday		
39:3 55:1	15:4		
white 32:10	you'll 18:20		
32:22	you've 7:21		
whoever 16:1			
whom 16:4			
winter 48:6			
48:8 48:15			
witness			
7:12 30:5			
31:9			
31:19			
32:6			
32:15 33:19			
34:24 36:10			
43:14 46:18			
55:19			
women 31:13			
31:13 31:15			
32:11 32:22			
33:2			
33:10 33:14			
33:20			
work 11:11			
17:8			
35:25 57:10			
58:23			
working 12:24			

EXHIBIT E

EXHIBIT	
4	
DEPONENT NAME:	DATE:
Schrock	3/28/19

From: **Student Organization Help & Information** <CSIL-Student-Org@uiowa.edu>
Date: Tue, Jun 12, 2018 at 1:07 PM
Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents
To: "Schrock, Katrina N" <[REDACTED]@uiowa.edu>, Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>, "King, Laurynn L" <laurynn-king@uiowa.edu>
Cc: "[REDACTED]" <[REDACTED]@uiowa.edu>, "[REDACTED]" <[REDACTED]@uiowa.edu>, "[REDACTED]" <[REDACTED]@uiowa.edu>, "kummer50@[REDACTED]" <[kummer50@\[REDACTED\]](mailto:kummer50@[REDACTED])>

Hi Katrina,

I would say go ahead and discuss that with the rest of your leadership and I'll discuss it with our university attorney to make sure they are on board. I don't want to tell you something that is incorrect.

Best,

Andy

From: Schrock, Katrina N
Sent: Tuesday, June 12, 2018 11:25 AM
To: Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>
Cc: [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; kummer50@[REDACTED]
Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Andy,

Thank you for your clarification! Obviously, I will need to discuss any changes with the rest of the leadership team, but I do have a question. Would changing the language of the constitution from "must subscribe..." to something like "are requested to subscribe..." or "are strongly encouraged to subscribe..." make it so that the constitution is no longer contradictory? Again, I will need to discuss changes, but your input on this matter is greatly appreciated.

Thank you,

Katrina

From: Student Organization Help & Information
Sent: Tuesday, June 12, 2018 11:19 AM
To: Schrock, Katrina N <[REDACTED]@uiowa.edu>; Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>
Cc: [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED]

██████████ <██████████@uiowa.edu>; kkummer50@██████████

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Katrina,

I recognize the wish to have leadership requirements based on Christian beliefs, however Registered Student Organizations are considered University of Iowa programs and thus must follow the Human Rights Clause in its entirety. Having a restriction on leadership related to religious beliefs is contradictory to that clause.

I'm happy to chat further about this and provide any information I can.

Best,

Andy

Andy Kutcher, M.Ed. <image001.jpg>145 Iowa Memorial Union
he, him, his Iowa City, Iowa 52242-1317
Coordinator for Student Organization Development 319-335-3059 Fax 319-353-2245
Center for Student Involvement & Leadership getinvolved@uiowa.edu
andrew-kutcher@uiowa.edu
<http://csil.uiowa.edu>

Adaptability | Harmony | Positivity | Consistency | Arranger

[Schedule an appointment with me](#)

From: Schrock, Katrina N
Sent: Tuesday, June 12, 2018 11:02 AM
To: Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>
Cc: ██████████ <██████████@uiowa.edu>; ██████████ <██████████@uiowa.edu>; ██████████ <██████████@uiowa.edu>; kkummer50@██████████
Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Andy,

I would guess that the issues you see involve potential contradictions to the part of the Human Rights Clause that states: "In no aspect of its programs shall there be any difference in the treatment of persons...". From my reading, the language of the constitution does not contradict the later part of the Clause, which states: "...equal access to membership, programming, facilities, and benefits shall be open

to all persons". Membership, events, and other facets of the group are not restricted – the only restriction is specifically for leadership positions.

While I understand that this leadership restriction can be construed as a difference in treatment, it is also important to have Christian leadership in a Christian organization. We do not in any way discourage those who may not subscribe to the basis of faith in Article II from participating in IVGCF as members, but we do recognize that having Christian leadership is important to the fulfillment of our purpose. ✓

The above are my thoughts, but I am open to having further dialogue on the matter.

Katrina

From: Student Organization Help & Information
Sent: Tuesday, June 12, 2018 10:43 AM
To: Schrock, Katrina N <[REDACTED]@uiowa.edu>; Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>
Cc: [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; kummer50@[REDACTED]
Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Katrina,

On my initial review I see several issues. As part of compliance with the Human Rights Clause, organizations cannot have any language deemed contradictory to that Clause. I'm seeing potential contradictory language in Articles II, III, IV and VII. The language is directly related to the ability to become a member or to hold leadership positions.

Please let me know your thoughts, questions or concerns. I want to make sure this is clear.

Best,

Andy

From: Schrock, Katrina N
Sent: Tuesday, June 12, 2018 10:27 AM
To: Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>
Cc: [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; kummer50@[REDACTED]
Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Andy,

I've now used the form you linked to submit the updated constitution. Please let me know if there is anything else you need from us, and thank you for your quick reply and for checking into the submission.

Katrina

From: Student Organization Help & Information

Sent: Tuesday, June 12, 2018 10:06 AM

To: Schrock, Katrina N <[REDACTED]@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>

Cc: [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; kummer50@[REDACTED] Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Hi Katrina,

Did you use the OrgSync form (<https://orgsync.com/14241/forms/311661>) to submit? I'm not seeing your submission in the form or on the InterVarsity Graduate Christian Fellowship's OrgSync portal.

Best,

Andy

From: Schrock, Katrina N

Sent: Tuesday, June 12, 2018 9:25 AM

To: King, Laurynn L <laurynn-king@uiowa.edu>

Cc: [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; kummer50@[REDACTED] Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Laurynn,

I was under the impression that the InterVarsity Graduate Christian Fellowship's constitution had been updated with the Human Rights clause, and submitted to OrgSync on either the 1st or 2nd of June. If this is not the case, I would appreciate if you would let me know as soon as possible, so that we can make the required changes.

Thank you,

Katrina

From: King, Laurynn L

Sent: Tuesday, June 12, 2018 9:15 AM

To: [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>

Cc: Schrock, Katrina N <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; kummer50@[REDACTED] Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Thank you for your reply, [REDACTED]. It is important to keep your OrgSync profile updated with your new leadership team's contact information up-to-date, so we are able to reach out to the most current representatives.

Enjoy your day,

Laurynn

Laurynn King

she, her, hers

Administrative Services Coordinator
Center for Student Involvement & Leadership

laurynn-king@uiowa.edu

<http://csil.uiowa.edu>

Relator // Competition // Futuruistic // Woo // Belief

<image002.jpg>

157 Iowa Memorial Union
Iowa City, Iowa 52242-1317
319-335-3059 Fax 319-353-2245
getinvolved@uiowa.edu

From: [REDACTED]

Sent: Tuesday, June 12, 2018 9:11 AM

To: King, Laurynn L <laurynn-king@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>

Cc: Schrock, Katrina N <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; [REDACTED] <[REDACTED]@uiowa.edu>; kummer50@[REDACTED]

Subject: Re: InterVarsity Graduate Christian Fellowship Governing Documents

Hi Laurynn,

We forwarded the original email to the current leadership team. Both [REDACTED] and I are no longer serving on the team. I believe they were working on updating this information, but I have CC'd them on this email.

Thanks,

██████████

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "King, Laurynn L" <laurynn-king@uiowa.edu>

Date: 6/12/18 8:44 AM (GMT-06:00)

To: "██████████" <██████████@uiowa.edu>, "██████████" <██████████@uiowa.edu>

Subject: InterVarsity Graduate Christian Fellowship Governing Documents

██████████ -

I am following up to several communications our office has sent regarding InterVarsity Graduate Christian Fellowship Governing Documents on campus. Our office has you listed as contacts for this student organization.

We've sent a few e-mails, and also left voicemails, over the past few months regarding the need to update the organization's governing documents to include the University of Iowa's Human Rights clause. **The updated document(s) are due tomorrow, June 13th or your student organization will be placed on unregistered status.**

Please let me know a status update on these documents, or if you have any questions regarding the updates, and I can assist you.

Thank you in advance,

Laurynn

Laurynn King

she, her, hers

Administrative Services Coordinator
Center for Student Involvement & Leadership
laurynn-king@uiowa.edu

<image002.jpg>
157 Iowa Memorial Union
Iowa City, Iowa 52242-1317
319-335-3059 Fax 319-353-2245
getinvolved@uiowa.edu

<http://csil.uiowa.edu>

Relator // Competition // Futuruistic // Woo // Belief

Notice: This UI Health Care e-mail (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521 and is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you are not the intended recipient, any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy all copies of the original message and attachments thereto. Email sent to or from UI Health Care may be retained as required by law or regulation. Thank you.



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

- COURT REPORTING
- LEGAL VIDEOGRAPHY
- VIDEOCONFERENCING
- TRIAL PRESENTATION
- MOCK JURY SERVICES
- LEGAL TRANSCRIPTION
- COPYING AND SCANNING
- LANGUAGE INTERPRETERS

INTERVARSITY CHRISTIAN FELLOWSHIP/USA, et al.,

Plaintiffs,

vs. Civil Action No. 18-cv-00080-SMR-SBJ

THE UNIVERSITY OF
IOWA, et al.,

Defendants.



DEPOSITION AND TRIAL



(800) 528-3335

NAEGELIUSA.COM

DEPOSITION OF
ANDREW KUTCHER

TAKEN ON
THURSDAY, MARCH 28, 2019
10:38 A.M.

UNIVERSITY PARK RESEARCH CENTER
2500 CROSSPARK ROAD, ROOM W219
CORALVILLE, IOWA 52241

IVCF App. 2658

IVCF App 2267

2	<p>1 APPEARANCES</p> <p>2</p> <p>3 APPEARING ON BEHALF OF THE PLAINTIFFS:</p> <p>4 Daniel H. Blomberg, Esquire</p> <p>5 THE BECKET FUND FOR RELIGIOUS LIBERTY</p> <p>6 1124 Park West Boulevard, Suite 204</p> <p>7 Mt. Pleasant, SC 29466</p> <p>8 (202) 349-7222</p> <p>9 (202) 955-0090 (Fax)</p> <p>10 dblomberg@becketlaw.org</p> <p>11</p> <p>12 Eric Baxter, Esquire</p> <p>13 THE BECKET FUND FOR RELIGIOUS LIBERTY</p> <p>14 1200 New Hampshire Avenue NW, Suite 700</p> <p>15 Washington, D.C. 20036</p> <p>16 (202) 955-0095</p> <p>17 (202) 955-0090 (Fax)</p> <p>18 ebaxter@becketlaw.org</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	4
3	<p>1 APPEARANCES CONTINUED</p> <p>2</p> <p>3 APPEARING ON BEHALF OF THE DEFENDANTS:</p> <p>4 George A. Carroll, Esquire</p> <p>5 Iowa Attorney General's Office</p> <p>6 1305 East Walnut Street</p> <p>7 Des Moines, IA 50319</p> <p>8 (515) 281-4931</p> <p>9 George.carroll@ag.iowa.gov</p> <p>10</p> <p>11 Nathan E. Levin, Esquire</p> <p>12 OFFICE OF THE GENERAL COUNSEL, UNIVERSITY OF IOWA</p> <p>13 120 Jessup Hall</p> <p>14 Iowa City, IA 52242</p> <p>15 (319) 384-3340</p> <p>16 (319) 335-2830 (Fax)</p> <p>17 Nathan-levin@uiowa.com</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	5

1	<p>INDEX</p> <p>2 Page</p> <p>3</p> <p>4 EXAMINATION BY MR. BLOMBERG 6</p> <p>5</p> <p>6 EXAMINATION BY MR. CARROLL 130</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	4
---	--	---

1	<p>EXHIBITS</p> <p>2 Exhibit Page</p> <p>3</p> <p>4 13 CONSTITUTION OF HAWKAPELLAS 68</p> <p>5</p> <p>6 14 CONSTITUTION OF LOVE WORKS 70</p> <p>7</p> <p>8 15 EMAIL STRING 73</p> <p>9</p> <p>10 16 FAQs RSO 81</p> <p>11</p> <p>12 17 REPLY TO SUMMARY JUDGMENT 108</p> <p>13</p> <p>14 18 LIST 124</p> <p>15</p> <p>16 19 LIST 126</p> <p>17</p> <p>18 20 CONSTITUTION OF WOMEN IN 131</p> <p>19 SCIENCE</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	5
---	--	---

6

1 DEPOSITION OF
 2 ANDREW KUTCHER
 3 TAKEN ON
 4 THURSDAY, MARCH 28, 2019
 5 10:38 A.M.
 6
 7 ANDREW KUTCHER, having been first duly sworn, was
 8 examined and testified as follows:
 9 EXAMINATION
 10 BY MR. BLOMBERG:
 11 Q. Mr. Kutcher, my name is Daniel Blomberg.
 12 I'm an attorney for the plaintiffs in this case.
 13 Can you please say your full name for the
 14 record?
 15 A. Andrew Martin Kutcher.
 16 Q. Thank you. Have you ever been deposed
 17 before?
 18 A. No.
 19 Q. Okay. Just a few ground rules. I'm sure
 20 your attorneys have worked with you about it but
 21 just as background, if you could help me by letting
 22 me finish all of my sentences before you give me an
 23 answer, and then when you give an answer, if you
 24 could give a verbal answer so instead of mm-hmm or
 25 unh-unh, a yes or a no. We always say mm-hmm and

7

1 unh-unh anyway, but you know, it's just to have the
 2 awareness.
 3 If you don't understand my question, if
 4 I'm not being clear or if it's a compound question,
 5 please just feel free to ask me to repeat it or ask
 6 for clarification. We just want to make sure that
 7 we're clearly understanding each other.
 8 A. Okay.
 9 Q. Can you tell me how long you've been
 10 employed with the University of Iowa?
 11 A. I've been in my current role since
 12 December 5, 2017. Prior to that I also worked for
 13 the university as a temporary secretary.
 14 Q. Okay.
 15 A. Starting sometime in September. There was
 16 a break in my employment sometime in October and
 17 then I resumed that role as a temporary secretary
 18 later in the month of October.
 19 Q. Okay. So your initial employment with the
 20 university started in September 2017?
 21 A. Technically, my initial employment with
 22 the university started when I was a student.
 23 Q. Okay. And what was that role?
 24 A. My first official role at the university
 25 was when I worked for Orientation Services as their

8

1 inventory control person.
 2 Q. Okay. And about when was that?
 3 A. That was in the summer of 2011.
 4 Q. And, but your current role started
 5 December 2017; is that right?
 6 A. Yes, December 5, 2017.
 7 Q. Okay. Let's see. Do you understand that
 8 you're here today as a witness on your own behalf
 9 and as a witness on behalf of the University of
 10 Iowa?
 11 A. Yes.
 12 Q. Let me just show you what we marked
 13 yesterday as Exhibit 1.
 14 I see what you mean, George. It's a tight
 15 binder.
 16 Do you recognize this document?
 17 A. Yes.
 18 Q. Can you identify it for the record?
 19 A. It's my -- it's the -- is this my required
 20 to appear today?
 21 Q. It says Notice of Rule 30(b)(6)
 22 deposition. Is that correct?
 23 A. Oh, yes.
 24 Q. Okay. And do you see where it says by
 25 name, it says the University of Iowa and then down

9

1 at the bottom it says through Andrew Kutcher for
 2 topics two, four, five, and eight of Exhibit A?
 3 A. Yes.
 4 Q. And if you turn a couple pages in that
 5 document, do you see where there's a page entitled
 6 at the top Exhibit A?
 7 A. Yes.
 8 Q. All right. And have you seen topics two,
 9 four, five, and eight previously?
 10 A. Yes.
 11 Q. Okay. Are you prepared to testify about
 12 those today?
 13 A. Yes.
 14 Q. Did you review any documents in
 15 preparation for today's deposition?
 16 A. Yes.
 17 Q. What documents did you review?
 18 A. I reviewed a document that has a listing
 19 of our student organization conduct cases and I
 20 reviewed two documents of listing of OrgSync have
 21 been deregistered since 2017.
 22 Q. Okay. And then the conduct cases, can you
 23 describe what that means, what's going on there?
 24 A. Sure. Alleged behavioral issues for our
 25 student organizations and the findings and outcomes

10

1 for those cases.
 2 Q. And how far back does that stretch?
 3 A. To January 1, 2017.
 4 Q. Okay. And about how many conduct cases
 5 are listed on there?
 6 A. I believe it was between 20 and 30.
 7 Q. Okay. Were any of those conduct cases
 8 related to the human rights clause that is enforced
 9 under the registration of student organizations
 10 policy?
 11 A. Yes. The – I'm sorry, yes, the Business
 12 Leaders in Christ case.
 13 Q. Okay. Any other ones?
 14 A. No.
 15 Q. All right. So the only disciplinary
 16 conduct matter that was listed on that document was
 17 – I'll call them BLinC – the BLinC case?
 18 A. Yes.
 19 Q. Okay. What, without getting into any
 20 details, what are the general types of other types
 21 of conduct issues that are listed on there?
 22 A. Misbehavior related to alcohol, hazing.
 23 Those are the two that most come to mind. I'm
 24 failing to remember the other ones at the moment.
 25 Q. That's fine. And what was the second

12

1 Q. Other than speaking to your legal counsel,
 2 which please don't ta k to me about that, but did
 3 you speak with anyone in preparation for today's
 4 deposition?
 5 A. Yes.
 6 Q. Who did you speak to?
 7 A. Angela Ibrahim-Olin, the director of
 8 Student Accountability at the University of Iowa,
 9 and Kristi Finger, who works in Event Services, who
 10 helped me identify where the second two documents
 11 lived in our files.
 12 Q. Okay. Was there anything else that you
 13 discussed with Ms. Finger?
 14 A. No.
 15 Q. Okay. And then the first individual you
 16 identified, what did you discuss with her?
 17 A. I discussed being able to get access to
 18 the student conduct cases since 2017.
 19 Q. Anything else?
 20 A. No.
 21 Q. Okay. Was there anyone else that you
 22 talked with –
 23 A. No.
 24 Q. – other than your attorneys?
 25 A. I talked with Dr. Bill Nelson, but Bill

11

1 document you mentioned that you reviewed?
 2 A. I reviewed two documents that were student
 3 organizations that have been deregistered since
 4 2017, both – one was in the spring of 2017 and one
 5 was the fall of 2017. And these were organizations
 6 that failed to reregister through our process at
 7 that time.
 8 Q. So the two – this is two documents about
 9 organizations that were deregistered. Both
 10 documents were from 2017?
 11 A. Correct.
 12 Q. And how many groups were listed on the
 13 first document?
 14 A. Around 20 or so.
 15 Q. Okay. And how many were deregistered for
 16 reasons related to noncompliance with the human
 17 rights clause?
 18 A. To my knowledge, none of them.
 19 Q. Okay. And what about the other document?
 20 Were there any groups that were deregistered related
 21 to reasons about the human rights clause?
 22 A. Not to my knowledge.
 23 Q. Okay. Have those documents been produced
 24 to your attorney?
 25 A. Yes.

13

1 did not have any documents that were helpful for me
 2 in this preparation.
 3 Q. So he didn't give you any documents or he
 4 just – he gave you documents and they weren't
 5 helpful?
 6 A. He gave me documents. They weren't
 7 helpful.
 8 Q. Okay. What documents did he give you?
 9 A. They were sanctioning letters for some of
 10 these cases, but didn't give me an indication as to
 11 what the cases were necessarily about.
 12 Q. And so they weren't any of the letters
 13 that you saw that related to student group
 14 violations of the human rights clause?
 15 A. No, there were not.
 16 Q. Okay. Did you speak with anyone else in
 17 preparation for the deposition?
 18 A. No.
 19 Q. And did you look at any other – review
 20 any other documents in preparation for the
 21 deposition?
 22 A. I reviewed Docket 17-2 and 101-1 from the
 23 Business Leaders in Christ for the University of
 24 Iowa case.
 25 Q. Okay. Great. We'll ta k about those in a

14

1 bit.

2 Today's deposition is a little bit

3 different from other depositions, not that you'll

4 notice since this is your first one, but a lot of

5 the facts of the case have already been – the

6 parties have discussed in front of the court and

7 there are some admissions that have already been

8 made. So a lot of what we'll be talking about today

9 is some of the background behind those facts, the

10 reasons that went into decisions that were made and

11 who was involved in those sorts of things. So I

12 just want to give you a little bit of background on

13 that.

14 Can you talk to me about your duties at

15 the university?

16 A. My role is to support and have general

17 oversight over registered student organizations that

18 we advise through the Center for Student Involvement

19 and Leadership. And those are organizations that

20 would not include our social fraternities and

21 sororities and our sport clubs.

22 Q. Okay. So you're not over the social

23 fraternities and sport clubs or, yeah, the social

24 fraternities, sororities, and sport clubs?

25 A. Correct.

15

1 Q. Are they managed through another part of

2 the Student Affairs Office?

3 A. There is a separate entity, our Fraternity

4 and Sorority Life staff that are members of the

5 Center for Student Involvement and Leadership that

6 have direct oversight over the social fraternities

7 and sororities, and through our Recreational

8 Services Department, a group of staff advise our

9 sport clubs.

10 Q. Okay. Is one of your duties related to

11 student organization development?

12 A. Yes.

13 Q. And talk to me about what that means.

14 A. Generally speaking, student organization

15 development is meant to provide our organizations

16 with guidance, support, and knowledge. We want our

17 students to have learning experiences through their

18 organizations and sometimes that means giving them

19 presentations or consulting with them to make sure

20 that they are, you know, operating the best that

21 they can when they may be struggling with issues.

22 Q. And what would be some of the kind of

23 marks of a healthy group? What would be some of the

24 things that you're looking for to help them achieve?

25 A. It's different for each group based on

16

1 that group's goals. But broadly speaking, we would

2 look for a group that is able to recruit members and

3 the members they wish to recruit, and being able to

4 have healthy turnover and transition of leaders.

5 Groups that are, you know, functioning in the ways

6 that are outlined in their governing documents,

7 hosting the events that they want to be able to host

8 and getting attendance there. For some groups that

9 success is being able to travel, provide

10 professional development, or academic support to

11 students who are all within a similar department.

12 Q. And so – and the university provides

13 registered student organizations a number of

14 benefits; correct?

15 A. Correct.

16 Q. And are those benefits geared toward

17 helping achieve a lot of the things that you just

18 talked about?

19 A. Yes, they are.

20 Q. And would you – are there any particular

21 ones that you really find, you know, healthy groups

22 are often utilizing this sort of thing?

23 A. Not necessarily. There's not one benefit

24 that we would identify a group uses to say that

25 they're a healthy organization. Again, each group

17

1 is different and we want them to be able to operate

2 with their own goals in mind.

3 Q. Would you say that it's going to be

4 helpful to the health of a student organization to

5 come to one of the student recruitment fairs?

6 A. Potentially, yeah.

7 Q. And what about using like the mass

8 emailing and things like that to communicate with

9 students to let them know about their events, is

10 that going to help them with, you know, having well-

11 attended events like you were talking earlier?

12 A. Potentially. Students receive a lot of

13 mass emails and a lot of them get deleted by

14 students, so.

15 Q. Is there a more effective way of

16 communication? Like, so, for instance, the

17 university provides, you know, I think like the

18 digital displays in the IMU. Is that an effective

19 way to communicate with students?

20 A. It can be depending on the targeted

21 audience.

22 Q. So for organizations that would want to

23 use something like that it can be effective in

24 helping communicate?

25 A. Yes.

18

1 Q. All right. What about doing things like,
 2 you know, chalking the sidewalks or hanging signs in
 3 the Hubbard Park fence, you know, those kind of
 4 communication tools? Are those things that, you
 5 know, you would see healthy groups using?
 6 A. I don't know if I would say that our
 7 healthy groups use those necessarily. We don't see
 8 a lot of groups that take advantage of that, or at
 9 least I don't personally see that. So it's hard for
 10 me to say.
 11 Q. All right. So it could be, it couldn't
 12 be, it just --
 13 A. Yeah.
 14 Q. -- it just depends on the group?
 15 A. Yeah.
 16 Q. Okay. Are one of your other duties being
 17 a part of the Student Organization Review Committee?
 18 A. Yes.
 19 Q. Can you talk to me about what that means?
 20 A. Sure. The Student Organization Review
 21 Committee is a group of staff and students from
 22 around the university who are brought together to
 23 make determinations on whether or not we register a
 24 student organization that wants to start new on our
 25 campus.

19

1 Q. Okay. So it's the initial process when
 2 they're first coming to you?
 3 A. Yes.
 4 Q. Okay. Who's responsible for reviewing
 5 kind of reregistration?
 6 A. Myself and my counterpart also review
 7 reregistration as groups are currently active and
 8 looking to stay active. Or for groups that have
 9 maybe spent a year away or a year deactive and want
 10 to restart.
 11 Q. Okay. And who is your counterpart?
 12 A. His name is Lucas Visser.
 13 Q. Okay. And the students that you mentioned
 14 earlier who are a part of that initial review
 15 committee, who are they? Are they just like --
 16 okay, who are they?
 17 A. Staff from the Center for Student
 18 Involvement and Leadership. There is a staff member
 19 from Student Accountability. We have a staff member
 20 from the Division of Student Life VP's office. We
 21 have a staff member from the General Counsel's
 22 Office, who sits as an ex-officio officer on the
 23 committee. Three members of our Recreational
 24 Services tea sit on that group. I'm trying to make
 25 sure. And then representatives from both

20

1 undergraduate and graduate student government.
 2 Q. And would those be the students that are
 3 on the committee --
 4 A. Yes.
 5 Q. -- the student government?
 6 A. Yes.
 7 Q. And it's not the whole student government,
 8 specific representatives who are kind of attached to
 9 it?
 10 A. Correct.
 11 Q. Okay. And what do they do? Do they all
 12 look at the same constitution or do you kind of
 13 split it up and look at different constitutions?
 14 A. It's the job of myself and my counterpart
 15 to review constitutions ahead of time, help make
 16 sure that they're the best working document that are
 17 going to be for our organizations, and bring that
 18 information and our information from our official
 19 registration form before the committee so they can
 20 make decisions.
 21 Q. And do you like make a recommendation on
 22 whether they should accept it or not?
 23 A. We don't make a recommendation. We will
 24 provide insight into what the org is looking to do
 25 but we don't make any formal recommendation and say

21

1 we believe this group should or should not be
 2 registered.
 3 Q. Okay. And then they make the decision on
 4 the registration?
 5 A. Correct.
 6 Q. Okay. Is it like an equal vote for all
 7 members of the committee or --
 8 A. Yes.
 9 Q. Okay. Let's see. And are there any
 10 particular criteria they're looking at to determine
 11 that a group should be registered? What are some of
 12 the things they're looking for?
 13 A. The committee really looks for reasons
 14 that we can't register a group, whether that be a
 15 policy issue that's in place, some kind of legal
 16 concern, or significant risk management concerns.
 17 Q. What would be an example of a risk
 18 management concern?
 19 A. The sky diving club.
 20 Q. Okay. That makes sense.
 21 A. Was agreed to be registered if they were
 22 able to meet certain documentation of safety. They,
 23 unfortunately, were not able to do that.
 24 Q. And what about the legal risk concern?
 25 What would be an example of a legal risk that would

22

1 be an issue?
 2 A. I'm not sure. I've not seen a legal risk
 3 in my time working on the Student Organization
 4 Review Committee that I can remember.
 5 Q. Okay. What about policy considerations?
 6 What are some of the recurring policy issue
 7 considerations?
 8 A. Sure. Student organizations are not
 9 allowed to provide a professional service. And it
 10 seems like every year we get a group from the Tippie
 11 College of Business that want to start a brokerage
 12 organization and hold money for students, which we
 13 do not allow.
 14 Q. Anything else as a typical policy issue?
 15 A. Not that I can recall.
 16 Q. Do you typically run into situations where
 17 someone submitted a constitution that raises
 18 concerns with the human rights clause?
 19 A. Not typically, no.
 20 Q. All right. When it does come up, how have
 21 you seen it come up?
 22 A. We've seen it come up through students
 23 wanting to either select members or leaders based on
 24 a protected class in that clause.
 25 Q. And what would be some examples of that?

23

1 A. If a student organization wanted to only
 2 select their leaders based on the fact that they
 3 were Jewish.
 4 Q. Are there any nonreligious criteria that
 5 you've seen that student groups have asked about?
 6 A. Yes. We have seen it with related to
 7 gender. And some groups starting that wanted to be
 8 all-female groups through the College of
 9 Engineering.
 10 Q. And were those groups permitted to be all-
 11 female groups or what happened in those situations?
 12 A. They were not allowed to be all-female
 13 groups. They had to be open to everyone.
 14 Q. Were they allowed to encourage their
 15 members to be female?
 16 A. Yes.
 17 Q. Do you as part of the Student Organization
 18 Review Committee, do you look at constitutions for
 19 Greek groups or for sport clubs or is that in that
 20 separate department you were talking earlier?
 21 A. We do not look at them for our
 22 fraternities and sororities. We do not typically
 23 look at them for sport clubs, although we have in
 24 the past. The way our registration process works,
 25 sometimes students come to us and we'll look at

24

1 things first before sending it over to Rec Services
 2 to see if they want to make that group a sport club.
 3 Q. Okay. And is there any particular reason
 4 why they would come to you first?
 5 A. Potentially because our office is listed
 6 first on our website. They may see that first and
 7 reach out to us first. Or we've had several groups
 8 that have reached out to us to register because
 9 they've heard from a friend that we're the people to
 10 do that with.
 11 Q. And do you have the same kind of policy-
 12 based review that you do for those sport clubs that
 13 come to you first?
 14 A. Yes.
 15 Q. Okay. And have you had any issues under
 16 the human rights clause where someone, a sport club
 17 has asked to, you know, be registered and you've had
 18 to ask them to change their constitution for some
 19 reason?
 20 A. Not to my knowledge.
 21 Q. Are new sport clubs allowed to have men's
 22 or women's groups?
 23 A. I don't know.
 24 Q. And you haven't faced that in any of the
 25 sport clubs that you've processed?

25

1 A. Not in the ones that I can remember from
 2 our previous SORC meetings.
 3 Q. Do you know why until, I think it was last
 4 fall, that Greek groups weren't required to have
 5 constitutions?
 6 A. I don't know.
 7 Q. And is it -- am I remembering it correctly
 8 that it was last fall when they started having
 9 constitutions?
 10 A. Yes.
 11 Q. All right. Do you know if they all have
 12 constitutions now?
 13 A. I don't know.
 14 Q. Do you know if the university would have
 15 possession of the constitutions if they had been
 16 created?
 17 A. Yes, I believe they would.
 18 Q. Can you talk to me about the fall and
 19 winter student organization fairs? We touched on it
 20 a little bit. Can you just tell me a little bit
 21 more about it?
 22 A. Sure. The student involvement fairs are
 23 designed to give groups an opportunity to recruit
 24 new members, especially students who are new to our
 25 campus in the fall and the spring.

26

1 Q. I apologize. I forgot to mention this
 2 earlier. If you need to take a break for any
 3 reason, if you want to just like catch your breath,
 4 fresh air, use the bathroom, whatever —
 5 A. Sure.
 6 Q. — anytime, just let me know.
 7 A. Thank you.
 8 Q. All right. So to the recruitment fairs.
 9 And how does that — how does it work? Like do
 10 people just kind of show up or what's the process?
 11 A. We have a sign up form that we ask that
 12 they register to be involved in that just so we know
 13 who's coming. Depending on the location of the
 14 fair, we do our best to categorize our groups. So
 15 people looking for certain interest areas have an
 16 easier time finding that. It also helps us be able
 17 to direct students where they might be looking for a
 18 specific group.
 19 Q. Do you help students come to the student
 20 fairs? I mean, do you advertise it —
 21 A. We do.
 22 Q. — and try to make it attractive for the
 23 students to come?
 24 A. We do.
 25 Q. And why is that?

27

1 A. We want students to be involved on our
 2 campus. Studies show that their involvement helps
 3 their retention and helps them academically.
 4 Q. And when you say retention, you mean their
 5 retention to the school, like they'll stay at the
 6 school longer?
 7 A. Yes.
 8 Q. Okay. And then when you say it helps them
 9 academically, their academic performance goes up if
 10 they're a part of a student group?
 11 A. Studies have shown us that. Yes.
 12 Q. Okay. That's interesting.
 13 And so those fairs are an important part
 14 of the process of kind of getting them in the door
 15 and connecting them with a student organization?
 16 A. Yes.
 17 Q. Is that kind of connected with the — I
 18 think it's the Pick One initiative?
 19 A. Yes. It is somewhat connected with the
 20 Pick One initiative.
 21 Q. And so is the idea with Pick One that you
 22 want to really encourage a student to pick at least
 23 one student group because then they have those
 24 benefits you were talking about?
 25 A. Yes.

28

1 Q. All right. And what kinds of things do
 2 you do to help people Pick One?
 3 A. We do our best to provide them an
 4 opportunity to be in front of those groups and to
 5 meet with them and find out more about them through
 6 the involvement fair.
 7 Q. What are some of your — what are some of
 8 your, kind of your biggest and most successful
 9 student organizations on campus, including sport
 10 clubs and Greek groups and all that? What would be
 11 some examples of that?
 12 A. Sure. Success would be defined by each
 13 group a little bit differently. Some of our largest
 14 groups, Dance Marathon is our largest student
 15 organization and one that's very well known around
 16 campus. Many people often don't realize that
 17 Homecoming is a student organization that partners
 18 with athletics and several other university entities
 19 to throw the week of Homecoming together.
 20 Q. How do, as a group, how do Greek groups
 21 compare to the other groups in terms of, you know,
 22 size? Are they larger, smaller, about the same?
 23 A. It depends on the Greek organization.
 24 They can range in size from five members up to 200
 25 or so members depending on the group.

29

1 Q. Do you have many groups on campus that are
 2 in that kind of upper category that have 200
 3 members?
 4 A. I don't know.
 5 Q. Were you a part of any student groups as
 6 an undergrad or a graduate student?
 7 A. Yes.
 8 Q. What student groups did you attend?
 9 A. I was in undergrad a part of Associated
 10 Residence Halls.
 11 Q. And did you attend graduate school?
 12 A. Yes.
 13 Q. And did you participate in a graduate —
 14 or a student group in that time?
 15 A. No.
 16 Q. Why did you want to join the student group
 17 that you were a part of?
 18 A. My first year on campus a friend of mine
 19 came into my room and said, hey, you should do this.
 20 And I did. And I liked it. And my sophomore and
 21 junior year I became the president of the
 22 organization.
 23 Q. Did you find that it benefitted you?
 24 Like, it was a good experience for you?
 25 A. It was a good experience.

30

1 Q. In what ways? How was it good?

2 A. It connected me to a lot of people that I

3 wouldn't have had connections with that were outside

4 of the friend group I had already made on campus.

5 It helped me academically. It gave me access to

6 other people who helped me explore some different

7 majors. It also gave me good professional

8 experience running an organization, conducting

9 meetings, putting agendas together, you know,

10 meeting with staff and lobbying for the ideas and

11 the changes we wanted to make.

12 Q. What other staff in your office work

13 specifically with registered student organizations?

14 You mentioned Lucas, I believe, earlier.

15 A. Yeah. Lucas Visser is the other

16 coordinator for Student Organization Development.

17 And then our supervisor, Paul Mintner, is an

18 associate director in the Center for Student

19 Involvement and Leadership. And then our FSL staff

20 work with specifically our fraternities and

21 sororities.

22 Q. So FSL stands for?

23 A. Fraternity and Sorority Life. I

24 apologize.

25 Q. No, no, no. That's fine. That's fine.

31

1 It's in part for the record. I could google it and

2 find out but --

3 A. Sure.

4 Q. -- yeah.

5 Are there any groups, any staff that are

6 specifically focused on say multicultural students

7 or international students or anything like that? Or

8 sorry, multicultural or international student

9 organizations?

10 A. Not in our office. There are staff at the

11 university who advise those groups.

12 Q. So would those be like the specific group

13 advisors or is it somebody who works with the group

14 as a class?

15 A. I don't know how it's defined for those

16 staff.

17 Q. I might be getting this completely wrong,

18 but is there a Ms. Shuhui Lin that works with your

19 team?

20 A. Yes. Shuhui Lin used to --

21 Q. That's how to say it.

22 A. -- used to work in the Center for Student

23 Involvement and Leadership when our multicultural

24 affairs staff were a part of our office and they

25 were branched out to be a part of their -- to be

32

1 their own office.

2 Q. Okay. And do you know what she did as a

3 part of your office?

4 A. Lin, as she goes by, advised our Chinese

5 Students and Scholars Association, our Indian

6 Student Alliance, and I'm not sure if there were

7 others. She had a dual appointment to our office

8 and to the Center for Diversity and Enrichment.

9 Q. Is there any particular reason why she had

10 those types of groups that she was working with?

11 Was it, you know, just to kind of help them flourish

12 on campus or --

13 A. I'm not sure.

14 Q. Okay. Can you describe your work with Dr.

15 Nelson?

16 A. Sure. Dr. Nelson supervises my

17 supervisor.

18 Q. Okay. And your supervisor would be Mr. --

19 A. Paul Mintner.

20 Q. -- Paul Mintner, who you mentioned

21 earlier. Okay.

22 And how often do you interact with Dr.

23 Nelson?

24 A. Fairly frequently.

25 Q. Would you say on a daily basis, a weekly

33

1 basis?

2 A. On a weekly basis.

3 Q. And what does that interaction primarily

4 look like? Is it via email, via phone, face to

5 face, it varies?

6 A. It varies. Typically, it's been face to

7 face since he just works down the hall. Yeah.

8 Q. And Dr. Melissa Shivers, what's the nature

9 of your interaction with her?

10 A. I'm sorry, as far as how much interaction

11 I have with her?

12 Q. Just what kind of interaction with her? I

13 mean, do you have almost none because it all goes

14 through Paul and Dr. Nelson or is it, you know, what

15 does it look like?

16 A. I have a limited amount of interaction

17 with her, usually at her request.

18 Q. Okay. Are you familiar with the

19 University of Iowa policy entitled Registration of

20 Student Organizations?

21 A. Yes.

22 Q. All right. And is that the policy that

23 has the language with the human rights clause in it

24 that we were discussing earlier?

25 A. I believe it has -- I believe it

34

1 references the human rights clause.
2 Q. Do you know if that policy is part of the
3 policy that requires student organizations to
4 include the human rights clause in their
5 constitutions?
6 A. I believe it is.
7 Q. And it also requires them not to include
8 anything that is contradictory to the human rights
9 clause?
10 A. I don't know.
11 Q. Okay. Were you involved at all in the
12 university's decision to derecognize BLinC in 2017?
13 A. No.
14 Q. All right. Were you aware of it?
15 A. I was made aware of it after the lawsuit
16 was filed.
17 Q. And that would be in part because you kind
18 of came on to your current role in December 2017?
19 A. Correct.
20 Q. Okay. So you were aware of it after that
21 point but not as it was in the lead up to the
22 lawsuit?
23 A. Correct.
24 Q. Okay. Who did you -- who made you aware
25 of it?

35

1 A. Dr. Bill Nelson and my supervisor at the
2 time, Dr. Anita Cory.
3 Q. Okay. And what was the nature of their
4 communication with you about it?
5 A. They wanted to inform me that a lawsuit
6 had been filed, and at that point they didn't have a
7 whole lot of other information.
8 Q. Did you discuss the meaning and
9 application of the -- I'll call it the RSO policy --
10 the policy we were talking about earlier -- with Dr.
11 Nelson in that timeframe in December 2017?
12 A. I don't recall.
13 Q. Do you recall having any discussions in
14 that timeframe regarding the RSO policy as it
15 relates to student leadership selection?
16 A. I don't recall.
17 Q. All right. Do you recall any discussion
18 about the application of the policy to BLinC,
19 specifically?
20 A. I don't recall.
21 Q. At what point did you gain an
22 understanding of what the RSO policy, I'm sorry,
23 means for student leadership selection in a RSO?
24 A. Can you repeat the question?
25 Q. Absolutely. Absolutely.

36

1 So at what point did you kind of gain an
2 understanding about what the RSO policy means for
3 student groups and their selection of leaders?
4 A. Okay. I think I'm understanding.
5 I gained that knowledge when we started to
6 do review of all of our student organization
7 constitutions.
8 Q. And about when was that?
9 A. It was -- we started in the middle to end
10 of January of 2018.
11 Q. And how did you get that knowledge?
12 A. I don't remember.
13 Q. What was your understanding of what the
14 policy meant for student groups in their selection
15 of leaders?
16 A. Sure. My understanding of the policy was
17 that student organizations are required to select
18 leaders only based on their merits and as not having
19 any relation to the protected classes or
20 characteristics in the human rights clause.
21 Q. And so that would mean that a religious
22 student group couldn't ask its religious -- its
23 leaders to be religious?
24 A. Correct.
25 Q. Okay. Are you aware of a Federal District

37

1 Court order that came down in late January 2018
2 regarding the BLinC case?
3 A. Yes.
4 Q. Did you review that order?
5 A. I don't think so.
6 Q. You don't?
7 A. I don't know.
8 Q. Okay. Do you know if anyone in your
9 office gave it to you to look at?
10 A. I don't recall.
11 Q. Do you recall getting a copy of it via
12 email?
13 A. No.
14 Q. Or did anyone I ke hand it to you or put
15 it on your desk?
16 A. No.
17 Q. So at this point you don't recall having
18 read the District Court's ruling, the Federal
19 Court's ruling from January 2018?
20 A. I know the ruling happened. I don't
21 recall whether or not I've read the document.
22 Q. Did you get an understanding of what the
23 ruling meant?
24 A. Yes.
25 Q. And what was that understanding?

38

1 A. It was an injunction placed on the
 2 university from further action taken against BLinC.
 3 Q. And did the ruling have anything to do
 4 with concerns about selective enforcement?
 5 A. I don't know.
 6 Q. And just to define the terms, so selective
 7 enforcement would be where you have an uneven or an
 8 unequal application where some groups are allowed to
 9 select their religious leaders based on their
 10 religious faith. Other groups aren't. Did you have
 11 any awareness of that kind of concern in the
 12 opinion?
 13 A. Yes.
 14 Q. So would your understanding have been then
 15 that the Federal Court said that you can't have
 16 uneven application of the human rights clause to
 17 student groups?
 18 A. Can you repeat that?
 19 Q. Mm-hmm. So would your understanding then
 20 be of the court's ruling that you're not permitted
 21 to have an unequal application of the policy to
 22 student groups?
 23 A. Yes.
 24 Q. Okay. So it just has to be equal and
 25 across the board?

39

1 A. Yes.
 2 Q. Okay. Do you know if Bill Nelson reviewed
 3 the ruling?
 4 A. I don't know.
 5 Q. Do you know if Dr. Shivers did?
 6 A. I don't know.
 7 Q. Do you know if President Harreld did?
 8 A. I don't know.
 9 Q. Did you receive any training on the
 10 meaning of the ruling?
 11 A. No.
 12 Q. Did you meet with anybody about what the
 13 ruling meant?
 14 A. Yes.
 15 Q. Who did you meet with?
 16 A. Dr. Bill Nelson.
 17 Q. Anyone else?
 18 A. I don't remember if anyone else was
 19 present.
 20 Q. And what did Dr. Nelson say to you about
 21 it?
 22 A. He informed me that an injunction was in
 23 place and that that injunction would have impact on
 24 our upcoming student involvement fair because I
 25 believe it was the next day.

40

1 Q. Okay.
 2 A. And that was the basis of our
 3 conversation.
 4 Q. So was he saying that BLinC was going to
 5 be able to participate in that fair because of the
 6 injunction?
 7 A. Yes.
 8 Q. Okay. At what point did you become
 9 involved in starting up the review process or being
 10 involved in the review process of all of the student
 11 group organizations?
 12 A. In January of 2018.
 13 Q. And what was your role?
 14 A. My role was to, for a lot of it, to
 15 conduct the review.
 16 Q. Did you do -- did you review all 500
 17 constitutions?
 18 A. No.
 19 Q. All right.
 20 A. Not by myself.
 21 Q. Who did you have helping you?
 22 A. Several staff from our office helped in
 23 that initial review in January. There was no one
 24 external. Everyone worked in our office at the
 25 time.

41

1 Q. Do you recall specifically who in your
 2 office was helping you?
 3 A. Paul Mintner, Anita Cory, Kristi Finger.
 4 So I guess that would be the one external to our
 5 office. Tabitha Wiggins, Jamal Nelson, Jesus Payan,
 6 Kyle Fowler, Lori Marshall. I'm failing to remember
 7 if anyone else was --
 8 Q. That's completely fine. That's great.
 9 So did you -- so you had 500 constitutions
 10 to review.
 11 A. Correct.
 12 Q. Did you divide up and each of you take a
 13 certain number?
 14 A. Yes.
 15 Q. Was there about an equal percentage across
 16 the board or some of you had more and some of you
 17 had less?
 18 A. Some had more and some had less, it just
 19 depended on how much time people could dedicate to
 20 do it.
 21 Q. And did you at any point review all 500 or
 22 did you just do your portion?
 23 A. At that time I had just done my portion.
 24 Q. All right. And then at a later point had
 25 you reviewed all of them?

42

1 A. Yes.
 2 Q. So all 500?
 3 A. Yes.
 4 Q. Okay. The university has admitted that it
 5 set up the review in part to check to see if groups
 6 were requiring their leaders to embrace certain
 7 beliefs or purposes. Does that sound correct to
 8 you?
 9 A. Yes.
 10 Q. All right. Were you involved in looking
 11 for those kinds of beliefs or purposes?
 12 A. Yes.
 13 Q. And what kind of beliefs or purposes were
 14 you looking for?
 15 A. Beliefs or purposes that would have
 16 excluded someone based on the human rights clause.
 17 Q. So if it was a belief or purpose that
 18 would not be related to a category in the human
 19 rights clause, that wouldn't have been something you
 20 would have flagged.
 21 A. Correct.
 22 Q. Okay. And would that, to your knowledge,
 23 would that be something that would violate the human
 24 rights clause?
 25 A. To my knowledge, it would not.

43

1 Q. Okay. The university admitted that it had
 2 reviewers look at the religious groups first?
 3 A. Yes.
 4 Q. Were you involved in that initial review?
 5 A. Yes.
 6 Q. And why were you instructed to look at the
 7 religious groups first?
 8 A. I don't know. It was because we were – a
 9 lawsuit had been filed regarding religious beliefs.
 10 Q. So because the BLinC group was a religious
 11 group?
 12 A. Correct.
 13 Q. Okay. Were there any other specific
 14 categories of groups that were reviewed as a
 15 category, or the rest kind of reviewed in total?
 16 A. The rest were reviewed all at once.
 17 Q. Okay. Was – were the religious groups
 18 reviewed once or more than once?
 19 A. I don't recall.
 20 Q. Let me show you what was marked as Exhibit
 21 2 in yesterday's deposition with Dr. Shivers.
 22 Can you just take a look at that for a
 23 second and let me know once you've had a chance to
 24 look at the first page and the second page.
 25 A. Okay.

44

1 Q. Does that, either the cover email or the
 2 list in Exhibit 2, does that look familiar to you at
 3 all?
 4 A. I've seen the listing of these
 5 organizations before.
 6 Q. Were you involved in compiling that list?
 7 A. Yes.
 8 Q. What's the date on the email from Dr.
 9 Nelson?
 10 A. February 7, 2018.
 11 Q. So would you have been involved sometime
 12 prior to February 7th in compiling the list?
 13 A. Yes.
 14 Q. Did anyone assist you with it?
 15 A. Yes.
 16 Q. Who helped you?
 17 A. Kristi Finger helped me to compile the
 18 list.
 19 Q. And who had you – who directed you to
 20 compile the list?
 21 A. Dr. Nelson.
 22 Q. And did he tell you why he wanted the
 23 list?
 24 A. I don't recall.
 25 Q. Did you do anything else with the list

45

1 after providing it to Dr. Nelson?
 2 A. I don't recall.
 3 Q. Do you know if anybody else did?
 4 A. I don't know.
 5 Q. Did you ever compile any other list of
 6 student organizations based on a category?
 7 A. Yes.
 8 Q. What were those lists?
 9 A. Those lists were compiled for the
 10 involvement fair so we could place organizations
 11 into categories to help people find them.
 12 Q. Okay. And as a part of the review process
 13 that you were doing, did you ever compile people
 14 into similar lists or was the religious groups the
 15 only ones that were compiled into a group specific
 16 list?
 17 A. I believe the religious groups were the
 18 only ones compiled into a specific list.
 19 Q. When did you finish the initial review and
 20 determine how many of the approximately 500 groups
 21 had compliant constitutions?
 22 A. I believe it was sometime in early
 23 February.
 24 Q. So the initial review was finished of all
 25 500 constitutions?

46

1 A. Yes.

2 Q. And what was your -- the conclusion of the

3 review about how many student groups had compliant

4 constitutions?

5 A. I don't remember the exact number.

6 I'm sorry, your question was?

7 Q. How many student groups had compliant

8 constitutions, roughly?

9 A. I believe it was around 200.

10 Q. If Dr. Nelson had testified that it was

11 about 157, would that -- would you have any reason

12 to think that was incorrect?

13 A. No.

14 Q. Okay. Does that seem like a good rate of

15 compliance or a low rate of compliance to you?

16 A. It seems like a low rate of compliance.

17 Q. Do you have a sense on why the rate of

18 compliance would have been so low?

19 A. Yes.

20 Q. Why?

21 A. Based on our procedures and how the

22 university had operated to that point, and

23 historically there's been one person in this role,

24 there had never been, at least to my knowledge, a

25 review of all student org constitutions to that

47

1 point and we've had organizations on campus going

2 back to, the oldest one to my knowledge, 1921.

3 Policies have changed since then, including the

4 human rights clause, and I don't believe there were

5 reviews when that clause changed to update some of

6 those governing documents that would then be out of

7 date.

8 Q. So was the issue that they had conflicting

9 language, was that the bulk of the problem? Or was

10 the issue they just didn't have the most up-to-date

11 version of the human rights clause?

12 A. The bulk of the problem was that they

13 didn't have the most up-to-date human rights clause.

14 Q. Okay. And, but all of those constitutions

15 would have been initially reviewed and approved by

16 someone within the university?

17 A. Yes.

18 Q. Do you know how many constitutions were

19 determined to have language that contradicted the

20 human rights clause? Not just an incomplete human

21 rights clause but contradictory language in their

22 constitution?

23 A. Based on that review?

24 Q. Mm-hmm.

25 A. I don't off the top of my head.

48

1 Q. Do you know if it was more than 100 or

2 less than 100?

3 A. I believe it was less than 100.

4 Q. More than 50 or less than 50?

5 A. I don't know.

6 Q. So it could be around 50 but it's less

7 than 100 you think?

8 A. I believe so.

9 Q. Okay. Let me show you Exh bit 3 that was

10 marked in yesterday's deposition. If you could just

11 take a look at it for me and see if that looks

12 familiar. And just let me know when you're ready.

13 A. Okay.

14 Q. Does the email appear to be from you?

15 A. Yes.

16 Q. Do you recognize the email?

17 A. Yes.

18 Q. Do you recall sending the email at the

19 date and timestamp of Friday, June 1, 2018, at 3:12

20 p.m.?

21 A. Yes.

22 Q. And is the recipient of the email Kevin

23 Kummer?

24 A. Yes.

25 Q. Do you know who Mr. Kummer is?

49

1 A. Yes.

2 Q. Who is he?

3 A. He's the advisor for InterVarsity Graduate

4 Christian Fellowship.

5 Q. So this email is to InterVarsity Graduate

6 Christian Fellowship?

7 A. Yes.

8 Q. All right. And what was the email about?

9 A. The email was about becoming compliant

10 with the human rights clause in their constitution.

11 Q. Who instructed you to send this email?

12 A. Dr. Shivers.

13 Q. Did she directly instruct you or did that

14 come through Dr. Nelson?

15 A. She directly instructed me.

16 Q. Okay. And about when did she instruct you

17 to send that email?

18 A. She instructed me on the 31st to work to

19 get all student organizations into compliance with

20 the human rights clause.

21 Q. Did anyone review the text of this email

22 before it went out besides yourself?

23 A. Yes.

24 Q. Who did?

25 A. Dr. Nelson, I believe, reviewed it, as

50

1 well as counsel.
2 Q. Was there anyone else that was aware that
3 you were sending the email apart from, you know,
4 reading the actual text of it but that knew you were
5 sending it?
6 A. Yes.
7 Q. Who?
8 A. Anita Cory.
9 Q. So why did you send this email to
10 InterVarsity Graduate?
11 A. Based on our review they did not have the
12 most up-to-date human rights clause in their
13 constitution and there was language that was deemed
14 to be contradictory to the human rights clause.
15 Q. Is the language that was deemed to be
16 contradictory specified in this email?
17 A. No.
18 Q. Had you personally reviewed InterVarsity
19 Graduate's constitution before this email went out?
20 A. I don't recall.
21 Q. Do you know who might have if it wasn't
22 you?
23 A. If it wouldn't have been me, I don't know.
24 Q. Okay. It would have been one of those
25 members on that team that we talked about earlier?

51

1 A. Yes.
2 Q. And you did at some point review all 500?
3 A. Yes.
4 Q. So you would have reviewed InterVarsity
5 Graduate sometime before this email going out?
6 A. No, that review happened after this email
7 would have been sent.
8 Q. Okay. When did that take place?
9 A. That happened earlier this fall.
10 Q. Okay. About when?
11 A. I believe it was in November.
12 Q. So in November 2018?
13 A. Yes.
14 Q. Okay. And why did you review all 500 in
15 November 2018?
16 A. To ensure that every organization had the
17 human rights clause in it.
18 Q. Okay. Was this the first time that you or
19 anyone in your office had emailed InterVarsity
20 Graduate specifically about needing to update their
21 constitution?
22 A. I don't know.
23 Q. All right. Did you -- do you have any
24 recollection of sending another email to them?
25 A. Yes.

52

1 Q. All right.
2 A. After this email was sent.
3 Q. Thank you. Before this email was sent?
4 A. No.
5 Q. Okay. And you don't have any knowledge of
6 anyone else sending an email to them?
7 A. No.
8 Q. Okay. Have you searched your email to
9 determine if you have anyone prior to this that were
10 -- that went to InterVarsity Graduate?
11 A. Yes.
12 Q. All right. And when you did that search
13 you didn't see any?
14 A. No, I did not.
15 Q. Okay. Do you know if anyone else has
16 performed a search like that?
17 A. I don't know.
18 Q. All right. Had you ever sent an email
19 like this before to any student groups?
20 A. Yes.
21 Q. When?
22 A. April 20th.
23 Q. And who did those emails go to?
24 A. Those went to student organizations that
25 were, that again, were deemed to not have compliant

53

1 governing documents.
2 Q. And why did some groups get it on April
3 20th and some groups get it on June 1st?
4 A. Because I mistakenly forgot to include
5 some groups in my April 20th email.
6 Q. Okay. About how many people -- how many
7 groups were getting the June 1st email that hadn't
8 been on the April 20th?
9 A. I don't recall.
10 Q. Do you have an estimate?
11 A. I don't.
12 Q. Would it be more than 50?
13 A. Potentially.
14 Q. All right. More than 100?
15 A. I don't know.
16 Q. Okay. So potentially more than 50, you
17 really just don't know beyond that?
18 A. Yeah.
19 Q. Okay. Is it common to send an email about
20 deregistration with a two-week deadline or is that a
21 little faster than usual?
22 A. I don't know if there's a standard set for
23 it.
24 Q. Have you sent them emails like that?
25 A. No.

54

1 Q. Okay. Are you aware if anyone else in
 2 your office who's sent an email that says you have
 3 two weeks or you will be deregistered?
 4 A. I'm not aware.
 5 Q. Okay. June 1, 2018, at 3:12 p.m., it was
 6 a Friday afternoon.
 7 A. Yeah.
 8 Q. In the summer. In your experience, is
 9 that a time that's particularly easy to get a hold
 10 of students or it's going to be a little slower
 11 student response?
 12 A. It's going to be a slower student
 13 response.
 14 Q. Is there any particular reason that this
 15 time was chosen other than that Dr. Shivers had said
 16 the day before it needs to go out?
 17 A. No.
 18 Q. Okay. And then how did you – so you
 19 accidentally didn't include them on the April 20th
 20 email. At what point was it discovered, oh, we've
 21 got some group of 50-plus that we haven't emailed
 22 yet. How did that come about?
 23 A. On the 31st of May, when I was given the
 24 direction to send this out, through looking through
 25 the orgs that we'd emailed and who needed to be

55

1 emailed, I discovered that I had made that mistake.
 2 Q. So when Dr. Shivers had talked to you
 3 about it she wasn't saying, oh, there's this group
 4 that we missed. Let's make sure we email them. It
 5 was, let's just finish out the process. And as you
 6 were going through to finish out the process you
 7 discovered there were these other groups that hadn't
 8 gotten emailed?
 9 A. Yes.
 10 Q. Okay. Do you have a list anywhere of
 11 which groups received this email on June 1st?
 12 A. I don't know.
 13 Q. Would all of the groups, you know, all the
 14 emails that went out like this, would they be in
 15 your sent box?
 16 A. Yes.
 17 Q. All right. So InterVarsity got one and
 18 some other group got one, and some other group. We
 19 have all those?
 20 A. Yes.
 21 Q. Have you produced those to your attorney?
 22 A. Yes.
 23 Q. Okay. Do you know if you sent an email
 24 like this to Love Works?
 25 A. I don't know.

56

1 Q. All right. Do you recall sending one to
 2 Love Works?
 3 A. I don't recall.
 4 Q. Do you recall if you sent one either on
 5 June 1st or April 20th to Love Works?
 6 A. I don't recall.
 7 Q. Do you know if you sent one to
 8 Hawkapellas?
 9 A. I don't recall.
 10 Q. Do you know if you sent one to Iowa Edge?
 11 A. I don't recall.
 12 Q. What about Spectrum UI?
 13 A. I don't recall.
 14 Q. The Caribbean Student Association?
 15 A. I don't recall.
 16 Q. Okay. Women in Science and Engineering?
 17 A. I don't recall.
 18 Q. The UI Veterans Association?
 19 A. I don't recall.
 20 Q. Intersection?
 21 A. I don't recall.
 22 Q. Do you know if you emailed any of the
 23 sport clubs about constitutional compliance issues?
 24 A. I did not.
 25 Q. Okay. Do you know who did?

57

1 A. The Recreational Services staff. I don't
 2 know if they emailed them but they did contact them
 3 about it.
 4 Q. And what were they contacting them about?
 5 A. About ensuring that all those
 6 constitutions had – were compliant with the human
 7 rights clause.
 8 Q. Okay. And in that communication to the
 9 sport clubs, were the sport clubs told that part of
 10 compliance required them to do away with men's and
 11 women's sport clubs?
 12 A. I don't know.
 13 Q. You don't have any knowledge that that
 14 would have been what they were communicating?
 15 A. I don't have any knowledge of that.
 16 Q. Okay. Was anyone else sending these
 17 emails in your office or was it all – you were kind
 18 of the distribution point?
 19 A. I was the distribution point.
 20 Q. For both the April 20th and the June 1st
 21 email?
 22 A. Yes.
 23 Q. Okay. Let me show you what was marked
 24 Exhibit 4 in yesterday's deposition with Dr.
 25 Shivers. It's kind of a long one but let's just

58

1 start at the top. What does the top of that email
 2 say?
 3 A. Are you talking about here?
 4 Q. Mm-hmm. On the first page.
 5 A. "Hi, Katrina. We encourage groups to get
 6 their governing documents submitted by" –
 7 Q. Let me interrupt you there. Sorry. I was
 8 unclear in my question.
 9 Does it show who it is from?
 10 A. Yes.
 11 Q. So is this email from you on June 13,
 12 2018, at 4:02 a.m.?
 13 A. Yes.
 14 Q. You were getting an early start that day.
 15 A. I was on vacation.
 16 Q. Oh, I'm sorry you got that interrupted.
 17 And you were communicating with Katrina
 18 Schrock?
 19 A. Yes.
 20 Q. And who is she?
 21 A. She, at the time, was the president, I
 22 believe, of InterVarsity Graduate Christian
 23 Fellowship.
 24 Q. To your knowledge is she still the
 25 president?

59

1 A. I don't know.
 2 Q. Okay. If I represented to you that she
 3 still is, you wouldn't have any reason to think
 4 that's wrong?
 5 A. I would not have any reason. No.
 6 Q. And then the other individuals that are
 7 copied on this email, do you know who they are in
 8 relationship to either the university or
 9 InterVarsity Graduate?
 10 A. Some of them, yes.
 11 Q. Is there anyone on there that you're not
 12 sure, you know, if they fit in one of those two
 13 categories?
 14 A. Yes. Michelle Tamplin, Shu Wan and
 15 Yoonwei Kim are the names I don't recognize.
 16 Q. And then in this email here it seems like
 17 you're dialoguing with Katrina just on this very
 18 first page that we're looking at –
 19 A. Mm-hmm.
 20 Q. -- about the specific deadline, whether it
 21 was going to be June 13th or June 15th.
 22 A. Correct.
 23 Q. Had there been some confusion on that
 24 point?
 25 A. I believe there was. We encouraged our

60

1 groups to submit by the 13th just so we had time to
 2 review all of them again and get back to them but
 3 the official deadline was the 15th.
 4 Q. In the email or the exhibit that we looked
 5 at just a minute ago from June 1st, what was the
 6 deadline on that one?
 7 A. June 15th.
 8 Q. Okay. And was there a communication in
 9 between that one and this one that you're aware of
 10 that said, hey, we really need you to do it on June
 11 13th if you can?
 12 A. I don't know.
 13 Q. Other than, and just to be clear, if you
 14 look at the last page of this one you'll see an
 15 email from -- or second to past page -- an email
 16 from Laurynn King that identifies June 13th where it
 17 says this is the deadline. But are you aware of any
 18 other emails beyond that one?
 19 A. I'm not aware of any other emails beyond
 20 this one, no.
 21 Q. Okay. Okay. Was there any other way that
 22 you're aware of that people in your office
 23 communicated with InterVarsity that they would like
 24 to get the constitution by June 13th?
 25 A. I'm not aware.

61

1 Q. Okay. And then on that last, or second to
 2 last page from Laurynn King she said, "We sent a few
 3 emails and also left a few voicemails over the past
 4 few months regarding the need to update the
 5 organization's governing documents."
 6 Are you aware of any time when people
 7 specifically from your office reached out to
 8 InterVarsity Graduate and left those emails or left
 9 those voicemails?
 10 A. I'm not aware.
 11 Q. All right. And your understanding from
 12 what we talked about a minute ago that as of June
 13 1st, InterVarsity was unaware of the need to update
 14 their constitution because they hadn't gotten that
 15 April 20th email?
 16 A. Yes, that's my understanding.
 17 Q. Okay. And so based on your knowledge
 18 there hadn't been any communication before June 1st
 19 to InterVarsity Graduate about updating their
 20 constitution?
 21 A. Yes.
 22 Q. Okay. So would this just be an error here
 23 in the email from Ms. King?
 24 A. Potentially an error or this was
 25 standardized messaging that was being used that

62

1 didn't necessarily apply to all of our groups.
 2 Q. Okay. So looking at, let's see, page
 3 three of the document, right at the top it says,
 4 "Katrina." It looks like the mail is from you. Is
 5 that correct?
 6 A. Yes.
 7 Q. And then in that email you say that you
 8 recognize the wish to have leadership requirements
 9 based on Christian beliefs but that InterVarsity
 10 Graduate's constitutional restriction on leadership
 11 related to religious beliefs is contradictory to the
 12 human rights clause?
 13 A. Yes.
 14 Q. Okay. On what did you -- were you
 15 referring to InterVarsity Graduate's religious
 16 leadership requirements in that email?
 17 A. Yes.
 18 Q. Was there anything else you were referring
 19 to?
 20 A. Not to my knowledge.
 21 Q. Okay. And when you had looked at their
 22 constitution, was there anything else that you
 23 identified that was noncompliant other than their
 24 requirement that their leaders be Christians?
 25 A. I don't recall.

63

1 Q. All right. And why did you state that
 2 requiring their leaders to be Christians would
 3 violate the human rights clause?
 4 A. Based on how we were operating, we were
 5 interpreting her human rights clause to say that
 6 there could be no -- no decisions from membership or
 7 leadership made on a protected class.
 8 Q. So that would include requiring your
 9 leaders to be Christian --
 10 A. Correct.
 11 Q. -- for a Christian student group?
 12 A. Yes.
 13 Q. Okay. And that wasn't just based on your
 14 own reading of the human rights clause; that was the
 15 university's position?
 16 A. Yes.
 17 Q. Okay. And that was, as of June 12th, what
 18 you said in your email to Katrina was consistent
 19 with the university's position?
 20 A. Yes.
 21 Q. All right. Why did you say that you kind
 22 of recognized the wish to have leadership
 23 requirements based on Christian beliefs?
 24 A. I wanted to let Katrina know that I
 25 understood where she was coming from and just show

64

1 that I was hearing her concern before explaining the
 2 university's position.
 3 Q. Do you think it's unreasonable for a
 4 Christian student group to want its leaders to share
 5 its beliefs?
 6 A. I don't think it's unreasonable.
 7 Q. Do you think it actually kind of can make
 8 sense in that you have those leaders are responsible
 9 for leading prayers and Bible studies and worship
 10 that it would make sense that they have a sincere
 11 belief in those religious activities?
 12 A. Yes.
 13 Q. All right. Did you send a similar email
 14 like this to any of those other groups that we just
 15 talked about earlier, like Love Works or
 16 Hawkapellas? Did you send an email like that to any
 17 of them?
 18 A. I don't recall.
 19 Q. Did you search your email box for any
 20 communications related to the enforcement of the
 21 human rights clause?
 22 A. In preparation for today?
 23 Q. Well, in giving -- in producing documents
 24 to your attorneys?
 25 A. Yes.

65

1 Q. Okay.
 2 A. Yeah.
 3 Q. And when you searched and then produced
 4 that, do you recall seeing any emails that you sent
 5 to Love Works?
 6 A. I don't recall.
 7 Q. Okay. And do you recall sending any
 8 emails to Hawkapellas?
 9 A. I don't recall.
 10 Q. Okay. So there weren't emails to
 11 Hawkapellas that said I recognize the wish to have
 12 an all-female a cappella group but we have to
 13 enforce our human rights clause?
 14 A. I don't recall.
 15 Q. All right. But you don't recall ever
 16 typing that email and sending it?
 17 A. Correct.
 18 Q. Okay.
 19 A. I do not recall typing an email and
 20 sending it.
 21 Q. Okay. Do you recall typing an email to
 22 Iowa Edge saying that restrictions based on race or
 23 ethnicity would violate the human rights clause?
 24 A. I don't.
 25 Q. Okay. And you don't recall sending an

66

1 email to the UI Veterans Association saying that
 2 restrictions on veterans status or military service?
 3 A. I don't.
 4 Q. Okay. And just to clarify, too, you
 5 weren't sending any emails to sport clubs regarding
 6 the human rights clause; that was all being handled
 7 in the Recreation Department?
 8 A. Correct.
 9 Q. Okay. And who was it over there who was
 10 handling that?
 11 A. At the time it was -- there were two
 12 coordinators for sport clubs, Lauren Hanna
 13 (phonetic) and Cary Budnick (phonetic).
 14 Q. Okay. Did you have any concerns with the
 15 idea of telling a Christian student group that they
 16 couldn't ask their leaders to share their faith
 17 without making the same requirement of groups that
 18 had expectations based on sex or race or veteran
 19 status?
 20 A. Can you repeat that?
 21 Q. Yeah, absolutely.
 22 So the email here says InterVarsity
 23 Graduate can't require its leaders to share its
 24 Christian faith.
 25 A. Right.

67

1 Q. But you didn't send a similar email to
 2 Love Works or to Hawkapellas. Do you have any
 3 concerns about enforcing the restriction one way on
 4 InterVarsity Graduate and not enforcing it the same
 5 way on those other groups?
 6 A. No.
 7 Q. And why not?
 8 A. Because I believe based on what we did in
 9 our review and how we interpreted our clause either
 10 those emails were sent and I don't recall them or
 11 there wasn't a need to do that.
 12 Q. Okay. Why wouldn't there have been a need
 13 to send an email to Hawkapellas and say you can't
 14 have an all-female a cappella group if that was, you
 15 know, under the human rights clause?
 16 A. I believe based on our review it was
 17 determined that the way their language read it
 18 wasn't contradictory language to the human rights
 19 clause.
 20 Q. And why wouldn't it be contradictory to
 21 say to be a part of our group you have to be a
 22 female?
 23 A. I don't recall that that's what it said.
 24 Q. Okay. Let me -- let's see if I can pull
 25 it up real quick and we'll just look at it together.

68

1 A. Okay.
 2 Q. Give me just one second.
 3 Okay. I need Document 27.
 4 And if we can mark this as Exh bit 13.
 5 So this would be, George, just to clarify,
 6 this will be starting our numbering after the 12
 7 that we ended at yesterday with Dr. Shivers.
 8 (WHEREUPON, Exh bit 13 was marked for
 9 identification.)
 10 BY MR. BLOMBERG:
 11 Q. So I'm showing you a document that's been
 12 marked Exhibit 13. It's the Constitution of the
 13 Iowa Hawkapellas.
 14 And if you look at Article 1 in the
 15 preamble.
 16 MR. CARROLL: Sorry. Can you tell us what
 17 the date of that constitution is?
 18 MR. BLOMBERG: Certainly. The document
 19 says September 2, 2008.
 20 BY MR. BLOMBERG:
 21 Q. And then Article 1, the preamble says,
 22 "The group's aim is to bring the sound of an all-
 23 female a cappella group to Iowa."
 24 Do you see that?
 25 A. Yes.

69

1 Q. Is there anything about that language that
 2 gives you concerns regarding the -- regarding the
 3 group's exclusion of people based on sex?
 4 A. No.
 5 Q. Why not?
 6 A. Because I believe that someone could still
 7 be a member of this group even though they may not
 8 be a woman. They could be someone who helps to
 9 coach the group or do their bookings who may not be
 10 female. The preamble reads to bring the sound of an
 11 all-female a cappella group, not necessarily that
 12 they have to be all female.
 13 Q. Okay. And so the males could participate
 14 in the group but they wouldn't be able to
 15 participate in every way?
 16 A. Correct.
 17 Q. So it's permissible under the university's
 18 human rights clause for discrimination on the basis
 19 of sex for certain types of activities?
 20 A. I don't know if that would be permissible.
 21 Q. But it wasn't -- it wasn't something that
 22 caused you to derecognize Hawkapellas?
 23 A. Correct. Correct.
 24 Q. Or communicate with them about that?
 25 A. Correct.

70

1 Q. Okay. Let me also show you a copy of the
 2 Love Works constitution, document 26.
 3 Would you please mark this Exhibit 14?
 4 THE REPORTER: Exh bit marked.
 5 MR. BLOMBERG: Thank you.
 6 (WHEREUPON, Exhibit 14 was marked for
 7 identification.)
 8 MR. CARROLL: Let's get these cleaned up a
 9 little bit.
 10 MR. BLOMBERG: Thank you. That's a good
 11 idea.
 12 BY MR. BLOMBERG:
 13 Q. Here you go.
 14 A. Thank you.
 15 Q. Do you recognize that document?
 16 A. Yes.
 17 Q. What document is it?
 18 A. This is the constitution of Love Works.
 19 Q. And can you identify anywhere on that
 20 document where it requires leaders to share the
 21 faith of the religious group? I think you're going
 22 to find it either at the bottom of the first page or
 23 the top of the second one. If you look at Article 3
 24 on the first page under Officers and Duties, the
 25 second sentence it says, "In order to be an

71

1 executive they must sign and agree to the mission
 2 statement and the statement of core beliefs of Love
 3 Works as outlined in Article 4."
 4 Do you see that language?
 5 A. Yes.
 6 Q. And if you turn to the next page, to
 7 Article 4, do you see the mission and core beliefs
 8 there?
 9 A. Yes.
 10 Q. Does that mission, the statement of core
 11 beliefs look like a statement of religious beliefs?
 12 A. Yes.
 13 Q. So did you send an email to Love Works
 14 telling them that they had to remove this language
 15 from their constitution?
 16 A. I don't recall.
 17 Q. Do you know if anyone else did?
 18 A. I don't know.
 19 Q. Did you review this constitution at any
 20 point?
 21 A. Yes.
 22 Q. When did you review it?
 23 A. Earlier this fall.
 24 Q. Would that be the November timeframe you
 25 were talking about?

72

1 A. Yes.
 2 Q. Okay. November 2018?
 3 A. Yes.
 4 Q. But you don't recall reviewing it before
 5 then?
 6 A. I don't recall reviewing it before then,
 7 no.
 8 Q. Okay. Is there any reason why Love Works
 9 would not have gotten an email saying that they
 10 needed to change their constitution that you're
 11 aware of?
 12 A. I don't know.
 13 Q. Would it give you concern that Love Works
 14 didn't receive an email like that when InterVarsity
 15 Graduate did in light of the court's ruling about
 16 selective enforcement?
 17 A. I don't know.
 18 Q. Okay. Do you think that it would raise
 19 problems under the First Amendment if the university
 20 was enforcing its human rights clause in a way that
 21 was not evenhanded?
 22 A. I'm sorry, can you say that again?
 23 Q. Absolutely.
 24 Do you think that it would cause concerns
 25 under the First Amendment if the university was

73

1 enforcing its policy in a way that was not
 2 evenhanded?
 3 A. Yes.
 4 MR. BLOMBERG: Do you need a break?
 5 MR. CARROLL: Yeah.
 6 MR. BLOMBERG: Absolutely, please. Go off
 7 the record.
 8 (WHEREUPON, a brief recess was taken.)
 9 THE REPORTER: We are on the record.
 10 BY MR. BLOMBERG:
 11 Q. So if I can show you another exhibit.
 12 Let's mark this Exh bit 15.
 13 THE REPORTER: Exhibit 15 is marked.
 14 (WHEREUPON, Exh bit 15 was marked for
 15 identification.)
 16 BY MR. BLOMBERG:
 17 Q. If you look at the top there it's an email
 18 from June 12, 1:07 p.m. And it looks to be from you
 19 to Katrina. Does that look right?
 20 A. Yes.
 21 Q. And it says that you were -- discussed
 22 with your university attorney to make sure they're
 23 on board regarding Ms. Schrock's proposal to
 24 potentially changing the constitution language to
 25 strongly encourage to subscribe or something like

74

1 that.

2 A. Mm-hmm.

3 Q. Do you recall that email?

4 A. Yes.

5 Q. Okay. And then if you go back to Exhibit

6 4, it's a document you looked at earlier. It's the

7 other email trail. It looks a lot like this one.

8 There you go. And then go back the next page. I

9 think you say there that you just received word that

10 we would not approve the change in language that Ms.

11 Schrock proposed.

12 Does that look correct to you?

13 A. Yes.

14 Q. So then on -- during your June 12th

15 discussion with Ms. Schrock, you informed her that

16 the university's position was that they couldn't ask

17 their leaders to be Christian, and so she proposed,

18 well, what if we strongly encourage? She said, I'll

19 have to check with my other leaders, but would that

20 be a possibility? You said you would contact the

21 university attorney about that. And then you said

22 that you received word back that that was not going

23 to be permissible.

24 Without telling me the substance of what

25 was communicated, who informed you that strongly

76

1 A. Not that I recall.

2 Q. Okay. If the Women in Science and

3 Engineering had language in their constitution that

4 encouraged their members to be women, would that

5 concern you at all?

6 A. Yes.

7 Q. Why would it concern you?

8 A. Because given the direction here that is

9 something that shouldn't be allowed.

10 Q. Your first email, the June 1 email,

11 mentioned an FAQ document, I think.

12 A. Mm-hmm.

13 Q. Do you recall that?

14 A. Yeah.

15 Q. Do you know who drafted that document?

16 A. I did.

17 Q. Okay. And what was the process for

18 reviewing a constitution that was submitted in

19 response to your June 1st email? Did they come to

20 you and then you reviewed it, or how did it work?

21 A. Each staff member who was helping with

22 this compliance effort was given a set of

23 organizations to reach out to and to get

24 constitutions from, and it was then their job to

25 review those and provide feedback to the

75

1 encouraged was not permissible.

2 A. General counsel.

3 Q. Okay. And how did they inform you? Was

4 it via email or was it on the phone?

5 A. I don't recall.

6 Q. Okay. Did you have -- was it just one

7 communication on this issue or were there several

8 communications on it?

9 A. I don't recall.

10 Q. Okay. Did you make any suggestions

11 regarding whether this alternative or a different

12 alternative might work? Or you just kind of run it

13 up the chain and ask what the university's position

14 was?

15 A. I ran it up the chain and asked the

16 university's position.

17 Q. Okay. And your email that said you were

18 going to check with the university attorney, that

19 was sent at about 1:07 p.m.?

20 A. Yes.

21 Q. Okay. And then your email responding back

22 was at about 4:05 p.m.?

23 A. Yes.

24 Q. Did you send a similar email to other

25 groups like the Women in Science and Engineering?

77

1 organization whether they would be approved or not.

2 Q. Okay. So the June 1st emails that went

3 out, those all went out through you?

4 A. Yes.

5 Q. But the April 20th emails that went out,

6 they went out through different folks?

7 A. No, they went out through me.

8 Q. Okay.

9 A. I apologize. I maybe wasn't clear. The

10 June 1st emails were sent. Phone calls were also

11 made to organizations, and some staff may have

12 decided to send personal emails to those

13 organizations that they were given to say this was

14 what needed to happen.

15 Q. Okay. And then for people to comply, they

16 would go and upload it to that OrgSync site that you

17 had in your June 1st email?

18 A. That was an option or they could email it

19 directly in to staff.

20 Q. Okay. And then when they, either way, did

21 that come back to you and then you reviewed it? Or

22 did it come back to like a general box? How -- what

23 did that look like?

24 A. Some of them came back directly to me,

25 especially the groups that I was directly working

78

1 with. Some came back to our other staff in their
 2 individual inboxes, and others came to a shared
 3 email account that we have for our office.
 4 Q. And so all those groups that we talked
 5 about earlier, the Women in Science and Engineering,
 6 Love Works and all those groups, if you had emailed
 7 them that would be in your sent box –
 8 A. Yes.
 9 Q. – for the April 20th or the June 1st?
 10 A. Yes.
 11 Q. And if they had emailed back it would be
 12 in your inbox?
 13 A. Yes.
 14 Q. And when you did – when did you do the
 15 review of all of your emails to see what you needed
 16 to produce to your counsel?
 17 A. I believe in August.
 18 Q. August of last year?
 19 A. Yes, August of '18.
 20 Q. Okay. And then have you looked at your
 21 emails again since that time?
 22 A. Yes.
 23 Q. To produce anything to counsel?
 24 A. No.
 25 Q. Have you looked – so there haven't been

79

1 any other communications since that time that you've
 2 reviewed and turned over to counsel to produce?
 3 A. Not that I'm aware of, no.
 4 Q. Are you aware that the InterVarsity
 5 plaintiffs have made a discovery request for
 6 documents that would be related to this litigation?
 7 A. Yes.
 8 Q. And have you looked in your email to
 9 determine if there would be any documents related to
 10 this litigation?
 11 A. Yes.
 12 Q. And that request was made about a month –
 13 two or three weeks ago?
 14 A. Yes.
 15 Q. Okay. So you've looked in your email in
 16 the last two or three weeks to look for
 17 communications that would be related to this?
 18 A. Yes.
 19 Q. All right. And you didn't see any emails
 20 in there to Love Works?
 21 A. Not that I recall.
 22 Q. Okay. And you didn't see any responsive
 23 emails from Love Works in those emails that you
 24 reviewed?
 25 A. Not that I recall.

80

1 Q. Okay. So you would have sent them
 2 initially April, June 2018.
 3 A. Yes.
 4 Q. You would have looked again in August
 5 2018?
 6 A. Yes.
 7 Q. And you would have looked again about two
 8 or three weeks ago?
 9 A. Yes.
 10 Q. And then based on those four – four
 11 different experiences, you don't have a recollection
 12 of sending any of those emails to Love Works or
 13 Hawkapellas or –
 14 A. I don't.
 15 Q. Okay. Did all the registered student
 16 organizations that submitted constitutions either
 17 get confirmation that their constitution was
 18 accepted or feedback about what they needed to
 19 change?
 20 A. I don't know if they all did. We did our
 21 best to provide that to them, but with that many
 22 groups I can't say that they all did for sure.
 23 Q. Did the FAQs say that they were going to?
 24 That if you submit it and it's approved, then you'll
 25 get confirmation, and if you submit it and there's a

81

1 problem, we'll let you know so you have a chance to
 2 fix it?
 3 A. I don't remember.
 4 Q. All right. Let's look at Document 20 real
 5 quick.
 6 What are we on now? Are we on Exh bit 16,
 7 I think?
 8 THE REPORTER: Exhibit 16 is marked.
 9 MR. BLOMBERG: Thank you.
 10 (WHEREUPON, Exh bit 16 was marked for
 11 identification.)
 12 BY MR. BLOMBERG:
 13 Q. So does this look like the FAQ document
 14 that we were just talking about?
 15 A. Yes.
 16 Q. Okay. And then on the second page when it
 17 says – there's a question that says, "Will I get
 18 feedback on my constitution?" The answer is, "Yes.
 19 The Center for Student Involvement and Leadership
 20 will be reviewing RSO governing documents and
 21 provide feedback if your constitution is not
 22 correct."
 23 Is that correct?
 24 A. Yes.
 25 Q. All right. So would an organization who

82

1 had received instruction that their constitution
2 needed changing generally, according to this policy,
3 have received an email from your office on that?
4 A. Yes.
5 Q. All right. Would that have come from you
6 or did it have come from others members in your
7 office as well?
8 A. It could have come from other members in
9 our office.
10 Q. Okay. And you're not aware of any email
11 like that, an email that says here's some feedback
12 on corrections you need to make for Hawkapellas or
13 Spectrum UI or Love Works?
14 A. I'm not aware.
15 Q. Okay. The June 13th or June 12th email
16 with Kristina Schrock when she was kind of initially
17 dialoguing about the constitution, she mentioned
18 that they thought they had submitted their
19 constitution on June 2nd. Did it just never make it
20 into your files or they just, for whatever reason,
21 it wasn't – no one ever saw it?
22 A. I remember getting – seeing the email
23 from Karina. I don't remember what the mix up was,
24 whether we got it or if it was put in a different
25 place than we were expecting or what.

83

1 Q. Okay. But you never saw the June 2nd
2 email or communication of some kind with the updated
3 constitution?
4 A. That's correct.
5 Q. And you're not aware of anybody else who
6 did?
7 A. That's correct.
8 Q. On June 28, 2018, so last summer, the
9 Federal District Court renewed its preliminary
10 injunction, extended it. Were you aware of that
11 ruling?
12 A. Yes.
13 Q. All right. What was your – what was your
14 understanding of what the court ruled?
15 A. My understanding was that the injunction
16 was extended. And so what was mandated of us by the
17 court to not deregister BLinC was continuing on
18 through the – I think until the case had gone to
19 trial and had been finalized.
20 Q. And was the court's ruling based on the
21 same kinds of selective enforcement concerns that it
22 had identified earlier in the January ruling?
23 A. I don't know.
24 Q. Okay. Did you review the ruling?
25 A. I don't remember.

84

1 Q. You don't recall having reviewed it?
2 A. I don't recall having reviewed it.
3 Q. Were you aware of anybody else in your
4 office who had?
5 A. I'm not aware, no.
6 Q. Was there any training that was performed
7 about the application of the ruling to your review
8 process?
9 A. No.
10 Q. And any training about the application of
11 the ruling to register student organizations
12 generally?
13 A. Not that I can remember.
14 Q. Was it your understanding at that point
15 that the university was not allowed to selectively
16 enforce the human rights clause against a religious
17 student group?
18 A. Can you repeat that?
19 Q. Absolutely.
20 Was it your understanding at that point
21 that the university was not allowed to selectively
22 enforce the human rights clause against a religious
23 student group?
24 A. I don't know.
25 Q. You thought – you think it could be okay

85

1 at that point for a religious student group to
2 receive unequal enforcement?
3 A. I was not – not being a legal expert I
4 didn't know what the ruling allowed us to –
5 Q. I'm not asking you to tell me what the
6 ruling means as a matter of law. I'm just asking
7 about your understanding.
8 A. Okay.
9 Q. So your understanding at that point, was
10 it okay for you to treat religious student groups
11 different than other types of groups?
12 A. No, it was not okay.
13 Q. Okay. Okay.
14 Sometime between June 15th and July 20th,
15 the university deregistered InterVarsity Graduate.
16 A. Correct.
17 Q. Do you know the exact date when that
18 decision was made?
19 A. I don't.
20 Q. Do you have a rough estimate?
21 A. I believe it was around June 18th.
22 Q. Around June 18th? And do you know what
23 the basis for the decision was?
24 A. Yeah. Failing to submit what were deemed
25 compliant governing documents.

86

1 Q. And what was out of compliance about the
 2 constitution they had submitted to you?
 3 A. The leadership requirements of being
 4 required – I don't remember if it was Christian or
 5 –
 6 Q. So the thing that was out of compliance
 7 about InterVarsity Graduate's constitution was that
 8 they required their leaders to be Christians?
 9 A. I don't – I believe that's what it was.
 10 I don't remember the exact language that was used
 11 but it was relating to the emails back and forth
 12 with Katrina.
 13 Q. So it was consistent with the conversation
 14 you had with Katrina via those emails?
 15 A. Yes.
 16 Q. Okay. It wasn't anything else beyond what
 17 was discussed in those emails?
 18 A. No.
 19 Q. Okay. Do you know who was involved in the
 20 decision besides yourself?
 21 A. No.
 22 Q. All right. Did you have any input into
 23 the decision?
 24 A. No.
 25 Q. So you just reported that InterVarsity

87

1 Graduate hadn't complied and someone else decided to
 2 derecognize them?
 3 A. It was – based on how we were operating,
 4 if we didn't have compliant documents we were going
 5 to deregister them. So there was no one saying, I
 6 guess, after we had done this compliance review,
 7 okay, now go deregister them. It was just assume
 8 that because they didn't they would be deregistered.
 9 Q. Okay. Did you reject to the
 10 deregistration of InterVarsity Graduate?
 11 A. No.
 12 Q. Okay. Do you know if Dr. Nelson was aware
 13 of the decision?
 14 A. I don't know if he was aware.
 15 Q. Do you know if Dr. Shivers was?
 16 A. I don't know.
 17 Q. All right. And you don't know that they
 18 weren't aware either though?
 19 A. Correct.
 20 Q. Okay. And do you know if President
 21 Harreld or any member of the Board of Regents were
 22 aware?
 23 A. I don't know.
 24 Q. All right. Was the decision to deregister
 25 InterVarsity Graduate consistent with your

88

1 understanding of what the human rights clause
 2 required at that time?
 3 A. Yes.
 4 Q. Let me show you Exh bits 6 and 7 from
 5 yesterday's deposition with Dr. Shivers.
 6 Just take a second to review those and let
 7 me know when you're ready to talk.
 8 A. Okay.
 9 Q. Do you recognize the document Exhibit 6?
 10 A. Yes.
 11 Q. Were you copied on that email?
 12 A. Yes.
 13 Q. What's the date on that email?
 14 A. June 18, 2018.
 15 Q. So would this be about the timeframe when
 16 the decision to deregister was made?
 17 A. Yes.
 18 Q. All right. And then do you see – is this
 19 a list of noncompliant organizations?
 20 A. Yes.
 21 Q. All right. Were all of these
 22 organizations deregistered?
 23 A. I believe so, yes.
 24 Q. If you look at document – Exhibit 7, it
 25 looks like 38 of those groups were placed on defunct

89

1 status but not all of them. Do you have any reason
 2 – do you have any reason to think, or do you know
 3 why not all of the groups were placed on defunct
 4 status?
 5 A. I believe it was because some were being
 6 reviewed by the general counsel's office, and while
 7 they were doing that review we weren't going to
 8 deregister them.
 9 Q. Okay. So the groups that were listed on
 10 Exhibit 7, those were all where the review was
 11 complete and they were derecognized or deregistered?
 12 A. Yeah.
 13 Q. All right. And then any group that wasn't
 14 on – in Exhibit 7 but was on Exhibit 6 were ones
 15 that were determined to be noncompliant and were
 16 being reviewed by the general counsel?
 17 A. I believe so.
 18 Q. On this list of noncompliant
 19 constitutions, do you see Love Works?
 20 A. I'm sorry, which list?
 21 Q. Exhibit 6.
 22 A. Exhibit 6.
 23 Q. Yeah, the larger list.
 24 A. I do not.
 25 Q. And if I were to say that Hawkapellas and

90

1 Iowa Edge and Spectrum UI and Caribbean Student
 2 Association and Women in Science and Engineering and
 3 UI Veterans Association Intersection weren't on that
 4 list, do you have any reason to think that's
 5 inaccurate? I'm happy to walk through that list
 6 again, too.
 7 A. Could you reread those organizations?
 8 Q. Yeah, absolutely.
 9 MR. CARROLL: Do you have copies of
 10 Exhibit 6 and 7 that you can share with counsel?
 11 MR. BLOMBERG: Certainly. Happy to. I
 12 think they're in there.
 13 MR. CARROLL: Just so we can follow along
 14 with you guys.
 15 MR. BLOMBERG: Definitely.
 16 BY MR. BLOMBERG:
 17 Q. So Hawkapellas. Do you see Hawkapellas on
 18 the noncompliant list? And that's the one we're
 19 talking about right now.
 20 A. Yes.
 21 Q. Where is it?
 22 A. It is towards the middle of the page.
 23 MR. CARROLL: It's just below your middle
 24 punch.
 25 THE WITNESS: I see it.

91

1 BY MR. BLOMBERG:
 2 Q. And then is Hawkapellas on the group that
 3 was put on the defunct list?
 4 A. From Exhibit 7?
 5 Q. Mm-hmm. Exhibit 7.
 6 A. No, it is not.
 7 Q. Okay. Do you know what the text on the
 8 pages of the website, the OrgSync pages was for
 9 groups that were listed as defunct?
 10 A. I don't.
 11 Q. Do you know who chose the text on those
 12 defunct pages?
 13 A. I don't.
 14 Q. If InterVarsity Graduate said that the
 15 text on the pages said that that group was defunct
 16 and that they had "requested to be deregistered
 17 based on lack of interest from students," would you
 18 have any reason to think that InterVarsity was
 19 incorrect?
 20 A. Can you rephrase that?
 21 Q. When InterVarsity went to their webpage
 22 and they saw that language --
 23 A. Yeah.
 24 Q. -- do you have any reason to think they
 25 were incorrect when they saw that language?

92

1 A. That that language was incorrect?
 2 Q. That they were -- their reading of it was
 3 incorrect?
 4 A. Oh, yes. Or, I'm sorry, I don't think I -
 5 -
 6 Q. Yeah, no, we'll walk through it.
 7 So you don't know who was putting up the
 8 language about what -- on these defunct pages?
 9 A. I don't recall who did.
 10 Q. Okay. And you don't know who chose what
 11 language was going up?
 12 A. I don't.
 13 Q. Was it just kind of standard language that
 14 was being put up on every page so all the pages were
 15 kind of stamped defunct, students aren't interested?
 16 A. Typically, that's how it's done.
 17 Q. Okay. Do you think that could have been
 18 harmful for a student group if they were being -- if
 19 people were looking at their page and saying, oh,
 20 this group has been deregistered because nobody
 21 wants to come anymore?
 22 A. Yes.
 23 Q. All right. Do you think that would have
 24 harmed a group like that's ability to attract new
 25 students?

93

1 A. Yes.
 2 Q. All right. InterVarsity Graduate had been
 3 at the university for 25 years and had selected its
 4 leaders based on faith throughout that time and it
 5 was deregistered in 2018 for the same, you know, for
 6 continuing to want to do that. What harm would have
 7 been caused by InterVarsity Graduate continuing to
 8 select its leaders based on its faith?
 9 A. I think the harm would be to someone who
 10 wants to be a leader of the organization who doesn't
 11 subscribe to all the specific beliefs of the
 12 organization.
 13 Q. And how would they be harmed?
 14 A. By not being allowed to be a part of it.
 15 Q. Be a part of it or be a leader?
 16 A. Be a leader.
 17 Q. And how do you quantify that harm?
 18 A. I don't know that you can.
 19 Q. Was there a discussion in your office
 20 about quantifying that harm?
 21 A. Not that I'm aware of.
 22 Q. How many leadership positions does
 23 InterVarsity Graduate have?
 24 A. I don't know.
 25 Q. If I told you it was four or five, would

94

1 you have a reason to think that incorrect?
 2 A. No.
 3 Q. Okay. How many fraternity or sorority
 4 positions are there at the university?
 5 A. I don't know.
 6 Q. Do you know about how many people pledge
 7 at the university?
 8 A. I don't.
 9 Q. If the university had a published number
 10 that says about 17 percent of the undergraduate
 11 body, would you have any reason to think that was
 12 incorrect?
 13 A. No.
 14 Q. For each one of those positions people
 15 were excluded based on their sex; correct?
 16 A. Yes.
 17 Q. So 17 percent of the student body was
 18 excluded from being -- or 17 percent of the initial
 19 positions, thousands of positions had an
 20 exclusionary criteria based on sex to participate in
 21 a fraternity or sorority; correct?
 22 A. Yes.
 23 Q. Do you think the magnitude of the harm
 24 that you identified a second ago about being
 25 excluded would be a lot greater for a fraternity or

95

1 sorority than for the four or five leadership
 2 positions in InterVarsity Graduate?
 3 A. I don't know.
 4 Q. If there are several thousand positions
 5 that people can't participate in for a fraternity or
 6 sorority as opposed to four or five that they can't
 7 participate in in InterVarsity Graduate, does that
 8 seem like a significant difference in the magnitude
 9 of the harm?
 10 A. Potentially, yes.
 11 Q. And for -- are you aware that InterVarsity
 12 Graduate allows everyone to be a member?
 13 A. Yes.
 14 Q. So the only restriction is placed on those
 15 four to five leadership positions?
 16 A. Yes.
 17 Q. Okay. Whereas for all of those Greek
 18 groups it was not just leadership but it was also
 19 membership?
 20 A. Yes.
 21 Q. All right. So you absolutely couldn't be
 22 a member of any of those positions based on your sex
 23 for thousands and thousands of positions?
 24 A. Yes.
 25 Q. All right. Does that seem like a

96

1 significant difference in harm?
 2 A. Potentially, yes.
 3 Q. Is there any reason why it wouldn't be a
 4 significant difference in harm?
 5 A. Can you repeat the question?
 6 Q. Mm-hmm. Is there any reason why -- let me
 7 step back for a second.
 8 You said, you know, a student might feel
 9 excluded because they couldn't be a leader for
 10 InterVarsity Graduate. So that sense of student
 11 exclusion, that would create a harm?
 12 A. Mm-hmm.
 13 Q. If there are thousands of positions, not
 14 just for leadership but also for membership --
 15 A. Yeah.
 16 Q. -- that students are excluded from based
 17 on their sex, do you think -- is there any reason to
 18 think that would be less of an exclusion, less of a
 19 harm than the InterVarsity Graduate issue?
 20 A. Yes.
 21 Q. Why?
 22 A. Because there are both opportunities for
 23 both genders in that exclusion for fraternities and
 24 sororities.
 25 Q. So did the university consider the

97

1 alternative of saying, well, if InterVarsity
 2 Graduate is going to have Christian leadership
 3 requirements, we need to make sure there are other
 4 groups on campus that will have other faith-specific
 5 requirements? Did the university try to balance
 6 that type of harm?
 7 A. I don't know.
 8 Q. Were you aware of that?
 9 A. I was not aware of that.
 10 Q. Did you ever look at that question
 11 yourself?
 12 A. No.
 13 Q. Would they -- what we were just talking
 14 about here about, you know, well, at least there's
 15 fraternities and sororities, was that a calculation
 16 that you made in your office?
 17 A. Can you repeat that?
 18 Q. Mm-hmm. So you just said, well, maybe the
 19 harm is not quite so bad because there are both
 20 fraternities and sororities. Did that kind of
 21 calculation happen when you were making the decision
 22 to deregister InterVarsity Graduate?
 23 A. No.
 24 Q. Were you aware of anybody who was looking
 25 at that data and trying to balance it?

98

1 A. I'm not aware.

2 Q. Were there ever any written documents that

3 were created and said, well, here's the kind of

4 harms that we're trying to minimize and let's

5 balance it out carefully?

6 A. Not to my knowledge.

7 Q. Okay. You didn't ever look at anything

8 like that?

9 A. No.

10 Q. Okay. The -- since August, InterVarsity

11 Graduate has been reregistered. Have you noticed

12 any harms that have been caused by allowing

13 InterVarsity Graduate to continue to select leaders

14 based on its faith?

15 A. No.

16 Q. In the 25 years prior to InterVarsity

17 being deregistered, had any student ever actually

18 come and said this is a big problem for me that I

19 can't be a leader at InterVarsity Graduate?

20 A. Not that I'm aware of.

21 Q. You're not aware of any complaints that

22 have been filed against InterVarsity Graduate?

23 A. I'm not aware of any complaints; no.

24 Q. Are you aware of the registered student

25 organization policies at Iowa State and Northern

99

1 Iowa?

2 A. No.

3 Q. If Dr. Shivers had looked at those -- Iowa

4 State's policies, would you have any awareness of

5 that?

6 A. Yes.

7 Q. All right. And so if Dr. Shivers

8 testified yesterday that she had looked at Iowa

9 State's policies, would you have been aware of that

10 as well?

11 A. Yes.

12 Q. All right. So do you -- thinking about it

13 now, do you recall that maybe she looked at Iowa

14 State's policies?

15 A. Yes.

16 Q. Okay. Do you recall what Iowa State's

17 policies is -- are as they relate to student

18 leadership selection?

19 A. Yes.

20 Q. And what is that policy?

21 A. They have a -- they have a carve-out for

22 leaders based on strongly held beliefs. I'm sorry,

23 I don't know the exact terminology but something

24 related.

25 Q. So would that mean that InterVarsity

100

1 Graduate at Iowa State would have been permitted,

2 whereas here it was deregistered?

3 A. I believe so; yes.

4 Q. Okay. Are you aware of any harms that are

5 happening at Iowa State for allowing InterVarsity

6 Graduate to continue functioning over there?

7 A. I -- oh, sorry.

8 Q. That's fine.

9 A. I'm not aware.

10 Q. Okay. Are you aware of any attempt to

11 study at Iowa State and determine if their system

12 was causing significant harm to the student

13 population?

14 A. Am I aware of any studies?

15 Q. Mm-hmm.

16 A. No.

17 Q. Or any attempt by the university to try to

18 gather information about what was happening at Iowa

19 State?

20 A. I'm aware that the university looked at

21 Iowa State's policies but I'm not aware of any

22 studies that they were looking at as far as harm.

23 Q. Okay. And did -- was there -- to your

24 knowledge was there a decision that said, well,

25 we're not going to follow the Iowa State route

101

1 because it's producing some unacceptable outcomes?

2 A. I don't know.

3 Q. Okay. You're not aware of anything like

4 that?

5 A. I know there was a decision made to not

6 follow the Iowa State policy. I don't know why that

7 decision was made.

8 Q. Okay. Do you know anything about Northern

9 Iowa's registered student organization policy?

10 A. I don't.

11 Q. If InterVarsity Graduate was permitted to

12 be at Northern Iowa, you know, would you have any

13 reason to think that was incorrect?

14 A. No.

15 Q. Okay. Does the University of Iowa have

16 specific interests here that are different from the

17 kind of interests that Iowa State or Northern Iowa

18 would have?

19 A. I don't know.

20 Q. There's not any ones that you're aware of

21 sitting here today?

22 A. Correct.

23 Q. Okay. And you've not been a part of any

24 discussions that said we have a different interest,

25 they're different from us because of X, Y, or Z?

102

1 A. Correct.

2 Q. Okay. And those campuses are subject to

3 the same Iowa laws and federal laws that University

4 of Iowa is?

5 A. I would assume so.

6 Q. Are you aware of any attempt to fashion an

7 alternative to deregistering InterVarsity entirely

8 for its religious leadership requirements?

9 A. Can you – I'm sorry, can you repeat that?

10 Q. So it was basically like a binary choice;

11 right?

12 A. Mm-hmm.

13 Q. Either change your constitution or move

14 the religious leadership requirements or you're

15 deregistered?

16 A. Mm-hmm.

17 Q. Was there any attempt to look at

18 alternatives for, you know, maybe not entirely being

19 deregistered, maybe change the types of benefits

20 you're elig ble to access? Are you aware of any

21 sort of calculation along those lines?

22 A. Not that I recall; no.

23 Q. Was there a decision that the university

24 was going to adopt a single policy, kind of a single

25 bright line that applied to all student groups?

103

1 A. I'm sorry, can you repeat that again?

2 Q. Was there a decision by the university to

3 have a single rule that applied to all student

4 groups?

5 A. I believe so; yes.

6 Q. Okay. So was there any sort of

7 particularized investigation of InterVarsity

8 Graduate's situation where they came and said, hey,

9 this is really important to us because we're a

10 Christian group where you said, oh, well, let's

11 think about that. Let's see if there is a way we

12 can accommodate that? Was that kind of discussion

13 held?

14 A. No.

15 Q. Okay. Was there any evidence specific to

16 InterVarsity Graduate where the university said,

17 now, we can't give you an exemption or accommodation

18 because it will harm our interests?

19 A. No.

20 Q. Looking back at Document 7, which has that

21 list of all the organizations that were listed as

22 defunct, do you know if Love Works had their

23 constitution listed as defunct in the summer of

24 2018?

25 Let me ask the question differently.

104

1 If an organization was going to have their

2 website listed as defunct in the summer of 2018,

3 would they be on this list?

4 A. I believe so; yes.

5 Q. So Love Works wasn't on that list. They

6 weren't on the other list. They weren't

7 deregistered in summer of 2018. What was it about

8 Love Works' leadership requirements that we looked

9 at earlier that were different from InterVarsity

10 Graduates'?

11 A. I don't know.

12 Q. Is there any reason that you can think of

13 today why Love Works should have remained registered

14 and InterVarsity Graduate been kicked off campus?

15 Or deregistered; sorry.

16 Let me ask that question again.

17 Was there any reason that you're aware of

18 as you sit here today why Love Works should have

19 remained registered and InterVarsity Graduate been

20 deregistered?

21 A. No.

22 Q. As you sit here today and look at that

23 information, and in light of the January 23rd court

24 order and the June 28th court order, does it concern

25 you that two different religious groups were treated

105

1 differently under the human rights clause?

2 A. Yes.

3 Q. Does it concern you that that might have

4 violated the First Amendment?

5 A. Yes.

6 Q. Deregistration would have had some

7 important implications for a lot of these student

8 groups, wouldn't it?

9 A. Yes.

10 Q. It would have impacted their ability to

11 reserve space and to communicate to students?

12 A. Yes.

13 Q. Would it make it harder for them to be

14 healthy student groups?

15 A. Yes.

16 Q. Would it make it harder for them to

17 recruit students?

18 A. Yes.

19 Q. And would it make it harder even over the

20 course of the summer?

21 A. Yes.

22 Q. Let me show you what we marked yesterday

23 as Document 8, or Exhibit 8, rather.

24 It's the same document.

25 MR. CARROLL: What was the number?

106

1 MR. BLOMBERG: It's – that's the right
 2 one, 81-1.
 3 MR. CARROLL: Okay.
 4 MR. BLOMBERG: Yeah, I switched them all
 5 up so they're all in the right place.
 6 BY MR. BLOMBERG:
 7 Q. If you could look at pages 17 and 18 of
 8 this document. Or actually, before you do that, do
 9 you see the top of the page where it says, in that
 10 caption right there it says, "Defendant's
 11 resistance"?
 12 A. Yes.
 13 Q. And then if you look at the last page, do
 14 you see how it's signed by the Attorney General's
 15 Office?
 16 A. Yes.
 17 Q. All right. So is this a document filed by
 18 the university in defense to the Business Leaders in
 19 Christ lawsuit?
 20 You can look at that front page.
 21 A. This is – oh, okay. I'm sorry. I
 22 believe so, yes.
 23 Q. Okay. Can you look at pages 17 and 18 of
 24 this document, please? If you look at the top of
 25 page 17, do you see the bottom of that first

107

1 paragraph right there where it says, "But has
 2 allowed some exceptions for compelling reasons which
 3 support the educational and social purposes of the
 4 form"?
 5 A. Mm-hmm.
 6 Q. So are you aware that the university
 7 granted some exemptions from its human rights clause
 8 for student organizations?
 9 A. Yes.
 10 Q. Do you know what groups that it exempted?
 11 A. Fraternities and sororities.
 12 Q. Any other ones?
 13 A. Not that I would have knowledge of.
 14 Q. Okay. Turning to the next page, if you
 15 look about halfway down that first full paragraph it
 16 says, "These groups have been permitted to continue
 17 to exist as RSOs in spite of their apparent
 18 violations of the policy for a variety of reasons,
 19 including administrative oversight by the
 20 university, but also for reasons which support the
 21 university's educational mission. For example,
 22 multiple groups provide safe spaces for minorities,
 23 which have historically been victims of
 24 discrimination."
 25 Do you know which multiple groups the

108

1 university is referring to there that provide safe
 2 spaces for minorities?
 3 A. I don't.
 4 Q. Was that ever factored into your review of
 5 the constitutions?
 6 A. No.
 7 Q. All right. Let me show you, let's see.
 8 What exhibit? Are we on Exhibit 17?
 9 THE REPORTER: Exhibit 17.
 10 MR. BLOMBERG: Can you mark this Exhibit
 11 17?
 12 THE REPORTER: Exhibit 17 is marked.
 13 (WHEREUPON, Exh bit 17 was marked for
 14 identification.)
 15 MR. BLOMBERG: Here, George.
 16 BY MR. BLOMBERG:
 17 Q. Let me show you a document that's been
 18 marked Exhibit 17. It's the – as you see, it's the
 19 Business Leaders in Christ litigation versus the
 20 University of Iowa. And it says Defendants Reply.
 21 Do you see that in the caption?
 22 A. Yes.
 23 Q. If you look on the last page, do you see
 24 again how it's signed by the attorney general?
 25 A. Yes.

109

1 Q. Okay. If you turn to the second page, can
 2 you read that second paragraph there? You don't
 3 have to read it out loud. Just read it to yourself.
 4 A. Okay.
 5 Okay.
 6 Q. Do you see how at the bottom of the page
 7 it has a quote from the Love Works constitution that
 8 has those same core beliefs that we were looking at
 9 earlier in the Love Works constitution?
 10 A. Yes.
 11 Q. And do you see how the paragraph here
 12 seems to indicate that Love Works is one of the
 13 groups that are providing safe spaces for
 14 minorities?
 15 A. Yes.
 16 Q. And it says, "Love Works' constitution
 17 does not exclude any members of a protected class"?
 18 A. Yes.
 19 Q. All right. So does the university's
 20 position then articulate it here that Love Works'
 21 statement of faith was permissible?
 22 A. Yes.
 23 Q. And that's because it was a safe space for
 24 minorities?
 25 A. Yes.

110

1 Q. Okay. Is that your understanding of the
 2 university's position at this time?
 3 A. Yes.
 4 Q. If you look at the next page, please. Do
 5 you see the paragraph there at the top of the page
 6 where it's talking about House of Lord?
 7 A. Yes.
 8 Q. Does this also look like the university is
 9 identifying House of Lord as a group that provides
 10 safe spaces for minorities?
 11 A. Yes.
 12 Q. So when the university says that it
 13 provides exceptions from its human rights clause for
 14 groups that provide safe spaces for minorities, at
 15 least Love Works and House of Lord would be included
 16 among those?
 17 A. Yes.
 18 Q. Okay. Do you think it would have impaired
 19 the safe space provided by those groups if they had
 20 been required to select leaders that disagreed with
 21 their mission?
 22 A. Yes.
 23 Q. So, for instance, if Love Works had been
 24 required to accept leaders who disagreed with their
 25 beliefs as they regard their religious beliefs, as

112

1 space?
 2 A. Yes.
 3 Q. So the university permitted these
 4 exemptions from the human rights clause for purposes
 5 of allowing those safe spaces?
 6 A. I don't know. I mean, based on what I'm
 7 seeing here, yes.
 8 Q. Okay. And you're the university's
 9 designated witness on enforcement of the human
 10 rights clause in the derecognition of registered
 11 student organizations; correct?
 12 A. Can you repeat that?
 13 Q. Yeah.
 14 If you look at Exhibit 1, you can look at
 15 the reason for which you've been designated by the
 16 university to testify today.
 17 And you go to that Exhibit 2, or sorry,
 18 Exhibit A. It's on the other side. It's a little
 19 confusing. And you were designated for number two
 20 and number four and number five.
 21 A. Yes.
 22 Q. And so you're aware of statement number
 23 four where it says registered student organizations
 24 at the University of Iowa that have employed
 25 criteria for the selection of leadership positions

111

1 they regard the LGBT community, would that have
 2 harmed their ability to provide a safe space?
 3 A. Can you repeat that?
 4 Q. Mm-hmm. So if you look at number two at
 5 the bottom of page two.
 6 A. Okay.
 7 Q. And it talks under those core beliefs, and
 8 it says that one of their core beliefs is that they
 9 welcome full participation and affirm those in the
 10 LGBT community.
 11 Do you think it would have been
 12 inconsistent with Love Works' purpose and mission to
 13 have to accept leaders that disagree with those core
 14 beliefs?
 15 A. Yes.
 16 Q. And would undermine their ability to
 17 provide a safe space?
 18 A. Yes.
 19 Q. Okay. And then House of Lord where it
 20 says it's a space for the support of black queer
 21 individuals.
 22 A. Yes.
 23 Q. So if they had been required to accept
 24 people who did not identify as black or queer that
 25 would undermine their ability to provide a safe

113

1 involving a preference for or against students with
 2 regard to their race, creed, color, religion,
 3 national origin, and the rest of the categories in
 4 the human rights clause?
 5 A. Yes.
 6 Q. Okay. So then your understanding as you
 7 sit here today is that those groups, the Love Works
 8 and House of Lord were allowed an exemption from the
 9 human rights policy to provide a safe space for
 10 those groups?
 11 A. Yes.
 12 Q. Do you think it would impair the message
 13 of a Jewish group if they had to have their Passover
 14 celebration led by a Muslim?
 15 A. Yes.
 16 Q. Do you think it would impair the ability
 17 of a Muslim group to hold a religious celebration of
 18 Eid Al-Fitr, the celebration of the end of Ramadan
 19 that was led by a Christian?
 20 A. Yes.
 21 Q. One of the common criticisms of religious
 22 groups particularly is that their leaders say one
 23 thing but actually believe another, the charges of
 24 hypocrisy. Do you think that if a religious group
 25 was required to have leaders who led them in prayer

114

1 and led them in Bible studies and led them in
 2 worship about things they thought were untrue, that
 3 that would open them up to charges of hypocrisy?
 4 A. Yes.
 5 Q. So you think it was reasonable for IVGCF,
 6 InterVarsity Graduate to want to have leaders that
 7 sincerely believe in the God they were praying to?
 8 A. Yes.
 9 Q. Do you think it would significantly impair
 10 the message of the prayer or the message of the
 11 Bible study if the person leading it didn't believe
 12 it?
 13 A. Yes.
 14 Q. Are you aware that the university has said
 15 that it doesn't apply the human rights clause to
 16 prevent organizations from requiring their leaders
 17 to agree with political or ideological beliefs?
 18 A. Can you repeat that?
 19 Q. Mm-hmm. So the university has stated in
 20 this litigation that it doesn't apply its human
 21 rights clause to prevent the UDems, for instance,
 22 from requiring their leaders to agree with a
 23 democratic platform?
 24 A. Yes, I'm aware of that.
 25 Q. And so then also, if there was a climate

115

1 change group, the university wouldn't prevent that
 2 group from requiring their leaders to believe in
 3 climate change?
 4 A. Yes.
 5 Q. Why would – does the university allow
 6 groups to exclude on that basis?
 7 A. I believe based on the interpretation of
 8 the human rights clause they wouldn't be considered
 9 protected classes.
 10 Q. And thinking of it from the perspective of
 11 the student who wants to lead one of these groups
 12 but disagrees, he's being excluded just like that
 13 student would have been excluded for InterVarsity
 14 Graduate, do you see any difference in the harm
 15 that's being caused to that student?
 16 A. No.
 17 Q. So the university is willing to accept the
 18 harm when it comes to a political or ideological
 19 group but not a religious group?
 20 A. Yes.
 21 Q. Okay. When it relates to say a political
 22 group that believes that the state has a very
 23 important role to play in poverty alleviation, could
 24 that group exclude leaders who did not agree with
 25 that position on poverty alleviation?

116

1 A. Yes.
 2 Q. All right. If a religious group had a
 3 religious belief about poverty alleviation based on
 4 the parable of the Good Samaritan, could they
 5 exclude leaders because the individual disagreed
 6 with their religious belief on poverty alleviation?
 7 A. No.
 8 Q. Is part of the reason that the university
 9 allows political and ideological groups to select
 10 leaders that agree with them kind of based on that
 11 First Amendment freedom of association?
 12 A. I don't know.
 13 Q. Are students free to express their views
 14 on campus?
 15 A. Yes.
 16 Q. All right. Is that protected by the First
 17 Amendment?
 18 A. Yes.
 19 Q. All right. Are they free to get together
 20 with friends to express those views?
 21 A. Yes.
 22 Q. Can they form groups of people to express
 23 those views?
 24 A. Yes.
 25 Q. And can they become registered at the

117

1 university to express those views?
 2 A. Yes.
 3 Q. Okay. So the groups have a constitutional
 4 right to come together to express those views?
 5 A. Yes.
 6 Q. All right. Are you aware that the
 7 university has admitted that it does not enforce its
 8 sex discrimination then against sport clubs?
 9 A. I am not aware.
 10 Q. All right. You don't have any knowledge
 11 about the sport clubs situation at all?
 12 A. Not being that that's an area I work in.
 13 I'm not entirely familiar with the sport clubs and
 14 policies.
 15 Q. When the university designated you to
 16 testify about sport clubs here in Exh bit A, they
 17 didn't inform you that you needed to have knowledge
 18 about that?
 19 A. No.
 20 Q. All right. So you weren't aware coming in
 21 today that you needed to know about the university's
 22 position on sport clubs?
 23 A. I was not.
 24 Q. Okay. For as long as you've been on
 25 campus, have there been men's and women's sport

118

1 clubs?
 2 A. Yes.
 3 Q. Do you know the reason why the university
 4 allows men's and women's sport clubs?
 5 A. I don't know the reason.
 6 Q. Okay. Switching gears from sport clubs to
 7 fraternities and sororities, are you familiar with
 8 sometime in July of August 2018 the university
 9 updated its human rights clause to include an
 10 explicit exemption for title -- under Title IX?
 11 A. Yes.
 12 Q. Okay. Is there any reason why that
 13 language wasn't included in your June 1 email that
 14 went out?
 15 A. I don't know if it had been decided upon
 16 at that point.
 17 Q. Okay. Do you know who was the decision-
 18 making group on that?
 19 A. I know it included our Fraternity/Sorority
 20 Life staff, Dr. Nelson, general counsel. I don't
 21 know who else beyond that.
 22 Q. But it didn't include you? You weren't a
 23 part of the decision-making group?
 24 A. I was made aware of it but not made aware
 25 of what the language would be.

119

1 Q. Were you asked for your input on it at
 2 all?
 3 A. Not that I recall.
 4 Q. Okay. Do you know precisely when the new
 5 language was adopted?
 6 A. I don't recall.
 7 Q. Were you informed why the university chose
 8 to create the exemption?
 9 A. Yes. There was concern from the national
 10 organizations of the fraternities and sororities
 11 around complying with the clause because of the
 12 Title IX exemption.
 13 Q. And what was that concern?
 14 A. That adding that clause would be
 15 contradictory to their Title IX exemption that
 16 they're granted.
 17 Q. Is the university required to permit a
 18 Title IX exemption or did it choose to adopt it?
 19 A. I don't know.
 20 Q. All right. Do you know what evidence the
 21 university considered before deciding to exempt
 22 Greek groups?
 23 A. I don't.
 24 Q. So like we were talking about earlier
 25 with, you know, the thousands of position that are

120

1 open with fraternities and sororities the
 2 university's interests in not having students be
 3 excluded, do you know if there was any evidence that
 4 was reviewed to determine that that wouldn't be a
 5 problem?
 6 A. I don't know if there was any evidence
 7 reviewed.
 8 Q. And you didn't review any evidence?
 9 A. No.
 10 Q. And you weren't asked to review any
 11 evidence?
 12 A. No.
 13 Q. Has the university set up a system to
 14 monitor the exemption for fraternities and
 15 sororities and ensure that it's not causing the
 16 kinds of harms it's concerned about for InterVarsity
 17 Graduate?
 18 A. No, not to my knowledge.
 19 Q. Did the university consider any
 20 alternatives to a complete exemption?
 21 A. I don't know.
 22 Q. Okay. Does the university recognize any
 23 nonsocial fraternities and sororities? So like an
 24 honor or service --
 25 A. Yes.

121

1 Q. Do you know which ones?
 2 A. I won't be able to rattle off the complete
 3 list but Alpha Kappa Psi, Professional Business
 4 Fraternity, Phi Mu Alpha, Men's Symphonia. Oh, my
 5 gosh, there are several others that I'd like to
 6 remember.
 7 Q. Do you know if Delta Sigma Theta is one?
 8 A. I don't off the top of my head.
 9 Q. And if Delta Sigma Theta held itself out
 10 as a service sorority, would you have any reason to
 11 think that was incorrect?
 12 A. No.
 13 Q. And if I had gone on the university's
 14 website the other day and seem Delta Sigma Theta as
 15 a recognized sorority, there wouldn't be any reason
 16 to think that was incorrect?
 17 A. No.
 18 Q. Is it a problem that the university's
 19 website says that Delta Sigma Theta has selective
 20 membership and is founded on principles of
 21 sisterhood?
 22 A. I don't know.
 23 Q. All right. Are they eligible for the
 24 Title IX exemption as a service sorority?
 25 A. I don't know.

122

1 Q. On February 6, 2019, so just like one
 2 month and a half ago, the same Federal District
 3 Court that we talked about a couple times now
 4 entered a permanent injunction in the BLinC case.
 5 Are you familiar with that ruling?
 6 A. Yes.
 7 Q. Have you reviewed it?
 8 A. Briefly.
 9 Q. Did you -- so when you reviewed it
 10 briefly, does that mean like you looked at the
 11 document and read it?
 12 A. I looked at the document and I didn't read
 13 it in its entirety.
 14 Q. Just skimmed it?
 15 A. Yeah.
 16 Q. Which portions did you skim?
 17 A. Mostly the last portion where the decision
 18 was made.
 19 Q. Do you know if anybody else in your office
 20 has reviewed it?
 21 A. I don't know.
 22 Q. All right. Do you know if Dr. Nelson has?
 23 A. I don't.
 24 Q. Okay. So you don't know if anybody has
 25 looked at it at all?

123

1 A. I don't know if anyone else has looked at
 2 it.
 3 Q. How did you get a copy of it?
 4 A. I believe I heard the decision was made
 5 and found it online.
 6 Q. Would I know the website of the place it
 7 might be found online?
 8 A. Probably.
 9 Q. Yeah, okay.
 10 Are you aware of any steps to implement
 11 that ruling in your office?
 12 A. No.
 13 Q. Has anyone directed you to do anything
 14 pursuant to that ruling?
 15 A. No.
 16 Q. Have you taken any steps personally
 17 pursuant to that ruling?
 18 A. No.
 19 Q. Is the university's current policy the
 20 same as the one that you enforced against
 21 InterVarsity Graduate last summer?
 22 A. Yes.
 23 Q. So if InterVarsity Graduate submitted the
 24 same constitution they submitted to you last summer
 25 then you would still say you have to be

124

1 deregistered?
 2 A. Yes.
 3 Q. Okay. And for the same reasons, the
 4 religious leadership requirements?
 5 A. Yes.
 6 Q. Okay.
 7 MR. BLOMBERG: I'd like to take a short
 8 break and then I think we'll just come back.
 9 THE REPORTER: We're off the record.
 10 (WHEREUPON, a brief recess was taken.)
 11 THE REPORTER: We are on the record.
 12 MR. BLOMBERG: Just a couple more quick
 13 things.
 14 Let me show you what's -- do you have
 15 Document 25?
 16 And what exhibit are we on?
 17 THE REPORTER: Exhibit 18.
 18 MR. BLOMBERG: Exhibit 18. Can you please
 19 mark this as Exhibit 18?
 20 THE REPORTER: Exhibit 18 is marked.
 21 (WHEREUPON, Exhibit 18 was marked for
 22 identification.)
 23 BY MR. BLOMBERG:
 24 Q. Mr. Kutcher, if you could please take a
 25 look at the document that's marked Exhibit 18.

125

1 A. Okay.
 2 Q. Do you recognize the document?
 3 A. Yes.
 4 Q. Have you ever seen it before?
 5 A. Yes.
 6 Q. Did you help prepare it?
 7 A. I did.
 8 Q. Were you the one who prepared it?
 9 A. I was.
 10 Q. Did anyone else assist you?
 11 A. No.
 12 Q. When was it prepared?
 13 A. It was prepared, I believe, January of
 14 this year.
 15 Q. And how was it prepared? What data did
 16 you look at to put this document together?
 17 MR. CARROLL: Sorry, could you repeat that
 18 question?
 19 MR. BLOMBERG: Oh, yeah, yeah.
 20 BY MR. BLOMBERG:
 21 Q. What data did you look at to put this
 22 document together?
 23 A. I looked at all of our registered
 24 organizations at the time and what organizations we
 25 had stopped any kind of review on or compliance

126

1 efforts on.
 2 Q. Was this based on that review you were
 3 talking about in November 2018 where you did all 500
 4 groups or is that an additional separate view where
 5 you looked at all the groups?
 6 A. No, this is based on that November review.
 7 Q. Okay. Did you have any reason at the time
 8 you compiled this list to think that it was
 9 incorrect?
 10 A. No.
 11 Q. So this list is correct to the best of
 12 your knowledge?
 13 A. Yes.
 14 Q. Let me show you – can you hand me
 15 Document 24, please?
 16 Can you mark this as an exhibit, please?
 17 THE REPORTER: Exhibit 19 is marked.
 18 (WHEREUPON, Exhibit 19 was marked for
 19 identification.)
 20 BY MR. BLOMBERG:
 21 Q. Mr. Kutcher, I'm handing you the document
 22 that's been marked Exhibit 19.
 23 Can you please take a look at that and let
 24 me know when you're done?
 25 A. Okay.

127

1 Q. Do you recognize that document?
 2 A. Yes.
 3 Q. Did you help prepare it?
 4 A. Yes.
 5 Q. Were you the one who prepared it?
 6 A. Yes.
 7 Q. What information did you use to prepare
 8 it?
 9 A. I used a listing of our student
 10 organizations, a listing of those that we had
 11 stopped review on, as well as a listing of orgs that
 12 had not reregistered or who had not submitted our
 13 governing – governing documents during our
 14 compliance efforts in June.
 15 Q. Were there any substantive differences
 16 between this document and the one that you just
 17 reviewed a moment ago?
 18 A. Yes. The inclusion of our groups that
 19 failed to reregister or requested deregistration or
 20 failed to submit governing documents.
 21 Q. Going back to Exhibit 18.
 22 A. Yep.
 23 Q. Let's look at a couple examples here with
 24 you.
 25 A. Okay.

128

1 Q. Do you see the bottom of page five? Does
 2 that list Hawkapellas Iowa as compliant?
 3 A. Yes.
 4 Q. Do you see the bottom of page six? Does
 5 that list Intersection as compliant?
 6 A. Yes.
 7 Q. On the next page, page seven, about four
 8 or five lines down, do you see how it lists Iowa
 9 Edge student organization as compliant?
 10 A. Yes.
 11 Q. Do you see how midway down page eight,
 12 just above Lutheran Campus Ministry in blue it lists
 13 Love Works as compliant?
 14 A. Yes.
 15 Q. Do you see on page 11, just beneath the
 16 S kh Awareness Club where it lists SistaSpeak as
 17 compliant?
 18 A. Yes.
 19 Q. And then near the bottom of page 13, do
 20 you see how it lists the Veterans Association as
 21 compliant?
 22 A. Yes.
 23 Q. And then if you look on that same page, a
 24 couple down from 24/7, do you see how it lists the
 25 Women's and Men's Ultimate Frisbee Clubs as

129

1 compliant?
 2 A. Yes.
 3 Q. Do you have any reason to think that any
 4 of these groups were ever not compliant between the
 5 time you did this compilation and the end of your
 6 review in summer of 2018?
 7 A. No.
 8 Q. Okay. And none of those groups were
 9 listed on the defunct groups that we looked at
 10 earlier; correct?
 11 A. Other than Hawkapellas on seven.
 12 Q. And that was just on the noncompliant list
 13 but it wasn't on the defunct list; correct?
 14 A. Correct; yes.
 15 Q. And at the time you compiled this list,
 16 like you said earlier, you think it was all correct?
 17 A. Yes.
 18 Q. Looking at document, Exhibit 19, the very
 19 bottom of the first page there, do you see how Love
 20 Works has been removed from compliant to stopped
 21 review due to pending BLinC InterVarsity litigation?
 22 A. Yes.
 23 Q. Why was that change made?
 24 A. Based on advice of counsel.
 25 Q. All right. So there wasn't any difference

130

1 from the analysis of the constitution that you had
 2 made?
 3 A. Correct.
 4 Q. Okay. So you were told that you needed to
 5 change this?
 6 A. Yes.
 7 Q. And that was the only basis you had for
 8 making the change?
 9 A. Yes.
 10 MR. BLOMBERG: Nothing further.
 11 MR. CARROLL: I have a few questions for
 12 you.
 13 EXAMINATION
 14 BY MR. CARROLL:
 15 Q. Looking at Exhibit 19 that you were just
 16 asked to review, what is this on the first page?
 17 And I'm just going to point to it. What is the
 18 significance of the blue highlight here?
 19 A. These are religious organizations that we
 20 stopped any kind of review of their governing
 21 documents during pending litigation.
 22 Q. Okay. And so, in fact, your office was
 23 directed to put these groups highlighted in blue on
 24 hold; correct?
 25 A. Correct.

132

1 A. Yes.
 2 Q. And what is Exhibit 20?
 3 A. The constitution of Women in Science and
 4 Engineering.
 5 Q. Okay. And that's known as WISE?
 6 A. Yes.
 7 Q. Do you recall earlier today you were asked
 8 multiple questions about WISE?
 9 A. Yes.
 10 Q. Okay. And you were asked a question about
 11 whether WISE could properly use the word "encourage"
 12 that InterVarsity couldn't?
 13 A. Yes.
 14 Q. Do you remember those questions?
 15 A. Yes.
 16 Q. Would you look to Article 2, Membership,
 17 subsection (b)?
 18 A. Yes.
 19 Q. Read it out loud, please.
 20 A. "Members are encouraged, but not required,
 21 to be any of the following: a woman, a student in
 22 science or engineering field, or interested in
 23 science and outreach to the community."
 24 Q. Okay. So isn't it fair to read this to
 25 say "encouraged, but not required"?

131

1 Q. Okay. And at the bottom of the first page
 2 of Exhibit 19, what group is listed?
 3 A. Love Works.
 4 Q. Okay. So is it accurate to say as you sit
 5 here today that Love Works' review of its
 6 constitution is on hold?
 7 A. Yes.
 8 Q. You understand the BLinC ruling basically
 9 said we weren't applying our rules fairly?
 10 A. Yes.
 11 Q. Okay. Do you think it was prudent to put
 12 the religious groups on hold pending the outcome of
 13 the litigation?
 14 A. Yes.
 15 Q. Okay. Then I'm going to show you -- what
 16 exhibit would we be at?
 17 THE REPORTER: Exh bit 20.
 18 MR. CARROLL: Exhibit 20. Will you mark
 19 this, please?
 20 THE REPORTER: Exh bit 20 is marked.
 21 MR. CARROLL: Thank you.
 22 (WHEREUPON, Exhibit 20 was marked for
 23 identification.)
 24 BY MR. CARROLL:
 25 Q. Are you familiar with Exhibit 20?

133

1 MR. BLOMBERG: Objection; leading
 2 question.
 3 MR. CARROLL: You can answer.
 4 THE WITNESS: Can you repeat the question?
 5 MR. CARROLL: Yes.
 6 BY MR. CARROLL:
 7 Q. Yes. It specifically says "encouraged,
 8 but not required"; correct?
 9 A. Yes.
 10 Q. So you're not required to be a woman to be
 11 in WISE, are you?
 12 A. Correct.
 13 Q. Okay. Did InterVarsity submit anything
 14 similar to what we see in Exhibit 20?
 15 A. Not that I recall.
 16 Q. Then do you recall when you were asked
 17 questions about why the religious groups were
 18 reviewed perhaps first?
 19 A. Yes.
 20 Q. Okay. Were you told to review those
 21 first?
 22 A. Yes.
 23 Q. Okay. Do you understand where the
 24 direction came from?
 25 A. No.

134

1 Q. Okay. You were also asked questions about
 2 separating out the charts. Isn't it true that
 3 fraternities and sororities were separated out for
 4 the review?
 5 A. Yes.
 6 Q. And who provided that separate review so
 7 that you could plug it into the chart?
 8 A. The Fraternity and Sorority Life staff.
 9 Q. And who was the person that probably was
 10 the most involved in that review?
 11 A. Erin McHale.
 12 Q. Okay. So, in fact, the reviews of
 13 different types of organizations were separated out;
 14 is that fair?
 15 A. Yes.
 16 Q. Did you in any manner when you did your
 17 review of the religious group attempt to target them
 18 in the review?
 19 A. No.
 20 Q. Okay. And you were asked questions about
 21 the website saying groups are defunct?
 22 A. Yes.
 23 Q. Okay. You don't know how that happened;
 24 correct?
 25 MR. BLOMBERG: Objection; leading.

135

1 Continue.
 2 THE WITNESS: Can you repeat the question?
 3 MR. BLOMBERG: Yes.
 4 BY MR. BLOMBERG:
 5 Q. So to me the word "defunct" means
 6 different than deregistered.
 7 A. Okay.
 8 Q. Okay. Do you view the word "defunct" to
 9 mean the same as deregistered from the University of
 10 Iowa?
 11 A. Yes.
 12 Q. Okay. Let me check real quick.
 13 And then if you would look at Exhibit 18,
 14 do you recall questions about -- well, maybe you
 15 don't recall. I'll ask a specific question.
 16 Is Love Works on here as pending
 17 litigation?
 18 A. No.
 19 Q. Okay. And you created this chart?
 20 A. Yes.
 21 Q. Was that a mistake on your part?
 22 A. Yes.
 23 MR. CARROLL: No further questions.
 24 MR. BLOMBERG: Can I redirect?
 25 BY MR. BLOMBERG:

136

1 Q. So how did you find out that it was a
 2 mistake on your part?
 3 A. It was brought to my attention by counsel.
 4 Q. Okay. And we reviewed earlier how the
 5 university argued in Federal Court that the Love
 6 Works group was providing a safe space and so it was
 7 permissible under the human rights clause; correct?
 8 A. Yes.
 9 Q. And you didn't receive any information to
 10 suggest that what the university told the Federal
 11 Court was wrong?
 12 A. That's correct.
 13 Q. All right. And you haven't received any
 14 information to say that Love Works' constitution is
 15 noncompliant; correct?
 16 A. Can you repeat that?
 17 Q. You haven't received any information to
 18 say that Love Works' constitution is noncompliant;
 19 correct?
 20 A. Correct.
 21 Q. Okay. So Love Works has just been grouped
 22 with all of the religious groups that have been
 23 placed on some sort of hold but that's all you know
 24 about it?
 25 A. Yes.

137

1 Q. Okay.
 2 MR. BLOMBERG: Nothing further.
 3 MR. CARROLL: Nothing further.
 4 THE REPORTER: Thank you. We're off the
 5 record.
 6 (WHEREUPON, at 1:11 p.m., the deposition
 7 of ANDREW KUTCHER concluded.)
 8
 9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

CERTIFICATE

1
2
3 I, Ryan Batterson, do hereby certify that I reported
4 all proceedings adduced in the foregoing matter and that
5 the foregoing transcript pages constitutes a full, true,
6 and accurate record of said proceedings to the best of
7 my ability.

8
9 I further certify that I am neither related to
10 counsel or any part to the proceedings nor have any
11 interest in the outcome of the proceedings.

12
13 IN WITNESS HEREOF, I have hereunto set my hand this
14 4th day of April, 2019.

15
16
17
18
19
20 /s/ Ryan Batterson

21
22
23
24
25

DECLARATION

1
2 Deposition of: Andrew Kutcher Date: 03/28/19
3 Regarding: Intersivity Christian vs. U of Iowa
4 Reporter: Batterson/Morrison

5 _____
6
7 I declare under penalty of perjury the following to
8 be true:

9
10 I have read my deposition and the same is true and
11 accurate save and except for any corrections as made
12 by me on the Correction Page herein.

13
14 Signed at _____,
15 on the _____ day of _____, 2019.

16
17
18
19
20
21
22
23
24 Signature _____
25 Andrew Kutcher

CORRECTION SHEET

1
2 Deposition of: Andrew Kutcher Date: 03/28/19
3 Regarding: Intersivity Christian vs. U of Iowa
4 Reporter: Batterson/Morrison
5 _____
6 Please make all corrections, changes or clarifications
7 to your testimony on this sheet, showing page and line
8 number. If there are no changes, write "none" across
9 the page. Sign this sheet on the line provided.

10 Page Line Reason for Change
11 _____
12 _____
13 _____
14 _____
15 _____
16 _____
17 _____
18 _____
19 _____
20 _____
21 _____
22 _____
23 _____

24 Signature _____
25 Andrew Kutcher

<u>1</u>	94:17 94:18	<u>2</u>	2019 6:4
1 8:13 10:3	106:7	43:21	122:1
48:19	106:23	44:2	20th 52:22
54:5	106:25	68:19	53:3 53:5
68:14 68:21	108:8 108:9	112:17	53:8
76:10	108:11	132:16	54:19
112:14	108:12	20 10:6 11:14	56:5
118:13	108:13	81:4 131:17	57:20 61:15
1:07 73:18	108:18	131:18	77:5 78:9
75:19	17-2 13:22	131:20	85:14
1:11 137:6	18 78:19	131:22	23rd 104:23
10:38 6:5	88:14 106:7	131:25	24 126:15
100 48:1 48:2	106:23	132:2	24/7 128:24
48:3 48:7	124:17	133:14	25 93:3 98:16
53:14	124:18	200 28:24	124:15
101-1 13:22	124:19	29:2 46:9	26 70:2
11 128:15	124:20	2008 68:19	27 68:3
12 68:6 73:18	124:21	2011 8:3	28 6:4 83:8
12th 63:17	124:25	2017 7:12	28th 104:24
74:14 82:15	127:21	7:20 8:5	2nd 82:19
13 58:11 68:4	135:13	8:6 9:21	83:1
68:8	18th 85:21	10:3 11:4	<u>3</u>
68:12	85:22	11:4 11:5	3 48:9 70:23
128:19	19 126:17	11:10 12:18	3:12 48:19
13th 59:21	126:18	34:12 34:18	54:5
60:1	126:22	35:11	30 10:6
60:11 60:16	129:18	2018 36:10	30 (b) (6) 8:21
60:24 82:15	130:15	37:1	31st 49:18
14 70:3 70:6	131:2	37:19 40:12	54:23
15 73:12	1921 47:2	44:10 48:19	38 88:25
73:13 73:14	Inst 53:3	51:12 51:15	<u>4</u>
157 46:11	1st 53:7	54:5	4 57:24
15th 59:21	55:11	58:12	71:3 71:7
60:3 60:7	56:5	72:2 80:2	74:6
85:14	57:20	80:5 83:8	4:02 58:12
16 81:6	60:5	88:14	
81:8 81:10	61:13 61:18	93:5 103:24	
17 94:10	76:19	104:2 104:7	
	77:2	118:8 126:3	
	77:10 77:17	129:6	
	78:9		

4:05 75:22	111:2	according	advertise
<hr/>	111:16	82:2	26:20
5	111:25	account 78:3	advice 129:24
<hr/>	113:16	Accountabilit	advise
5 7:12 8:6	able 12:17	y 12:8	14:18
50 48:4	16:2 16:3	19:19	15:8 31:11
48:4 48:6	16:7 16:9	accurate	advised 32:4
53:12 53:16	17:1	131:4	advisor 49:3
500 40:16	21:22 21:23	achieve 15:24	advisors
41:9	26:16	16:17	31:13
41:21	40:5	across	affairs
42:2	69:14 121:2	38:25 41:15	15:2 31:24
45:20 45:25	absolutely	action 38:2	affirm 111:9
51:2	35:25 35:25	active 19:7	afternoon
51:14 126:3	66:21 72:23	19:8	54:6
50-plus 54:21	73:6	activities	against
<hr/>	84:19	64:11 69:19	38:2
6	90:8 95:21	actual 50:4	84:16 84:22
6 88:4 88:9	academic	actually 64:7	98:22 113:1
89:14 89:21	16:10 27:9	98:17 106:8	117:8
89:22 90:10	academically	113:23	123:20
122:1	27:3 27:9	adding 119:14	agendas 30:9
<hr/>	30:5	additional	ago 60:5
7	accept	126:4	61:12 79:13
7 44:10	20:22	administrativ	80:8
88:4	110:24	e 107:19	94:24 122:2
88:24 89:10	111:13	admissions	127:17
89:14 90:10	111:23	14:7	agreed 21:21
91:4 91:5	115:17	admitted 42:4	ahead 20:15
103:20	accepted	43:1 117:7	aim 68:22
7th 44:12	80:18	adopt	air 26:4
<hr/>	access	102:24	alcohol 10:22
8	12:17	119:18	Al-Fitr
8 105:23	30:5 102:20	adopted 119:5	113:18
105:23	accidentally	advantage	Alleged 9:24
81-1 106:2	54:19	18:8	alleviation
<hr/>	accommodate		115:23
A	103:12		
a.m 6:5 58:12	accommodation		
ability 92:24	103:17		
105:10			

115:25	72:19 72:25	anything	appointment
116:3 116:6	105:4	12:12 12:19	32:7
all-female	116:11	22:14	approve 74:10
23:8	116:17	31:7 34:8	approved
23:12 65:12	among 110:16	38:3	47:15
67:14 69:11	amount 33:16	44:25 62:18	77:1 80:24
Alliance 32:6	analysis	62:22	approximately
allow 22:13	130:1	69:1	45:20
115:5	Andrew 6:2	78:23 86:16	April 52:22
allowed	6:7 6:15	98:7	53:2 53:5
22:9	9:1 137:7	101:3 101:8	53:8
23:12 23:14	Angela 12:7	123:13	54:19
24:21	Anita 35:2	133:13	56:5
38:8 76:9	41:3 50:8	anytime 26:6	57:20 61:15
84:15 84:21	answer 6:23	anyway 7:1	77:5 78:9
85:4	6:23 6:24	anywhere	80:2
93:14 107:2	81:18 133:3	55:10 70:19	area 117:12
113:8	anybody 39:12	apart 50:3	areas 26:15
allowing	45:3 83:5	apologize	aren't
98:12 100:5	84:3	26:1	38:10 92:15
112:5	97:24	30:24 77:9	argued 136:5
allows	122:19	apparent	Article 68:14
95:12 116:9	122:24	107:17	68:21 70:23
118:4	anymore 92:21	appear 8:20	71:3 71:7
Alpha 121:3	anyone 12:3	48:14	132:16
121:4	12:21 13:16	application	articulate
already	37:8	35:9	109:20
14:5 14:7	37:14 39:17	35:18	assist
30:4	39:18	38:8	44:14
alternative	41:7	38:16 38:21	125:10
75:11 75:12	44:14 49:21	84:7 84:10	associate
97:1 102:7	50:2	applied	30:18
alternatives	51:19	102:25	Associated
102:18	52:6 52:9	103:3	29:9
120:20	52:15	apply 62:1	association
am 25:7	54:1	114:15	32:5
100:14	57:16 59:11	114:20	56:14 56:18
117:9	71:17 123:1	applying	66:1 90:2
Amendment	123:13	131:9	
	125:10		

90:3 116:11	80:4	123:10	129:24
128:20	98:10 118:8	awareness 7:2	basically
assume 87:7	aware 34:14	38:11	102:10
102:5	34:15 34:20	99:4 128:16	131:8
athletics	34:24 36:25	away 19:9	basis 32:25
28:18	50:2 54:1	57:10	33:1 33:2
attached 20:8	54:4 60:9		40:2
attempt	60:17 60:19	B	69:18 85:23
100:10	60:22 60:25	background	115:6 130:7
100:17	61:6	6:21 14:9	bathroom 26:4
102:6	61:10 72:11	14:12	became 29:21
102:17	79:3 79:4	bad 97:19	become 40:8
134:17	82:10 82:14	balance	116:25
attend 29:8	83:5	97:5	becoming 49:9
29:11	83:10	97:25 98:5	behalf 8:8
attendance	84:3 84:5	based 15:25	8:9
16:8	87:12 87:14	22:23	behavioral
attended	87:18 87:22	23:2	9:24
17:11	93:21 95:11	24:12 36:18	behind 14:9
attention	97:8 97:9	38:9	belief
136:3	97:24	42:16	42:17 64:11
attorney 6:12	98:1	45:6	116:3 116:6
11:24 55:21	98:20 98:21	46:21 47:23	beliefs
73:22 74:21	98:23 98:24	50:11 61:17	42:7
75:18	99:9	62:9 63:4	42:11 42:13
106:14	100:4 100:9	63:13 63:23	42:15
108:24	100:10	65:22 66:18	43:9 62:9
attorneys	100:14	67:8	62:11 63:23
6:20	100:20	67:16	64:5 71:2
12:24 64:24	101:3	69:3	71:7
attract 92:24	101:20	80:10 83:20	71:11 71:11
attractive	102:6	87:3	93:11 99:22
26:22	102:20	91:17	109:8
audience	104:17	93:4 93:8	110:25
17:21	107:6	94:15 94:20	110:25
August	112:22	95:22 96:16	111:7 111:8
78:17 78:18	114:14	98:14 99:22	111:14
78:19	114:24	112:6 115:7	114:17
	117:6 117:9	116:3	believe
	117:20	116:10	
	118:24	126:2 126:6	
	118:24		

10:6 21:1	28:3	73:10 73:16	box 55:15
25:17 30:14	80:21	81:9	64:19 77:22
33:25 33:25	126:11	81:12 90:11	78:7
34:6	beyond	90:15 90:16	branched
39:25 45:17	53:17 60:18	91:1	31:25
45:22	60:19 86:16	106:1 106:4	break 7:16
46:9 47:4	118:21	106:6	26:2 73:4
48:3 48:8	Bible 64:9	108:10	124:8
49:25 51:11	114:1	108:15	breath 26:3
58:22 59:25	114:11	108:16	brief 73:8
67:8	biggest 28:8	124:7	124:10
67:16	Bill 12:25	124:12	briefly 122:8
69:6	12:25	124:18	122:10
78:17 85:21	35:1 39:2	124:23	bright 102:25
86:9	39:16	125:19	bring 20:17
88:23	binary 102:10	125:20	68:22 69:10
89:5	binder 8:15	126:20	broadly 16:1
89:17 100:3	bit 14:1 14:2	130:10	brokerage
103:5 104:4	14:12 25:20	133:1	22:11
106:22	25:20 28:13	134:25	brought 18:22
113:23	70:9	135:3 135:4	136:3
114:7	black	135:24	Budnick 66:13
114:11	111:20	135:25	bulk 47:9
115:2 115:7	111:24	137:2	47:12
123:4	BLinC 10:17	blue 128:12	Business
125:13	10:17 34:12	130:18	10:11 13:23
believes	35:18	130:23	22:11
115:22	37:2 38:2	board 38:25	106:18
beneath	40:4	41:16 73:23	108:19
128:15	43:10 83:17	87:21	121:3
benefit 16:23	122:4	body 94:11	
benefits	129:21	94:17	
16:14 16:16	131:8	bookings 69:9	
27:24	Blomberg 6:10	bottom 9:1	
102:19	6:11	70:22	
benefitted	68:10 68:18	106:25	calculation
29:23	68:20	109:6 111:5	97:15 97:21
besides 49:22	70:5	128:1 128:4	102:21
86:20	70:10 70:12	128:19	campus
best 15:20	73:4 73:6	129:19	18:25 25:25
20:16 26:14		131:1	27:2 28:9

28:16	Cary 66:13	certain 21:22	chose 91:11
29:1	case 6:12	26:15 41:13	92:10 119:7
29:18	10:12 10:17	42:6 69:19	chosen 54:15
30:4	13:24	Certainly	Christ
32:12	14:5 37:2	68:18 90:11	10:12 13:23
47:1 97:4	83:18 122:4	chain 75:13	106:19
104:14	cases 9:19	75:15	108:19
116:14	9:22 10:1	chalking 18:2	Christian
117:25	10:4 10:7	chance	49:4 49:6
128:12	12:18 13:10	43:23 81:1	58:22
campuses	13:11	change	62:9 63:9
102:2	catch 26:3	24:18 72:10	63:11 63:23
cappella	categories	74:10 80:19	64:4
65:12 67:14	43:14 45:11	102:13	66:15 66:24
68:23 69:11	59:13 113:3	102:19	74:17
caption	categorize	115:1 115:3	86:4 97:2
106:10	26:14	129:23	103:10
108:21	category 29:2	130:5 130:8	113:19
carefully	42:18 43:15	changed	Christians
98:5	45:6	47:3 47:5	62:24
Caribbean	cause 72:24	changes 30:11	63:2 86:8
56:14 90:1	caused	changing	clarification
CARROLL 68:16	69:22	73:24 82:2	7:6
70:8 73:5	93:7	characteristi	clarify
90:9	98:12	cs 36:20	66:4 68:5
90:13 90:23	115:15	charges	class 22:24
105:25	causing	113:23	31:14
106:3	100:12	114:3	63:7 109:17
125:17	120:15	chart 134:7	classes 36:19
130:11	celebration	135:19	115:9
130:14	113:14	charts 134:2	clause 10:8
131:18	113:17	check 42:5	11:17 11:21
131:21	113:18	74:19 75:18	13:14 22:18
131:24	Center	135:12	22:24 24:16
133:3 133:5	14:18	Chinese 32:4	33:23
133:6	15:5	choice 102:10	34:1 34:4
135:23	19:17 30:18	choose 119:18	34:9
137:3	31:22		36:20 38:16
carve-out	32:8 81:19		42:16 42:19
99:21			42:24

47:4 47:5	23:19 23:23	60:23 74:25	31:17 41:8
47:11 47:13	24:12 24:21	communicating	compliance
47:20 47:21	24:25 28:10	57:14 58:17	46:15 46:15
49:10 49:20	56:23	communication	46:16 46:18
50:12 50:14	57:9 57:9	17:16	49:19 56:23
51:17	57:11	18:4 35:4	57:10 76:22
57:7	66:5	57:8 60:8	86:1 86:6
62:12	66:12 117:8	61:18	87:6 125:25
63:3 63:5	117:11	75:7 83:2	127:14
63:14 64:21	117:13	communication	compliant
65:13 65:23	117:16	s 64:20	45:21
66:6 67:9	117:22	75:8 79:1	46:3 46:7
67:15 67:19	118:1 118:4	79:17	49:9
69:18 72:20	118:6	community	52:25
84:16 84:22	128:25	111:1	57:6
88:1	coach 69:9	111:10	85:25
105:1 107:7	College 22:11	132:23	87:4
110:13	23:8	compare 28:21	128:2 128:5
112:4	color 113:2	compelling	128:9
112:10	comes 115:18	107:2	128:13
113:4	coming 19:2	compilation	128:17
114:15	26:13 63:25	129:5	128:21
114:21	117:20	compile 44:17	129:1 129:4
115:8 118:9	committee	44:20	129:20
119:11	18:17 18:21	45:5 45:13	complied 87:1
119:14	19:15 19:23	compiled 45:9	comply 77:15
136:7	20:3	45:15 45:18	complying
cleaned 70:8	20:19	126:8	119:11
clear 7:4	21:7	129:15	compound 7:4
60:13 77:9	21:13	compiling	concern 21:16
clearly 7:7	22:4 23:18	44:6 44:12	21:18 21:24
climate	common	complaints	38:11
114:25	53:19	98:21 98:23	64:1
115:3	113:21	complete	72:13
club 21:19	communicate	89:11	76:5 76:7
24:2	17:8	120:20	104:24
24:16	17:19 17:24	121:2	105:3 119:9
128:16	69:24	completely	119:13
clubs 14:21	105:11		concerned
14:23 14:24	communicated		120:16
15:9			

concerns	115:8	41:9	copies 90:9
21:16 22:18	119:21	45:21 45:25	copy 37:11
38:4	consistent	46:4 46:8	70:1 123:3
66:14	63:18 86:13	46:25 47:14	core 71:2
67:3 69:2	87:25	47:18	71:7
72:24 83:21	constitution	57:6	71:10 109:8
concluded	20:12 22:17	76:24 80:16	111:7 111:8
137:7	24:18 47:22	89:19 108:5	111:13
conclusion	49:10 50:13	consulting	correct
46:2	50:19 51:21	15:19	8:22
conduct	60:24 61:14	contact	11:11 14:25
9:19 9:22	61:20 62:22	57:2 74:20	16:14 16:15
10:4 10:7	68:12 68:17	contacting	20:10
10:16 10:21	70:2	57:4	21:5
12:18 40:15	70:18 71:15	continue	34:19 34:23
conducting	71:19 72:10	98:13 100:6	36:24 41:11
30:8	73:24	107:16	42:7
confirmation	76:3	135:1	42:21 43:12
80:17 80:25	76:18 80:17	continuing	59:22
conflicting	81:18 81:21	83:17	62:5
47:8	82:1	93:6 93:7	63:10 65:17
confusing	82:17 82:19	contradicted	66:8
112:19	83:3 86:2	47:19	69:16 69:23
confusion	86:7 102:13	contradictory	69:23 69:25
59:23	103:23	34:8	74:12 81:22
connected	109:7 109:9	47:21 50:14	81:23
27:17 27:19	109:16	50:16 62:11	83:4 83:7
30:2	123:24	67:18 67:20	85:16 87:19
connecting	130:1 131:6	119:15	94:15 94:21
27:15	132:3	control 8:1	101:22
connections	136:14	conversation	102:1
30:3	136:18	40:3 86:13	112:11
consider	constitutiona	coordinator	126:11
96:25	1 56:23	30:16	129:10
120:19	62:10 117:3	coordinators	129:13
consideration	constitutions	66:12	129:14
s 22:5 22:7	20:13 20:15	copied 59:7	129:16
considered	23:18	88:11	130:3
	25:5 25:9		130:24
	25:12 25:15		130:25
	34:5 36:7		133:8
	40:17		133:12

134:24	136:11	deactive 19:9	106:10
136:7	court's 37:18	deadline	defense
136:12	37:19 38:20	53:20 59:20	106:18
136:15	72:15 83:20	60:3 60:6	define 38:6
136:19	cover 44:1	60:17	defined 28:12
136:20	create	December 7:12	31:15
corrections	96:11 119:8	8:5 8:6	Definitely
82:12	created 25:16	34:18 35:11	90:15
correctly	98:3 135:19	decided 77:12	defunct 88:25
25:7	creed 113:2	87:1 118:15	89:3 91:3
Cory 35:2	criteria	deciding	91:9
41:3 50:8	21:10	119:21	91:12 91:15
counsel	23:4	decision 21:3	92:8
12:1 50:1	94:20	34:12 85:18	92:15
75:2	112:25	85:23 86:20	103:22
78:16 78:23	criticisms	86:23 87:13	103:23
79:2	113:21	87:24 88:16	104:2 129:9
89:16 90:10	current	97:21	129:13
118:20	7:11 8:4	100:24	134:21
129:24	34:18	101:5 101:7	135:5 135:8
136:3	123:19	102:23	deleted 17:13
counsel's	currently	103:2	Delta 121:7
19:21 89:6	19:7	118:17	121:9
counterpart	<hr/>	122:17	121:14
19:6	D	123:4	121:19
19:11 20:14	<hr/>	decision-	democratic
couple 9:4	daily 32:25	making	114:23
122:3	Dance 28:14	118:23	department
124:12	Daniel 6:11	decisions	15:8
127:23	data 97:25	14:10 20:20	16:11 23:20
128:24	125:15	63:6	66:7
course 105:20	125:21	dedicate	depended
court 14:6	date 44:8	41:19	41:19
37:1	47:7	deemed	depending
38:15	48:19 68:17	50:13 50:15	17:20 26:13
83:9	85:17 88:13	52:25 85:24	28:25
83:14 83:17	day 39:25	Defendants	depends 18:14
104:23	54:16 58:14	108:20	28:23
104:24	121:14	Defendant's	
122:3 136:5			

deposed 6:16	deregistering 102:7	different 14:3	110:20
deposition 6:1 8:22	deregistratio n 53:20	15:25	110:24
9:15 12:4	87:10 105:6	17:1	116:5
13:17 13:21	127:19	20:13	disagrees 115:12
14:2	describe 9:23	30:6	disciplinary 10:15
43:21 48:10	32:14	75:11	discovered 54:20
57:24	designated 112:9	77:6	55:1 55:7
88:5 137:6	112:15	80:11 82:24	discovery 79:5
depositions 14:3	112:19	85:11	discriminatio n 69:18
derecognition 112:10	117:15	101:16	107:24
derecognize 34:12 69:22	designed 25:23	101:24	117:8
87:2	desk 37:15	101:25	discuss 12:16
derecognized 89:11	details 10:20	104:9	35:8
deregister 83:17	determination s 18:23	104:25	discussed 12:13 12:17
87:5 87:7	determine 21:10 45:20	134:13	14:6
87:24 88:16	52:9 79:9	135:6	73:21 86:17
89:8 97:22	100:11	differently 28:13	discussing 33:24
deregistered 9:21 11:3	120:4	digital 17:18	discussion 35:17 74:15
11:9	determined 47:19 67:17	direct 15:6	93:19
11:15 11:20	89:15	26:17	103:12
54:3	development 15:11 15:15	directed 44:19	discussions 35:13
85:15	16:10 30:16	123:13	101:24
87:8	dialoguing 59:17 82:17	130:23	displays 17:18
88:22 89:11	difference 95:8 96:1	direction 54:24	distribution 57:18 57:19
91:16 92:20	96:4 115:14	76:8 133:24	District 36:25 37:18
93:5	differences 127:15	directly 49:13 49:15	83:9 122:2
98:17 100:2		77:19 77:24	
102:15		77:25	
102:19		director 12:7	
104:7		30:18	
104:15		disagree 111:13	
104:20		disagreed	
124:1 135:6			
135:9			

Diversity 32:8	129:18	49:14 49:25	easy 54:9
divide 41:12	documentation 21:22	54:15	Edge 56:10
diving 21:19	documents 9:14 9:17	55:2	65:22
Division 19:20	9:20 11:2	57:24	90:1 128:9
Docket 13:22	11:8	68:7	educational 107:3
document 8:16	11:10 11:23	87:12 87:15	107:21
9:5 9:18	12:10	88:5 99:3	effective 17:15 17:18
10:16	13:1 13:3	99:7 118:20	17:23
11:1	13:4 13:6	122:22	effort 76:22
11:13 11:19	13:8	drafted 76:15	efforts 126:1
20:16 37:21	13:20	dual 32:7	127:14
62:3 68:3	16:6 47:6	due 129:21	Eid 113:18
68:11 68:18	53:1 58:6	duly 6:7	eight 9:2 9:9
70:2	61:5	during 74:14	128:11
70:15 70:17	64:23	127:13	either 22:23
70:20	79:6 79:9	130:21	44:1 56:4
74:6	81:20 85:25	duties 14:14 15:10	59:8 67:9
76:11 76:15	87:4 98:2	18:16 70:24	70:22 77:20
81:4	127:13		80:16 87:18
81:13	127:20	<hr/> E <hr/>	102:13
88:9	130:21	earlier 17:11	eligible 102:20
88:24	done 41:23	19:14 23:20	121:23
103:20	87:6	26:2	else 12:12
105:23	92:16	30:14 32:21	12:19 12:21
105:24	126:24	33:24 35:10	13:16 22:14
106:8	door 27:14	50:25	39:17 39:18
106:17	Dr 12:25	51:9	41:7
106:24	32:14 32:16	64:15 71:23	44:25
108:17	32:22	74:6 78:5	45:3 50:2
122:11	33:8	83:22 104:9	52:6
122:12	33:14	109:9	52:15
124:15	35:1 35:2	119:24	54:1
124:25	35:10	129:10	57:16 62:18
125:2	39:5	129:16	62:22 71:17
125:16	39:16 39:20	132:7 136:4	83:5 84:3
125:22	43:21	early 45:22	86:16
126:15	44:8	58:14	
126:21	44:21	easier 26:16	
127:1	45:1		
127:16	46:10 49:12		

87:1 118:21	72:9	112:24	ensuring 57:5
122:19	72:14 73:17	employment	entered 122:4
123:1	74:3 74:7	7:16 7:19	entirely
125:10	75:4	7:21	102:7
email 33:4	75:17 75:21	encourage	102:18
37:12	75:24 76:10	23:14 27:22	117:13
44:1 44:8	76:10 76:19	58:5	entirety
48:14 48:16	77:17 77:18	73:25 74:18	122:13
48:18 48:22	78:3 79:8	132:11	entities
49:5 49:8	79:15	encouraged	28:18
49:9	82:3	59:25	entitled
49:11 49:17	82:10 82:11	75:1 76:4	9:5 33:19
49:21	82:15 82:22	132:20	entity 15:3
50:3 50:9	83:2	132:25	equal 21:6
50:16 50:19	88:11 88:13	133:7	38:24 41:15
51:5 51:6	118:13	enforce 65:13	Erin 134:11
51:24	emailed 51:19	84:16 84:22	error 61:22
52:2 52:3	54:21 54:25	117:7	61:24
52:6 52:8	55:1 55:8	enforced 10:8	especially
52:18	56:22	123:20	25:24 77:25
53:5 53:7	57:2 78:6	enforcement	estimate
53:19	78:11	38:4 38:7	53:10 85:20
54:2	emailing 17:8	64:20 72:16	ethnicity
54:20	emails	83:21	65:23
55:4	17:13 52:23	85:2 112:9	evenhanded
55:11 55:23	53:24 55:14	enforcing	72:21 73:2
57:21	57:17 60:18	67:3 67:4	Event 12:9
58:1	60:19	72:20 73:1	events 16:7
58:11	61:3 61:8	engineering	17:9 17:11
59:7	65:4 65:8	23:9	everyone
59:16	65:10	56:16 75:25	23:13 40:24
60:4	66:5	76:3 78:5	95:12
60:15 60:15	67:10	90:2	evidence
61:15 61:23	77:2 77:5	132:4	103:15
62:7	77:10 77:12	132:22	119:20
62:16 63:18	78:15 78:21	Enrichment	120:3 120:6
64:13 64:16	79:19 79:23	32:8	120:8
64:19 65:16	79:23 80:12	ensure	
65:19 65:21	86:11 86:14	51:16	
66:1	86:17	120:15	
66:22	embrace 42:6		
67:1	employed 7:10		
67:13 71:13			

120:11	107:10	112:14	expert 85:3
exact 46:5	exemption	112:17	explaining
85:17 86:10	103:17	112:18	64:1
99:23	113:8	117:16	explicit
EXAMINATION	118:10	124:16	118:10
6:9 130:13	119:8	124:17	explore 30:6
examined 6:8	119:12	124:18	express
example 21:17	119:15	124:19	116:13
21:25	119:18	124:20	116:20
107:21	120:14	124:21	116:22
examples	120:20	124:25	117:1 117:4
22:25 28:11	121:24	126:16	extended
127:23	exemptions	126:17	83:10 83:16
exceptions	107:7 112:4	126:18	external
107:2	exhibit	126:22	40:24 41:4
110:13	8:13 9:2	127:21	<hr/>
exclude	9:6 43:20	129:18	F
109:17	44:2 48:9	130:15	face 33:4
115:6	57:24	131:2	33:5 33:6
115:24	60:4 68:4	131:16	33:7
116:5	68:8	131:17	faced 24:24
excluded	68:12	131:18	fact 23:2
42:16 94:15	70:3 70:4	131:20	130:22
94:18 94:25	70:6	131:22	134:12
96:9	73:11 73:12	131:25	factored
96:16	73:13 73:14	132:2	108:4
115:12	74:5 81:6	133:14	facts 14:5
115:13	81:8	135:13	14:9
115:13	81:10	Exhibits 88:4	failed 11:6
120:3	88:9	exist 107:17	127:19
exclusion	88:24 89:10	ex-officio	127:20
69:3	89:14 89:14	19:22	failing 10:24
96:11 96:18	89:21 89:22	expectations	41:6 85:24
96:23	90:10	66:18	fair 26:14
exclusionary	91:4 91:5	expecting	28:6
94:20	105:23	82:25	39:24
executive	108:8 108:8	experience	40:5
71:1	108:9	29:24 29:25	45:10
exempt 119:21	108:10	30:8 54:8	132:24
exempted	108:12	experiences	
	108:13	15:17 80:11	
	108:18		

134:14	136:5	7:24	26:11 107:4
fairly	136:10	11:13 12:15	116:22
32:24 131:9	feedback	14:4 19:2	formal 20:25
fairs 17:5	76:25 80:18	24:1 24:4	forth 86:11
25:19 25:22	81:18 81:21	24:6 24:6	founded
26:8	82:11	24:7	121:20
26:20 27:13	feel 7:5 96:8	24:13 29:18	Fowler 41:6
faith 38:10	Fellowship	43:2 43:7	fraternities
66:16 66:24	49:4 49:6	43:24 51:18	14:20 14:23
70:21	58:23	58:4	14:24
93:4 93:8	female	59:18 70:22	15:6
98:14	23:11 23:15	70:24 72:19	23:22 30:20
109:21	67:22 68:23	72:25 76:10	96:23 97:15
faith-	69:10 69:12	105:4	97:20
specific	fence 18:3	106:25	107:11
97:4	field 132:22	107:15	118:7
fall 11:5	filed 34:16	116:11	119:10
25:4 25:8	35:6 43:9	116:16	120:1
25:18 25:25	98:22	129:19	120:14
51:9 71:23	106:17	130:16	120:23
familiar	files 12:11	131:1	134:3
33:18	82:20	133:18	fraternity
44:2	finalized	133:21	15:3
48:12	83:19	fit 59:12	30:23
117:13	finding 26:16	five 9:2	94:3
118:7 122:5	findings 9:25	9:9 28:24	94:21 94:25
131:25	fine 10:25	93:25	95:5
FAQ 76:11	30:25 30:25	95:1 95:6	121:4 134:8
81:13	41:8 100:8	95:15	Fraternity/ Sorority
FAQs 80:23	Finger 12:9	112:20	118:19
fashion 102:6	12:13	128:1 128:8	free 7:5
faster 53:21	41:3 44:17	fix 81:2	116:13
February	finish 6:22	flagged 42:20	116:19
44:10 44:12	45:19	flourish	freedom
45:23 122:1	55:5 55:6	32:11	116:11
federal 36:25	finished	focused 31:6	frequently
37:18 38:15	45:24	folks 77:6	32:24
83:9	first 6:7	forgot 26:1	fresh 26:4
102:3 122:2		53:4	
		form 20:19	

Friday 48:19 54:6	General's 106:14	29:6 29:11 29:13	41:8
friend 24:9 29:18 30:4	George 8:14 68:5 108:15	49:3 49:5 50:10	greater 94:25
friends 116:20	getting 10:19 16:8	51:5 51:20 52:10	Greek 23:19 25:4
Frisbee 128:25	27:14 31:17 37:11	58:22 59:9 61:8	28:10 28:20 28:23 95:17
front 14:6 28:4 106:20	53:7 58:14 82:22	61:19 66:23 67:4	119:22
FSL 30:19 30:22	given 54:23 76:8	72:15 85:15 87:1	ground 6:19
full 6:13 107:15	76:22 77:13	87:10 87:25 91:14	group 13:13 15:8
111:9	gives 69:2	93:2 93:7 93:23	15:23 15:25 16:2
functioning 16:5 100:6	giving 15:18 64:23	95:2 95:7 95:12 96:10	16:24 16:25 18:14 18:21
<hr/> G <hr/>	goals 16:1 17:2	96:19 97:2	19:24 21:1
gain 35:21 36:1	God 114:7	97:22 98:11 98:13 98:19	21:11 21:14 22:10
gained 36:5	gone 83:18 121:13	98:22 100:1 100:6	24:2 26:18 27:10
gather 100:18	google 31:1	101:11 103:16	27:23 28:13 28:20 28:25
geared 16:16	gosh 121:5	104:14 104:19	29:14 29:16 30:4
gears 118:6	gotten 55:8 61:14 72:9	114:6 115:14	31:12 31:13 36:22 40:11
gender 23:7	governing 16:6 47:6	120:17 123:21	43:10 43:11 45:15 54:21
genders 96:23	53:1 58:6 61:5	123:23	55:3 55:18 55:18
general 10:20 14:16 19:21	81:20 85:25 127:13	Graduates 104:10	63:11 64:4
75:2 77:22	127:13 127:20	50:19 62:10 62:15	65:12 66:15 67:14 67:21
89:6 89:16	130:20	86:7 103:8	68:23 69:7 69:9
108:24 118:20	government 20:1 20:5	Graduate's 107:7	69:11 69:14 70:21 84:17
generally 15:14	20:7	119:16	84:23 85:1
82:2 84:12	graduate 20:1	granted 107:7 119:16	89:13 91:2
		great 13:25	

91:15 92:18	38:10 38:17	117:3	happened
92:20 92:24	38:22	119:22	23:11 37:20
103:10	42:5 43:2	126:4 126:5	51:6 51:9
110:9	43:7	127:18	134:23
113:13	43:14 43:17	129:4 129:8	happy 90:5
113:17	45:14 45:17	129:9	90:11
113:24	45:20	130:23	hard 18:9
115:1 115:2	46:3 46:7	131:12	harder 105:13
115:19	52:19	133:17	105:16
115:19	53:2 53:3	134:21	105:19
115:22	53:5 53:7	136:22	harm 93:6
115:24	55:7	group's	93:9
116:2	55:11 55:13	16:1	93:17 93:20
118:18	58:5 60:1	68:22 69:3	94:23
118:23	62:1	Groups 16:5	95:9 96:1
131:2	64:14 66:17	guess 41:4	96:4
134:17	67:5	87:6	96:11 96:19
136:6	75:25 77:25	guidance	97:6
grouped	78:4 78:6	15:16	97:19
136:21	80:22 85:10	guys 90:14	100:12
groups	85:11 88:25		100:22
11:12 11:20	89:3 89:9		103:18
16:8	91:9		115:14
16:21	95:18		115:18
18:5 18:7	97:4 102:25	half 122:2	
18:8 19:7	103:4	halfway	
19:8 23:5	104:25	107:15	harmed
23:7 23:8	105:8	hall 33:7	92:24 93:13
23:10 23:11	105:14	Halls 29:10	111:2
23:13 23:19	107:10	hand 37:14	harmful 92:18
24:7	107:16	126:14	harms 98:4
24:22	107:22	handing	98:12 100:4
25:4	107:25	126:21	120:16
25:23 26:14	109:13	handled 66:6	Harreld
28:4	110:14	handling	39:7 87:21
28:10 28:14	110:19	66:10	haven't 24:24
28:20 28:21	113:7	hanging 18:2	54:21 78:25
29:1 29:5	113:10	Hanna 66:12	136:13
29:8 31:5	113:22	happen	136:17
31:11 32:10	115:6	77:14 97:21	having 6:7
36:3	115:11		17:10 25:8
36:14 38:8	116:9		
	116:22		

35:13 36:18	30:5 30:6	110:9	
37:17	40:22 44:16	110:15	I
84:1 84:2	44:17	111:19	Ibrahim-
120:2	helpful	113:8	Olin 12:7
Hawkapellas	13:1 13:5	Hubbard 18:3	I'd 121:5
56:8	13:7 17:4	human 10:8	124:7
64:16	helping 16:17	11:16 11:21	idea 27:21
65:8	17:24 40:21	13:14 22:18	66:15 70:11
65:11	41:2 76:21	24:16 33:23	ideas 30:10
67:2	helps 26:16	34:1 34:4	identificatio
67:13 68:13	27:2 27:3	34:8	n 68:9 70:7
69:22 80:13	27:8 69:8	36:20 38:16	73:15 81:11
82:12 89:25	here's	42:16 42:18	108:14
90:17 90:17	82:11 98:3	42:23	124:22
91:2	he's 49:3	47:4	126:19
128:2	115:12	47:11 47:13	131:23
129:11	hey 29:19	47:20 47:20	identified
hazing 10:22	60:10 103:8	49:10 49:20	12:16 62:23
head 47:25	Hi 58:5	50:12 50:14	83:22 94:24
121:8	highlight	51:17	identifies
health 17:4	130:18	57:6	60:16
healthy 15:23	highlighted	62:12	identify 8:18
16:4	130:23	63:3 63:5	12:10 16:24
16:21 16:25	historically	63:14 64:21	70:19
18:5 18:7	46:23	65:13 65:23	111:24
105:14	107:23	66:6	identifying
heard 24:9	hold 22:12	67:15 67:18	110:9
123:4	54:9 113:17	69:18 72:20	ideological
hearing 64:1	130:24	84:16 84:22	114:17
held 99:22	131:6	88:1	115:18
103:13	131:12	105:1 107:7	116:9
121:9	136:23	110:13	I'll 10:17
help 6:21	Homecoming	112:4 112:9	35:9
15:24 17:10	28:17 28:19	113:4 113:9	74:18
20:15 26:19	honor 120:24	114:15	135:15
28:2	host 16:7	114:20	I'm 6:12 6:19
32:11 45:11	hosting 16:7	115:8 118:9	7:4 10:11
125:6 127:3	House 110:6	136:7	10:23 19:24
helped 12:10		hypocrisy	22:2 32:6
		113:24	
		114:3	

32:13 33:10	105:7	109:12	119:1
35:22	115:23	indication	insight 20:24
36:4 41:6	IMU 17:18	13:10	instance
46:6 54:4	inaccurate	individual	17:16
58:16 60:19	90:5	12:15	110:23
60:25 61:10	inbox 78:12	78:2 116:5	114:21
68:11 72:22	inboxes 78:2	individuals	instead 6:24
79:3	include 14:20	59:6 111:21	instruct
82:14	34:4 34:7	inform 35:5	49:13 49:16
84:5 85:5	53:4	75:3 117:17	instructed
85:6	54:19	information	43:6
89:20	63:8	20:18 20:18	49:11 49:15
90:5 92:4	118:9	35:7 100:18	49:18
93:21	118:22	104:23	instruction
98:1	included	127:7 136:9	82:1
98:20 98:23	110:15	136:14	interact
99:22 100:9	118:13	136:17	32:22
100:20	118:19	informed	interaction
100:21	including	39:22 74:15	33:3 33:9
102:9 103:1	28:9 47:3	74:25 119:7	33:10 33:12
106:21	107:19	initial	33:16
112:6	inclusion	7:19 7:21	interest
114:24	127:18	19:1	26:15 91:17
117:13	incomplete	19:14 40:23	101:24
126:21	47:20	43:4	interested
130:17	inconsistent	45:19 45:24	92:15
131:15	111:12	94:18	132:22
impact 39:23	incorrect	initially	interesting
impacted	46:12 91:19	47:15	27:12
105:10	91:25	80:2 82:16	interests
impair 113:12	92:1 92:3	initiative	101:16
113:16	94:1	27:18 27:20	101:17
114:9	94:12	injunction	103:18
impaired	101:13	38:1	120:2
110:18	121:11	39:22 39:23	international
implement	121:16	40:6	31:7 31:8
123:10	126:9	83:10 83:15	interpretatio
implications	Indian 32:5	122:4	n 115:7
105:7	indicate	input 86:22	
important			
27:13 103:9			

interpreted 67:9	102:7 103:7 103:16	90:1 98:25	121:24
interpreting 63:5	104:9 104:14	99:1 99:3 99:8	<hr/> J <hr/>
interrupt 58:7	104:19 114:6	99:13 99:16 100:1 100:5	Jamal 41:5
interrupted 58:16	115:13 120:16	100:11 100:18	January 10:3
Intersection 56:20	123:21 123:23	100:21 100:25	36:10 37:1
90:3 128:5	129:21 132:12	101:6 101:12	37:19 40:12 40:23 83:22
InterVarsity 49:3 49:5	133:13	101:15 101:17	104:23 125:13
50:10 50:18	inventory 8:1	101:17	Jesus 41:5
51:4	investigation 103:7	102:3 102:4	Jewish 23:3 113:13
51:19 52:10	involved	108:20	job 20:14 76:24
55:17 58:22	14:11 26:12	112:24	join 29:16
59:9	27:1	128:2 128:8	July 85:14 118:8
60:23	34:11	135:10	June 48:19 53:3 53:7
61:8	40:9	Iowa's 101:9	54:5 55:11
61:13 61:19	40:10 42:10	isn't 132:24	56:5 57:20 58:11
62:9	43:4 44:6	134:2	59:21 59:21 60:5 60:7
62:15 66:22	44:11 86:19	issue 21:15	60:10 60:16 60:24 61:12
67:4	134:10	22:1 22:6	61:18 63:17 73:18 74:14
72:14	involvement	22:14	76:10 76:19 77:2
79:4	14:18	47:8	77:10 77:17 78:9 80:2
85:15	15:5	47:10	82:15 82:15 82:19
86:7	19:18 25:22	75:7 96:19	83:1 83:8 85:14 85:21
86:25 87:10	27:2 28:6	issues 9:24	85:22 88:14
87:25 91:14	30:19 31:23	10:21 15:21	
91:18 91:21	39:24 45:10	24:15 56:23	
93:2 93:7	81:19	I've 7:11 22:2	
93:23	involving 113:1	37:21 44:4	
95:2 95:7	Iowa 7:10	IVGCF 114:5	
95:11 96:10	8:10 8:25	IX 118:10	
96:19	12:8	119:12	
97:1	13:24 33:19	119:15	
97:22 98:10	56:10 65:22	119:18	
98:13 98:16	68:13 68:23		
98:19 98:22			
99:25 100:5			
101:11			

104:24
 118:13
 127:14
junior 29:21

 K

Kappa 121:3
Karina 82:23
Katrina
 58:5
 58:17 59:17
 62:4
 63:18 63:24
 73:19 86:12
 86:14
Kevin 48:22
kicked 104:14
Kim 59:15
kinds 28:1
 42:11 83:21
 120:16
King 60:16
 61:2 61:23
knew 50:4
knowledge
 11:18 11:22
 15:16 24:20
 36:5
 36:11 42:22
 42:25 46:24
 47:2 52:5
 57:13 57:15
 58:24 61:17
 62:20
 98:6 100:24
 107:13
 117:10
 117:17
 120:18

126:12
known 28:15
 132:5
Kristi 12:9
 41:3 44:17
Kristina
 82:16
Kummer
 48:23 48:25
Kutcher 6:2
 6:7 6:11
 6:15 9:1
 124:24
 126:21
 137:7
Kyle 41:6

 L

lack 91:17
language
 33:23
 47:9
 47:19 47:21
 50:13 50:15
 67:17 67:18
 69:1 71:4
 71:14 73:24
 74:10
 76:3
 86:10 91:22
 91:25
 92:1 92:8
 92:11 92:13
 118:13
 118:25
 119:5
larger
 28:22 89:23
largest 28:13
 28:14

last 25:3
 25:8
 60:14
 61:1 61:2
 78:18 79:16
 83:8 106:13
 108:23
 122:17
 123:21
 123:24
late 37:1
later 7:18
 41:24
Lauren 66:12
Laurynn 60:16
 61:2
law 85:6
laws 102:3
 102:3
lawsuit 34:15
 34:22
 35:5 43:9
 106:19
lead 34:21
 115:11
leader
 93:10 93:15
 93:16
 96:9 98:19
leaders 10:12
 13:23
 16:4
 22:23
 23:2 36:3
 36:15 36:18
 36:23
 38:9 42:6
 62:24
 63:2 63:9
 64:4 64:8

66:16 66:23
 70:20 74:17
 74:19
 86:8 93:4
 93:8
 98:13 99:22
 106:18
 108:19
 110:20
 110:24
 111:13
 113:22
 113:25
 114:6
 114:16
 114:22
 115:2
 115:24
 116:5
 116:10
leadership
 14:19
 15:5
 19:18 30:19
 31:23 35:15
 35:23
 62:8
 62:10 62:16
 63:7
 63:22 81:19
 86:3
 93:22
 95:1
 95:15 95:18
 96:14
 97:2
 99:18 102:8
 102:14
 104:8
 112:25
 124:4
leading
 64:9 114:11

133:1	19:20 30:23	listing	113:8
134:25	118:20	9:18 9:20	Lori 41:6
learning	134:8	44:4	lot 14:4 14:8
15:17	light 72:15	127:9	16:17 17:12
least 18:9	104:23	127:10	17:13
27:22 46:24	limited 33:16	127:11	18:8 30:2
97:14	Lin 31:18	lists 45:8	35:7
110:15	31:20 32:4	45:9	40:14
led 113:14	line 102:25	45:14 128:8	74:7
113:19	lines	128:12	94:25 105:7
113:25	102:21	128:16	loud 109:3
114:1 114:1	128:8	128:20	132:19
legal 12:1	list 44:2	128:24	Love 55:24
21:15 21:24	44:6	litigation	56:2 56:5
21:25	44:12 44:18	79:6	64:15
22:2 85:3	44:20 44:23	79:10	65:5 67:2
less 41:17	44:25	108:19	70:2
41:18	45:5	114:20	70:18
48:2 48:3	45:16 45:18	129:21	71:2
48:4 48:6	55:10 88:19	130:21	71:13
96:18 96:18	89:18 89:20	131:13	72:8
let's 8:7	89:23	135:17	72:13
21:9 55:4	90:4 90:5	little 14:2	78:6
55:5	90:18	14:12 25:20	79:20 79:23
57:25	91:3 103:21	25:20 28:13	80:12 82:13
62:2	104:3 104:5	53:21 54:10	89:19
67:24	104:6 121:3	70:9 112:18	103:22
70:8	126:8	lived 12:11	104:5 104:8
73:12	126:11	lobbying	104:13
81:4 98:4	128:2 128:5	30:10	104:18
103:10	129:12	location	109:7 109:9
103:11	129:13	26:13	109:12
108:7	129:15	long 7:9	109:16
127:23	listed 10:5	57:25	109:20
letters	10:16 10:21	117:24	110:15
13:9 13:12	11:12	longer 27:6	110:23
letting 6:21	24:5 89:9	Lord 110:6	111:12
LGBT 111:1	91:9 103:21	110:9	113:7
111:10	103:23	110:15	128:13
Life 15:4	104:2 129:9	111:19	129:19
	131:2		131:3 131:5
			135:16

136:5	70:4 70:6	122:10	95:19 96:14
136:14	73:13 73:14	135:9	121:20
136:18	81:8	meaning	132:16
136:21	81:10	35:8 39:10	men's 24:21
low 46:15	105:22	means 9:23	57:10
46:16 46:18	108:12	15:13 15:18	117:25
Lucas 19:12	108:13	18:19 35:23	118:4 121:4
30:14 30:15	108:18	36:2 85:6	128:25
Lutheran	124:20	135:5	mention 26:1
128:12	124:21	meant 15:15	mentioned
<hr/>	124:25	36:14 37:23	11:1
M	126:17	39:13	19:13 30:14
<hr/>	126:18	meet 21:22	32:20 76:11
magnitude	126:22	28:5	82:17
94:23 95:8	131:20	39:12 39:15	merits 36:18
mail 62:4	131:22	meeting 30:10	message
majors 30:7	marks 15:23	meetings 25:2	113:12
males 69:13	Marshall 41:6	30:9	114:10
managed 15:1	Martin 6:15	Melissa 33:8	114:10
management	mass 17:7	member	messaging
21:16 21:18	17:13	19:18 19:19	61:25
mandated	matter	19:21	Michelle
83:16	10:16 85:6	69:7	59:14
manner 134:16	may 15:21	76:21 87:21	middle 36:9
Marathon	24:6	95:12 95:22	90:22 90:23
28:14	54:23	members	midway 128:11
MARCH 6:4	69:7 69:9	15:4 16:2	military 66:2
mark 68:4	77:11	16:3	mind 10:23
70:3	maybe 19:9	19:23	17:2
73:12	77:9	21:7	mine 29:18
108:10	97:18 99:13	22:23 23:15	minimize 98:4
124:19	102:18	25:24 28:24	Ministry
126:16	102:19	28:25	128:12
131:18	135:14	29:3	minorities
marked 8:12	McHale 134:11	50:25	107:22
43:20 48:10	mean 8:14	76:4 82:6	108:2
57:23	26:20	82:8 109:17	109:14
68:8 68:12	27:4	132:20	109:24
	33:13 36:21	membership	
	99:25 112:6	63:6	

7:14 7:19	51:10 51:14	83:1	124:6 125:1
7:23 8:2	51:18	83:24 84:25	126:7
8:7 8:24	52:5 52:8	85:8	126:25
9:11 9:22	52:15	85:10 85:12	127:25
10:4 10:7	53:6	85:13 85:13	129:8 130:4
10:13 10:19	53:16 53:19	86:16 86:19	130:22
11:15 11:19	54:1 54:5	87:7 87:9	131:1 131:4
11:23 12:12	54:18 55:10	87:12 87:20	131:11
12:15 12:21	55:23 56:16	88:8 89:9	131:15
13:8	56:25	91:7	132:5
13:16 13:25	57:8	92:10 92:17	132:10
14:22 15:10	57:16 57:23	94:3	132:24
18:16	59:2 60:8	95:17	133:13
19:1 19:4	60:21 60:21	98:7	133:20
19:11 19:13	61:1	98:10 99:16	133:23
19:16 20:11	61:17 61:22	100:4	134:1
21:3 21:6	62:2	100:10	134:12
21:9	62:14 62:21	100:23	134:20
21:20	63:13 63:17	101:3 101:8	134:23
22:5 24:3	65:1 65:7	101:15	135:7 135:8
24:15	65:10 65:18	101:23	135:12
27:8	65:21 65:25	102:2 103:6	135:19
27:12	66:4 66:9	103:15	136:4
32:2	66:14 67:12	106:3	136:21
32:14 32:18	67:24	106:21	137:1
32:21 33:18	68:1 68:3	106:23	oldest 47:2
34:11 34:20	69:13	107:14	ones 10:13
34:24	70:1 72:2	109:1 109:4	10:24 16:21
35:3 36:4	72:8	109:5 110:1	25:1
36:25	72:18	110:18	45:15 45:18
37:8	74:5 75:3	111:6	89:14
38:24	75:6	111:19	101:20
39:2 40:1	75:10 75:17	112:8 113:6	107:12
40:8 42:4	75:21	115:21	121:1
42:22	76:2	117:3	online
43:1	76:17	117:24	123:5 123:7
43:13 43:17	77:2 77:8	118:6	open 23:13
43:25 45:12	77:15 77:20	118:12	114:3 120:1
46:14 47:14	78:20 79:15	118:17	operate 17:1
48:9	79:22	119:4	operated
48:13 49:16	80:1	120:22	46:22
50:24 51:8	80:15 81:16	122:24	
	82:10 82:15	123:9 124:3	



operating 15:20 63:4 87:3	organizations 9:25 10:9 11:3 11:5 11:9 14:17 14:19 15:15 15:18 16:13 17:22 20:17 22:8 28:9 30:13 31:9 34:3 36:17 40:11 44:5 45:6 45:10 47:1 49:19 52:24 76:23 77:11 77:13 80:16 84:11 88:19 88:22 90:7 103:21 107:8 112:11 112:23 114:16 119:10 125:24 125:24 127:10 130:19 134:13	7:25 origin 113:3 others 32:7 78:2 82:6 121:5 outcome 131:12 outcomes 9:25 101:1 outlined 16:6 71:3 outreach 132:23 outside 30:3 oversight 14:17 15:6 107:19 <hr/> P <hr/> p.m 48:20 54:5 73:18 75:19 75:22 137:6 page 9:5 43:24 43:24 58:4 59:18 60:14 60:15 61:2 62:2 70:22 70:24 71:6 74:8 81:16 90:22 92:14 92:19 106:9 106:13 106:20 106:25 107:14 108:23 109:1 109:6	110:4 110:5 111:5 128:1 128:4 128:7 128:7 128:11 128:15 128:19 128:23 129:19 130:16 131:1 pages 9:4 91:8 91:8 91:12 91:15 92:8 92:14 106:7 106:23 parable 116:4 paragraph 107:1 107:15 109:2 109:11 110:5 Park 18:3 participate 29:13 40:5 69:13 69:15 94:20 95:5 95:7 participation 111:9 particular 16:20 21:10 24:3 32:9 54:14 particularize d 103:7 particularly
opinion 38:12			
opportunities 96:22			
opportunity 25:23 28:4			
opposed 95:6			
option 77:18			
order 37:1 37:4 70:25 104:24 104:24			
org 20:24 46:25			
organization 9:19 15:11 15:14 16:25 17:4 18:17 18:20 18:24 22:3 22:12 23:1 23:17 25:19 27:15 28:15 28:17 28:23 29:22 30:8 30:16 36:6 51:16 77:1 81:25 93:10 93:12 98:25 101:9 104:1 128:9	organization' s 61:5 Organizations 33:20 orgs 54:25 127:11 OrgSync 9:20 77:16 91:8 Orientation		

54:9 113:22	52:16 84:6	88:25	99:4 99:9
parties 14:6	perhaps	89:3	99:14 99:17
partners	133:18	95:14	100:21
28:17	permanent	136:23	117:14
Passover	122:4	plaintiffs	policy
113:13	permissible	6:12 79:5	10:10 21:15
past 23:24	69:17 69:20	platform	22:5 22:6
60:15 61:3	74:23	114:23	22:14 24:11
Paul 30:17	75:1 109:21	play 115:23	33:19 33:22
32:19 32:20	136:7	please 6:13	34:2 34:3
33:14 41:3	permit 119:17	7:5 12:2	35:9
Payan 41:5	permitted	70:3 73:6	35:10 35:14
pending	23:10 38:20	106:24	35:18 35:22
129:21	100:1	110:4	36:2
130:21	101:11	124:18	36:14 36:16
131:12	107:16	124:24	38:21
135:16	112:3	126:15	73:1 82:2
people 24:9	person 8:1	126:16	99:20 101:6
26:10 26:15	46:23	126:23	101:9
28:2	114:11	131:19	102:24
28:16	134:9	132:19	107:18
30:2 30:6	personal	pledge 94:6	113:9
41:19 45:11	77:12	plug 134:7	123:19
45:13	personally	point 34:21	political
53:6	18:9	35:6	114:17
60:22	50:18	35:21	115:18
61:6 69:3	123:16	36:1	115:21
77:15 92:19	perspective	37:17	116:9
94:6	115:10	40:8	population
94:14	Phi 121:4	41:21 41:24	100:13
95:5 111:24	phone 33:4	46:22	portion 41:22
116:22	75:4 77:10	47:1 51:2	41:23
percent 94:10	phonetic	54:20 57:18	122:17
94:17 94:18	66:13 66:13	57:19 59:24	portions
percentage	pick 27:18	71:20 84:14	122:16
41:15	27:20 27:21	84:20	position
performance	27:22 28:2	85:1 85:9	63:15 63:19
27:9	placed 38:1	118:16	64:2
performed		130:17	74:16 75:16
		policies 47:3	109:20
		98:25	110:2

115:25	preliminary	123:8 134:9	22:24 36:19
117:22	83:9	problem	63:7 109:17
119:25	preparation	47:9	115:9
positions	9:15 12:3	47:12	116:16
93:22	13:2	81:1	provide 15:15
94:4	13:17 13:20	98:18 120:5	16:9
94:14 94:19	64:22	121:18	20:24
94:19	prepare 125:6	problems	22:9 28:3
95:2 95:4	127:3 127:7	72:19	76:25 80:21
95:15 95:22	prepared 9:11	procedures	81:21
95:23 96:13	125:8	46:21	107:22
112:25	125:12	process	108:1
positon 75:13	125:13	11:6 19:1	110:14
possession	125:15	23:24 26:10	111:2
25:15	127:5	27:14	111:17
possibility	present 39:19	40:9	111:25
74:20	presentations	40:10 45:12	113:9
potentially	15:19	55:5 55:6	provided
17:6	president	76:17 84:8	110:19
17:12	29:21	processed	134:6
24:5	39:7	24:25	provides
53:13 53:16	58:21 58:25	produce 78:16	16:12 17:17
61:24 73:24	87:20	78:23 79:2	110:9
95:10 96:2	prevent	produced	110:13
poverty	114:16	11:23 55:21	providing
115:23	114:21	65:3	45:1 109:13
115:25	115:1	producing	136:6
116:3 116:6	previous 25:2	64:23 101:1	prudent
prayer 113:25	previously	professional	131:11
114:10	9:9	16:10	Psi 121:3
prayers 64:9	primarily	22:9 30:7	published
praying 114:7	33:3	121:3	94:9
preamble	principles	properly	pull 67:24
68:15 68:21	121:20	132:11	punch 90:24
69:10	prior 7:12	proposal	purpose 42:17
precisely	44:12	73:23	111:12
119:4	52:9 98:16	proposed	purposes 42:7
preference	probably	74:11 74:17	42:11 42:13
113:1		protected	42:15 107:3

112:4	135:12	24:19	53:9 56:1
pursuant	quite 97:19	26:3 32:9	56:3 56:4
123:14	quote 109:7	46:11 54:14	56:6 56:9
123:17		59:3 59:5	56:11 56:13
putting	<hr/>	72:8	56:15 56:17
30:9 92:7	R	82:20	56:19 56:21
<hr/>	race 65:22	89:1 89:2	62:25 64:18
Q	66:18 113:2	90:4	65:4 65:6
<hr/>	raise 72:18	91:18 91:24	65:7 65:9
quantify	raises 22:17	94:1	65:14 65:15
93:17	Ramadan	94:11	65:19 65:21
quantifying	113:18	96:3 96:6	65:25 67:10
93:20	ran 75:15	96:17	67:23 71:16
queer	range 28:24	101:13	72:4 72:6
111:20	rate 46:14	104:12	74:3 75:5
111:24	46:15 46:16	104:17	75:9 76:1
question	46:17	112:15	76:13 79:21
7:3 7:4	rather 105:23	116:8 118:3	79:25
35:24	rattle 121:2	118:5	84:1 84:2
46:6 58:8	reach 24:7	118:12	92:9
81:17	76:23	121:10	99:13 99:16
96:5	reached	121:15	102:22
97:10	24:8 61:7	126:7 129:3	119:3 119:6
103:25	reading	reasonable	132:7
104:16	50:4	114:5	133:15
125:18	63:14 92:2	reasons 11:16	133:16
132:10	reads 69:10	11:21 14:10	135:14
133:2 133:4	ready 48:12	21:13 107:2	135:15
135:2	88:7	107:18	receive 17:12
135:15	real 67:25	107:20	39:9
questions	81:4 135:12	124:3	72:14
130:11	realize 28:16	Rec 24:1	85:2 136:9
132:8	really	recall	received
132:14	16:21 21:13	22:15 35:12	55:11
133:17	27:22 53:17	35:13 35:16	74:9
134:1	60:10 103:9	35:17 35:20	74:22
134:20	reason 24:3	37:10 37:11	82:1 82:3
135:14		37:17 37:21	136:13
135:23		41:1	136:17
quick 67:25		43:19 44:24	recess 73:8
81:5 124:12		45:2	124:10
		48:18 50:20	recipient

48:22	referring	15:10	131:12
recognize	62:15 62:18	23:6	133:17
8:16	108:1	42:18 62:11	134:17
48:16 59:15	regard 110:25	64:20	136:22
62:8	111:1 113:2	79:6 79:9	remained
65:11 70:15	regarding	79:17 99:24	104:13
88:9 120:22	35:14	relates 35:15	104:19
125:2 127:1	37:2 43:9	115:21	remember
recognized	61:4 66:5	relating	10:24
63:22	69:2 69:2	86:11	22:4 25:1
121:15	73:23 75:11	relation	36:12 39:18
recollection	Regents 87:21	36:19	41:6 46:5
51:24 80:11	register	relationship	81:3
recommendatio	18:23 21:14	59:8	82:22 82:23
n 20:21	24:8	religion	83:25 84:13
20:23 20:25	26:12 84:11	113:2	86:4
record 6:14	registered	religious	86:10 121:6
8:18 31:1	14:17 16:13	36:21 36:22	132:14
73:7 73:9	21:2	36:23	remembering
124:9	21:11 21:21	38:9	25:7
124:11	24:17 30:13	38:10	remove 71:14
137:5	80:15 98:24	43:2 43:7	removed
Recreation	101:9	43:9	129:20
66:7	104:13	43:10 43:17	renewed 83:9
Recreational	104:19	45:14 45:17	repeat 7:5
15:7	112:10	62:11 62:15	35:24 38:18
19:23 57:1	112:23	64:11 70:21	66:20 84:18
recruit	116:25	71:11 84:16	96:5
16:2 16:3	125:23	84:22	97:17 102:9
25:23	registration	85:1	103:1 111:3
105:17	10:9	85:10 102:8	112:12
recruitment	20:19	102:14	114:18
17:5 26:8	21:4	104:25	125:17
recurring	23:24 33:19	110:25	133:4 135:2
22:6	reject 87:9	113:17	136:16
redirect	relate 99:17	113:21	rephrase
135:24	related	113:24	91:20
references	10:8	115:19	Reply 108:20
34:1	10:22 11:16	116:2 116:3	reported
	11:20 13:13	116:6 124:4	86:25
		130:19	

REPORTER 70:4	requirements	rest 43:15	120:10
73:9	62:8	43:16 113:3	125:25
73:13	62:16 63:23	restart 19:10	126:2 126:6
81:8	86:3 97:3	restriction	127:11
108:9	97:5	62:10	129:6
108:12	102:8	67:3 95:14	129:21
124:9	102:14	restrictions	130:16
124:11	104:8 124:4	65:22 66:2	130:20
124:17	requires 34:3	resumed 7:17	131:5
124:20	34:7 70:20	retention	133:20
126:17	requiring	27:3 27:4	134:4 134:6
131:17	42:6 63:2	27:5	134:10
131:20	63:8 114:16	review 9:14	134:17
137:4	114:22	9:17	134:18
representativ	115:2	13:19 18:17	reviewed 9:18
es 19:25	reread 90:7	18:20	9:20 11:1
20:8	reregister	19:6	11:2
represented	11:6 127:19	19:14 20:15	13:22
59:2	reregistered	22:4	39:2
request 33:17	98:11	23:18 24:12	41:25 43:14
79:5 79:12	127:12	36:6 37:4	43:15 43:16
requested	reregistratio	40:9	43:18 47:15
91:16	n 19:5 19:7	40:10 40:15	49:25 50:18
127:19	reserve	40:16 40:23	51:4
require 66:23	105:11	41:10 41:21	76:20 77:21
required 8:19	Residence	42:5 43:4	79:2
25:4	29:10	45:12 45:19	79:24
36:17 57:10	resistance	45:24	84:1 84:2
86:4 86:8	106:11	46:3	89:6
88:2 110:20	responding	46:25 47:23	89:16 120:4
110:24	75:21	49:21 50:11	120:7 122:7
111:23	response	51:2 51:6	122:9
113:25	54:11 54:13	51:14	122:20
119:17	76:19	60:2 67:9	127:17
132:20	responsible	67:16 71:19	133:18
132:25	19:4 64:8	71:22 76:25	136:4
133:8	responsive	78:15 83:24	reviewers
133:10	79:22	84:7 87:6	43:2
requirement		88:6 89:7	reviewing
62:24 66:17		89:10 108:4	19:4 72:4
		120:8	72:6
			76:18 81:20

reviews
 47:5 134:12
rights 10:8
 11:17 11:21
 13:14 22:18
 24:16 33:23
 34:1 34:4
 34:8
 36:20 38:16
 42:16 42:19
 42:24
 47:4
 47:11 47:13
 47:20 47:21
 49:10 49:20
 50:12 50:14
 51:17
 57:7
 62:12
 63:3 63:5
 63:14 64:21
 65:13 65:23
 66:6
 67:15 67:18
 69:18 72:20
 84:16 84:22
 88:1
 105:1 107:7
 110:13
 112:4
 112:10
 113:4 113:9
 114:15
 114:21
 115:8 118:9
 136:7
risk 21:16
 21:17 21:24
 21:25 22:2
role 7:11
 7:17 7:23
 7:24 8:4

14:16 34:18
 40:13 40:14
 46:23
 115:23
room 29:19
rough 85:20
roughly 46:8
route 100:25
RSO 35:9
 35:14 35:22
 35:23
 36:2 81:20
RSOs 107:17
rule 8:21
 103:3
ruled 83:14
rules 6:19
 131:9
ruling
 37:18 37:19
 37:20 37:23
 38:3
 38:20
 39:3
 39:10 39:13
 72:15 83:11
 83:20 83:22
 83:24
 84:7
 84:11
 85:4 85:6
 122:5
 123:11
 123:14
 123:17
 131:8
run 22:16
 75:12
running 30:8

_____ S _____
safe 107:22
 108:1
 109:13
 109:23
 110:10
 110:14
 110:19
 111:2
 111:17
 111:25
 112:5 113:9
 136:6
safety 21:22
Samaritan
 116:4
sanctioning
 13:9
saw 13:13
 82:21
 83:1
 91:22 91:25
Scholars 32:5
school 27:5
 27:6 29:11
Schrock 58:18
 74:11 74:15
 82:16
Schrock's
 73:23
science 56:16
 75:25
 76:2 78:5
 90:2
 132:3
 132:22
 132:23
search
 52:12 52:16

64:19
searched 52:8
 65:3
second
 10:25 12:10
 43:23 43:24
 60:15
 61:1 68:2
 70:23 70:25
 81:16
 88:6
 94:24
 96:7
 109:1 109:2
secretary
 7:13 7:17
seeing 65:4
 82:22 112:7
seem 46:14
 95:8
 95:25
 121:14
seems 22:10
 46:16 59:16
 109:12
seen 9:8 22:2
 22:21 22:22
 23:5 23:6
 44:4 125:4
select
 22:23
 23:2
 36:17
 38:9 93:8
 98:13
 110:20
 116:9
selected 93:3
selection
 35:15 35:23

36:3	77:10	66:16 66:23	Sikh 128:16
36:14 99:18	78:7 80:1	70:20 90:10	similar 16:11
112:25	sentence	shared 78:2	45:14 64:13
selective	70:25	Shivers	67:1
38:4 38:6	sentences	33:8 39:5	75:24
72:16 83:21	6:22	43:21 49:12	133:14
121:19	separate 15:3	54:15	sincere 64:10
selectively	23:20 126:4	55:2	sincerely
84:15 84:21	134:6	57:25	114:7
send 49:11	separated	68:7	single 102:24
49:17	134:3	87:15	102:24
50:9	134:13	88:5 99:3	103:3
53:19 54:24	separating	99:7	SistaSpeak
64:13 64:16	134:2	short 124:7	128:16
67:1	September	showing 68:11	sisterhood
67:13 71:13	7:15 7:20	shown 27:11	121:21
75:24 77:12	68:19	Shu 59:14	sit 19:24
sending	service	Shuhui	104:18
24:1	22:9 66:2	31:18 31:20	104:22
48:18	120:24	sidewalks	113:7 131:4
50:3 50:5	121:10	18:2	site 77:16
51:24	121:24	Sigma 121:7	sits 19:22
52:6 56:1	Services 7:25	121:9	sitting
57:16	12:9 15:8	121:14	101:21
65:7	19:24	121:19	situation
65:16 65:20	24:1 57:1	sign 26:11	103:8
65:25	seven 128:7	71:1	117:11
66:5 80:12	129:11	signed 106:14	situations
sense 21:20	several	108:24	22:16 23:11
46:17	24:7	significance	six 128:4
64:8	28:18 40:22	130:18	size 28:22
64:10 96:10	75:7 95:4	significant	28:24
sent 51:7	121:5	21:16	skim 122:16
52:2 52:3	sex 66:18	95:8 96:1	skimmed
52:18 53:24	69:3	96:4 100:12	122:14
54:2	69:19 94:15	significantly	sky 21:19
55:15 55:23	94:20 95:22	114:9	slower
56:4 56:7	96:17 117:8	signs 18:2	
56:10	share 64:4		
61:2 65:4			
67:10 75:19			

54:10 54:12	95:1 95:6	12:6 13:16	117:13
smaller 28:22	121:10	speaking 12:1	117:16
social	121:15	15:14 16:1	117:22
14:20 14:22	121:24	specific 20:8	117:25
14:23	134:8	26:18 31:12	118:4 118:6
15:6 107:3	sorry 10:11	43:13 45:15	spring 11:4
somebody	31:8	45:18 59:20	25:25
31:13	33:10 35:22	93:11	staff 15:4
someone 22:17	46:6 58:7	101:16	15:8
24:16 42:16	58:16 68:16	103:15	18:21 19:17
47:16	72:22 89:20	135:15	19:18 19:19
69:6 69:8	92:4	specifically	19:21 30:10
87:1 93:9	99:22 100:7	30:13 30:20	30:12 30:19
sometime 7:15	102:9 103:1	31:6	31:5
7:16	104:15	35:19	31:10 31:16
44:11 45:22	106:21	41:1	31:24 40:22
51:5	112:17	51:20	57:1
85:14 118:8	125:17	61:7 133:7	76:21 77:11
somewhat	sort 16:22	specified	77:19
27:19	102:21	50:16	78:1 118:20
sophomore	103:6	Spectrum	134:8
29:20	136:23	56:12 82:13	stamped 92:15
SORC 25:2	sorts 14:11	90:1	standard
sororities	sound 42:7	spent 19:9	53:22 92:13
14:21 14:24	68:22 69:10	spite 107:17	standardized
15:7	space	split 20:13	61:25
23:22 30:21	105:11	sport 14:21	stands 30:22
96:24 97:15	109:23	14:23 14:24	start 18:24
97:20	110:19	15:9	22:11
107:11	111:2	23:19 23:23	58:1 58:14
118:7	111:17	24:2	started
119:10	111:20	24:12 24:16	7:20 7:22
120:1	112:1 113:9	24:21 24:25	8:4 25:8
120:15	136:6	28:9	36:5 36:9
120:23	spaces 107:22	56:23	starting 7:15
134:3	108:2	57:9 57:9	23:7 40:9
sorority 15:4	109:13	57:11	68:6
30:23	110:10	66:5	state 63:1
94:3 94:21	110:14	66:12 117:8	98:25 100:1
	112:5	117:11	100:5
	speak 12:3		

100:11	11:2 12:8	66:15 80:15	120:2
100:19	12:18 13:13	81:19 84:11	studies
100:25	14:17 14:18	84:17 84:23	27:2
101:6	15:2 15:5	85:1	27:11
101:17	15:11 15:14	85:10	64:9 100:14
115:22	16:13	90:1	100:22
stated 114:19	17:4 17:5	92:18 94:17	114:1
statement	18:17 18:20	96:8	subject 102:2
71:2 71:2	18:24 19:17	96:10 98:17	submit 60:1
71:10 71:11	19:19 19:20	98:24 99:17	80:24 80:25
109:21	20:1 20:5	100:12	85:24
112:22	20:7 22:3	101:9	127:20
State's	22:8 23:1	102:25	133:13
99:4 99:9	23:5	103:3 105:7	submitted
99:14 99:16	23:17 25:19	105:14	22:17
100:21	25:22 26:19	107:8	58:6
status 66:2	27:10 27:15	112:11	76:18 80:16
66:19	27:22 27:23	112:23	82:18
89:1 89:4	28:9	115:11	86:2 123:23
stay 19:8	28:14 28:17	115:13	123:24
27:5	29:5 29:6	115:15	127:12
step 96:7	29:8	127:9 128:9	subscribe
steps	29:14 29:16	132:21	73:25 93:11
123:10	30:13 30:16	students	subsection
123:16	30:18	15:17 16:11	132:17
stopped	31:8	17:9	substance
125:25	31:22	17:12 17:14	74:24
127:11	32:6	17:19 18:21	substantive
129:20	33:20	19:13	127:15
130:20	34:3	20:2	success
stretch 10:2	35:15 35:23	22:12 22:22	16:9 28:12
strongly	36:3 36:6	23:25 25:24	successful
73:25 74:18	36:14 36:17	26:17 26:19	28:8
74:25 99:22	36:22 38:17	26:23	suggest
struggling	38:22 39:24	27:1 31:6	136:10
15:21	40:10	31:7 32:5	suggestions
student	45:6 46:3	54:10 91:17	75:10
7:22 9:19	46:7	92:15 92:25	summer 8:3
9:25 10:9	46:25 49:19	96:16	54:8 83:8
	52:19 52:24	105:11	
	54:11 54:12	105:17	
	56:14 63:11	113:1	
	64:4	116:13	

103:23		testified 6:8	119:25
104:2 104:7	<u>T</u>	46:10 99:8	throughout
105:20	Tabitha 41:5	testify	93:4
123:21	talk 12:2	9:11 112:16	throw 28:19
123:24	13:25 14:14	117:16	THURSDAY 6:4
129:6	15:13 18:19	text 49:21	tight 8:14
supervises	25:18 88:7	50:4 91:7	timeframe
32:16	talked	91:11 91:15	35:11 35:14
supervisor	12:22 12:25	Thank 6:16	71:24 88:15
30:17 32:17	16:18 50:25	26:7 52:3	timestamp
32:18 35:1	55:2	70:5	48:19
support 14:16	61:12 64:15	70:10 70:14	Tippie 22:10
15:16 16:10	78:4 122:3	81:9 131:21	title
107:3	talking	137:4	118:10
107:20	14:8	there's 9:5	118:10
111:20	17:11 23:20	16:23 46:23	119:12
sure 6:19 7:6	27:24 35:10	53:22	119:15
9:24	58:3	55:3	119:18
15:19 18:20	71:25 81:14	80:25 81:17	121:24
19:25 20:16	90:19 97:13	97:14	today 8:8
22:2 22:8	110:6	101:20	8:20 9:12
25:22	119:24	Theta 121:7	14:8
26:5	126:3	121:9	64:22
28:12	talks 111:7	121:14	101:21
31:3 32:6	Tamplin 59:14	121:19	104:13
32:13 32:16	target 134:17	they'll 27:5	104:18
36:16	targeted	they're 16:25	104:22
55:4	17:20	19:2	112:16
59:12 73:22	tea 19:24	20:16 21:10	113:7
80:22 97:3	team 31:19	21:12 27:10	117:21
switched	50:25	73:22 90:12	131:5 132:7
106:4	Technically	101:25	today's
Switching	7:21	106:5	9:15 12:3
118:6	temporary	119:16	14:2
sworn 6:7	7:13 7:17	they've 24:9	tools 18:4
Symphonia	terminology	thousand 95:4	top 9:6 47:25
121:4	99:23	thousands	58:1 58:1
system 100:11	terms 28:21	94:19 95:23	62:3
120:13	38:6	95:23 96:13	70:23 73:17

106:9	69:19 85:11	36:13 36:16	97:5 100:17
106:24	102:19	37:22 37:25	100:20
110:5 121:8	134:13	38:14 38:19	101:15
topics 9:2	typical 22:14	61:11 61:16	102:3
9:8	typically	83:14 83:15	102:23
total 43:15	22:16 22:19	84:14 84:20	103:2
touched 25:19	23:22	85:7 85:9	103:16
toward 16:16	33:6 92:16	88:1	106:18
towards 90:22	typing	110:1 113:6	107:6
trail 74:7	65:16 65:19	understood	107:20
training 39:9	65:21	63:25	108:1
84:6 84:10	<hr/>	unequal	108:20
transition	U	38:8	110:8
16:4	UDems 114:21	38:21 85:2	110:12
travel 16:9	UI 56:12	uneven 38:7	112:3
treat 85:10	56:18	38:16	112:16
treated	66:1	unfortunately	112:24
104:25	82:13	21:23	114:14
trial 83:19	90:1 90:3	unh-unh	114:19
true 134:2	Ultimate	6:25 7:1	115:1 115:5
try 26:22	128:25	university	115:17
97:5 100:17	unacceptable	7:10 7:13	116:8 117:1
trying	101:1	7:20 7:22	117:7
19:24 97:25	unaware 61:13	7:24 8:9	117:15
98:4	unclear 58:8	8:25 12:8	118:3 118:8
turn 9:4 71:6	undergrad	13:23 14:15	119:7
109:1	29:6 29:9	16:12 17:17	119:17
turned 79:2	undergraduate	18:22 25:14	119:21
Turning	20:1 94:10	28:18 31:11	120:13
107:14	undermine	33:19	120:19
turnover 16:4	111:16	38:2 42:4	120:22
two-week	111:25	43:1	135:9 136:5
53:20	understand	46:22 47:16	136:10
type 97:6	7:3 8:7	59:8	university's
types 10:20	131:8	72:19 72:25	34:12 63:15
10:20 32:10	133:23	73:22 74:21	63:19
	understanding	75:18 84:15	64:2
	7:7 35:22	84:21 85:15	69:17 74:16
	36:2 36:4	93:3 94:4	75:13 75:16
		94:7 94:9	107:21
		96:25	109:19
			110:2 112:8
			117:21

120:2	veteran 66:18	63:13 67:11	24:7 47:1
121:13	veterans	67:18 69:21	54:20
121:18	56:18	69:21	whatever 26:4
123:19	66:1 66:2	77:9	82:20
unreasonable	90:3 128:20	82:21 86:16	whereas 95:17
64:3 64:6	via 33:4 33:4	89:13 104:5	100:2
untrue 114:2	37:11	118:13	WHEREUPON
upcoming	75:4 86:14	129:13	68:8 70:6
39:24	victims	129:25	73:8
update 47:5	107:23	ways 16:5	73:14 81:10
51:20	view 126:4	30:1	108:13
61:4 61:13	135:8	webpage 91:21	124:10
updated	views	website	124:21
83:2 118:9	116:13	24:6 91:8	126:18
updating	116:20	104:2	131:22
61:19	116:23	121:14	137:6
upload 77:16	117:1 117:4	121:19	whether 18:23
upon 118:15	violate 42:23	123:6	20:22 21:14
upper 29:2	63:3 65:23	134:21	37:21 59:20
up-to-date	violated	we'd 54:25	75:11
47:10 47:13	105:4	week 28:19	77:1
50:12	violations	weekly	82:24
usual 53:21	13:14	32:25 33:2	132:11
usually 33:17	107:18	weeks 54:3	whole 20:7
utilizing	Visser	79:13 79:16	35:7
16:22	19:12 30:15	80:8	who's 19:4
<hr/>	voicemails	welcome 111:9	26:13 54:2
<hr/>	61:3 61:9	we'll 13:25	Wiggins 41:5
V	vote 21:6	14:8	willing
vacation	VP's 19:20	23:25 67:25	115:17
58:15	<hr/>	81:1 92:6	winter 25:19
varies 33:5	W	124:8	WISE 132:5
33:6	walk 90:5	we're 7:7	132:8
variety	92:6	24:9	132:11
107:18	Wan 59:14	59:18 90:18	133:11
verbal 6:24	wasn't	98:4 100:25	wish 16:3
version 47:11	50:21 55:3	103:9 124:9	62:8
versus 108:19		137:4	63:22 65:11
		we've 22:22	witness 8:8

8:9 90:25	72:13	Yoonwei 59:15	
112:9 133:4	78:6	you'll 14:3	
135:2	79:20 79:23	60:14 80:24	
woman 69:8	80:12 82:13	yourself	
132:21	89:19	49:22 86:20	
133:10	103:22	97:11 109:3	
women 56:16	104:5 104:8	you've 7:9	
75:25	104:13	23:5	
76:2 76:4	104:18	24:17 24:25	
78:5 90:2	109:7 109:9	43:23	
132:3	109:12	79:1	
women's 24:22	109:16	79:15	
57:11	109:20	101:23	
117:25	110:15	112:15	
118:4	110:23	117:24	
128:25	111:12		
work 26:9	113:7		
30:12 30:20	128:13		
31:22 32:14	129:20		
49:18 75:12	131:3 131:5		
76:20	135:16		
117:12	136:6		
worked 6:20	136:14		
7:12 7:25	136:18		
40:24	136:21		
working 20:16	worship		
22:3	64:9 114:2		
32:10 77:25	written 98:2		
works 12:9	wrong 31:17		
23:24 31:13	59:4 136:11		
31:18			
33:7	_____		
55:24	Y		
56:2 56:5	Yep 127:22		
64:15	yesterday		
65:5 67:2	8:13 68:7		
70:2	99:8 105:22		
70:18	yesterday's		
71:3	43:21 48:10		
71:13 72:8	57:24 88:5		
	yet 54:22		

Constitution of The Iowa Hawkapellas

The Iowa Hawkapellas was established as a non-academic student organization on the campus of the University of Iowa in 2008. We, the members of The Iowa Hawkapellas, enact and approve this constitution to further develop the group's potential, ensure group union, and to provide a solid foundation from which The Iowa Hawkapellas can develop its further interest and aspirations.

September 2, 2008

Article I - Preamble

The group's aim is to bring a sound of an all-female a capella group to Iowa and to help showcase the talents of the members of the group. However, it is to be noted that The Iowa Hawkapellas is a group effort and can only function well as a single unit.

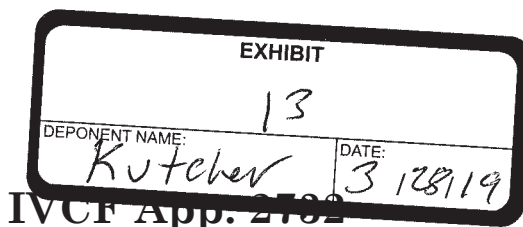
Article II - Membership

Members must actively make a positive contribution to the group. All members are also expected to be on time to all meetings and rehearsals, Failure to do so will result in possible disciplinary actions, depending on the circumstances, formality of the meeting, and advanced knowledge of said meeting/rehearsal.

- A. The maximum number of members in The Iowa Hawkapellas can not exceed thirteen people, unless special exception is voted upon.
- B. There are five different classes of membership: Soprano, Mezzo-Soprano, Contralto, Contralto II, and Vocal Percussionist. Any member can be in more than one class, and assignment of each class will vary depending upon the voice range of the individual, song being sung, and the needs of the group. All classes have equal rights.
- C. Selection of the members will be conducted by vocal auditions. The auditions will be reviewed by returning members (founding members) of the group. The official auditions will be held at the beginning of each school year; however, non-official auditions may be carried out in accordance with special situations.
- D. Members of the group can lose membership rights if they show a lack of commitment to the group. Revocation of membership will be decided by a $\frac{3}{4}$ vote of remaining members, In disciplinary circumstances, a returning member of the group may be required to re-audition. The decision to re-audition will be made by the Executive Committee.
- E. Concerns of Non-Executive Members should be brought to Executive Officers, who will then decide as a full committee on the actions to be taken.

Human Rights Clause:

In no aspect of its programs shall there be any difference in the treatment of persons on the basis of race, creed, color, religion, national origin, age, sex, pregnancy, disability, genetic information, status as a U.S. veteran, service in the U.S. military, sexual orientation, gender identity, associational preferences, or any other classification which would deprive the person of consideration as an individual. The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons. Eighty percent (80%) of this organization's membership must be composed of UI students.



App 2030

IVCF App 2341

Article III - Officers and Committees

Any member who has been in the group for more than one semester may be eligible for an officer position. Officers are appointed by a majority vote by the members of The Iowa Hawkapellas.

Every member must be allowed to vote in the event that they are not present at the meeting; email, SMS, or a phone call will suffice. An officer can be revoked of his title by a $\frac{3}{4}$ vote, save the president, who may be impeached only by a unanimous vote of non-president members.

Some officer positions belong to larger committees that help keep the group efficient and organized, These committees can meet at the discretion of committee members, and should send record of what was discussed and accomplished during the meeting to the President. Communication between committees is essential for the group as a whole, and should be done between committee leaders.

Members of the group can hold multiple officer positions; however, no member shall hold any officer position if they already hold Presidential office. The jobs of the officers are not limited to the member who holds the office, by requisition of jobs must be approved the officer and, depending on the situation, the president. Officer Positions G, H, and I can be distributed amongst any and all group members as they see fit.

The officer roles are as follows:

Members of the Executive Committee:

- A. President: Looks over all activities that involves the group. All final decisions must be approved by the president. Non-approval can be over-riden by a 100% concurrence of non-president members. The President may hold no other committee offices, regardless of convenience.
- B. Vice President: In charge of attendance, discipline, and maintaining focus during group rehearsals
- C. Music Director: In charge of handling music acquisition and running practices. The music director can appoint an accompanist in the event she cannot play piano, and can also appoint section leaders in the event that outside sectionals are necessary.

Members of the Business Committee:

- D. Treasurer: In charge of any accounts or monetary transactions dealing with The Iowa Hawkapellas, including merchandise sales and group reimbursement. Must have presidential approval to make withdrawals from group account.
- E. Marketing/PR Manager: In charge of finding potential events, advertising for events, and managing communication with the Executive Committee, customers, and the community at large
- F. Event Manager: In charge of scheduling and arranging events that involve The Iowa Hawkapellass interests. Event Manager should be aware of group funds in the event that booking requires payment.

Other Officer Positions:

- G. Webmaster: In charge of managing group website.
- H. Accompanist: An optional officer position. In charge of assisting Music Director.

- I. Secretary: An optional officer position that keeps records of all group meetings and rehearsals. Also would be in charge of organizing paperwork and storing extra music.
- J. Choreographer: An optional officer position in charge of organizing, teaching, and incorporating dance moves and choreography into songs. Also makes primary decisions for wardrobe for gigs in collaboration with President and normality of performance.

Other officer positions can be created that do not need to be reworked into said constitution. An “Assistant” Music Director would be a good example of this.

** Please Note: Because of the current small size of The Iowa Hawkapellas, most of the positions will be worked as more of a perfect democratic system.

Article IV - Advisor

No advisor has been selected to advise The Iowa Hawkapellas. Should one be appointed by a majority vote, notation of that should be made with an amendment to this constitution.

Article V - Meetings and Rehearsals

- A. Rehearsals will be held at least once per week during the academic term. Depending upon decisions made by the group, up to six group rehearsals may be held per week.
- B. Rehearsals and meetings will be advertised by means of e-mail or through verbal communication, whether it is by phone or during previous meeting/rehearsal.
- C. Should $\frac{3}{4}$ of the members be present at a meeting/rehearsal, a quorum is constituted. If $\frac{3}{4}$ are not present, voting cannot take place.
- D. Regular, weekly rehearsal times should be decided at the beginning of each semester by the Executive Committee with all other members' schedules in mind. Members with concerns about the schedule should approach the Executive Committee with their concerns, and can call a $\frac{3}{4}$ vote to amend the rehearsal schedule, Executive officers will pay special attention to Article II, Section A.
- E. All members should be on time to weekly rehearsals and should have all music that has been distributed to them by the Music Director or Secretary. Any member who repeatedly fails to be on time or bring their music to rehearsals is subject to disciplinary action, as seen fit by the Executive Committee. (See Article II, Sections E & F)
- F. Any member of the group has the authority to call a meeting as long as it is approved by a majority vote. Quorum is not necessary in these cases.
- G. A conclusionary meeting must be held once at the end of each academic semester to determine vacation-time activities and preparations for the next semester.
- H. Additional special meetings/rehearsals can be called by the president without a vote, but these are not mandatory in the event of prior conflict or less than two weeks notice being given.

Article VI - Monetary Issues

- A. Dues may be collected at any time in which there is a need for additional funding. These times will be determined by the Treasurer and President and must be approved by a majority vote in the group. It is understood that collection of dues should be immediate, in full, and on time in accordance with the Treasurer and President's decision. If a member fails to pay dues on time,

disciplinary action may be taken as the Executive Committee sees fit, depending on the circumstances. (See Article II, Sections E & F)

- B. Dues collected may not exceed \$50 per semester, unless an increase is decided upon by a $\frac{3}{4}$ vote.
- C. Upon disbandment of the group, monies and mandatory student fees revert back to the granting parties. Group funds are to be granted to the University of Iowa student government.
- D. If, after five years of account inactivity, the monies are not returned to the granting parties or the UISG from the 00 account, these funds will revert to an account specified by the UISG. These funds will then be available for distribution through SABAC guidelines in compliance with the University of Iowa policy.

Article VII - Said Constitution

The constitution is to be made known to each member of the group at the beginning of each scholastic year.

- A. The constitution must be read through at the first meeting of the group each year, or at the beginning of each semester with which new members have joined.
- B. The constitution will be available to view in the Office of Student Life office.
- C. $\frac{3}{4}$ vote is needed to amend the constitution.
- D. All amendments must be submitted to the Office of Student Life for approval.
- E. In signing this constitution, all members understand that they will follow all rules and guidelines stated within this Constitution, will maintain a positive attitude within the group, and will public reflect upon the group in a positive manner.

Signed: _____

Title: The Constitution of Love Works

Preamble: Love Works

Date: INSERT

Article I

Name: The name of our organization is "Love Works." It is an affiliated student group of Sanctuary Community Church, located at 2205 E Grantview Drive. Coralville, IA 52241

Purpose:

Love Works purpose is to foster a safe, inclusive environment for all that is conducive to people experiencing God in real ways. Love Works will be anchored in the Gospel, and will meet every other week on a regular basis for Bible studies, as well as twice a month to volunteer and serve our community. Using Jesus as our model, we seek to advocate for justice in all aspects of society, including but not limited to racial, LGBT, and socioeconomic issues.

Article II

Membership:

Section 1) In no aspect of its programs shall there be any difference in the treatment of persons on the basis of race, creed, color, religion, national origin, age, sex, pregnancy, disability, genetic information, status as a U.S. veteran, service in the U.S. military, sexual orientation, gender identity, associational preferences, or any other classification which would deprive the person of consideration as an individual. The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons. Eighty percent (80%) of this organization's membership must be composed of UI students.

Section 2) There will be no limitations as far as the minimum or maximum number of participants within the student organization.

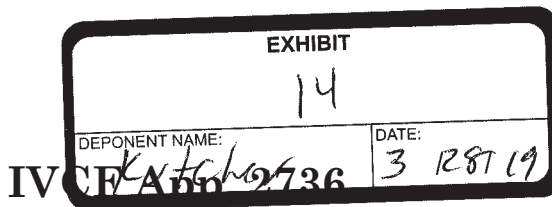
Section 3) Membership of Love Works is open to all students at the University of Iowa.

Article III

Officers and Duties:

There will be 4 executive officer positions within Love Works. In order to be an executive, they must sign and agree to the Mission and Statement of Core Beliefs of Love Works as outlined in article IV. The 4 executive officer positions are as follows:

1) President: The role of the President of Love Works will be to schedule, organize, and lead executive and large group meetings weekly. It is also their responsibility to manage all administrative issues, such as: amending the constitution, overseeing the work of the other executives, making any final decisions regarding the well-being of the student organization, and reaching out to form meaningful relationships with members of the organization. To fulfill their



App 2025

IVCF App 2345

responsibility, they must work closely with the College Pastor, emailing them updates on a weekly basis, as well as working closely with the other executives of the organization. It is the President's duty to work with the other officers to make sure all administrative work is successfully completed. In order to become President, a candidate should possess strong leadership skills (prior leadership experience is preferred), strong communication skills, and strong ethic to be able to complete all of the required duties as President.

2) Vice President: The primary role of the Vice President will be to organize, plan, and promote two volunteer/ service projects a month. The Vice President must work closely with the rest of the executive board to ensure consensus as to where Love Works is volunteering. The Vice President should be comfortable reaching out to leaders in the community to learn about the different opportunities Love Works has to serve.

3) Secretary: The primary role of the Secretary is to manage our 00 account, as well as work closely with the college Pastor to ensure all finances are going well. The treasurer is also responsible for applying for grants, or funding from the UISG whenever Love Works needs funding. The Secretary is also responsible for keeping track of attendance, and managing the excel spreadsheet of its members.

4) Public Relations Director: The main role of the secretary would be to market Love Works. They should send out emails to members reminding them of upcoming events, post on the Facebook page, and tweet about what is going on within Love Works. Also, during meetings, the public relations director should record minutes. Lastly, the public relations director is responsible for spearheading the student org fairs and promoting the group. Candidates considering the position of secretary should be organized and good communicators.

Article IV

Mission & Statement of Core Beliefs

Mission

To provide a space where people of all backgrounds can come to experience God in real ways and to share the good news of Jesus with not only everyone at the University of Iowa, but also those in our local communities.

Core Beliefs

1. **Jesus-Centered:** Jesus will be at the center of everything we do. His life and teachings provide a model worthy of imitation, and we believe through the life, death, and resurrection of Jesus, we can experience great joy and freedom.

2. Inclusion: We believe that Jesus was the ultimate example of someone who reaches out to the marginalized. We stand in full support of those who are victims of systemic oppression. We welcome full participation in our organization, regardless of race, gender, sexual orientation, gender identity, or ability, and affirm those in the LGBTQ+ community who have been pushed aside from many other faith communities.
3. Service: Jesus came to serve rather than be served. Thus, we place a high emphasis on volunteering. We will seek to share Christ's love with those in our community in tangible ways.
4. Life together: We believe God instilled in us the desire to be in community with others. We want to do life together, and foster an environment where sharing our fears, our successes and our struggles honestly is normalized and encouraged.

Article V

Meetings

Section 1) Meetings will be held every other week. Meetings will not be held during finals week or on University breaks and holidays.

Section 2) Volunteer opportunities will be throughout the semester, as outlined in the Vice President description under Article III.

Article VI

Elections

Section 1) Elections for the Executive Board will be held once a year during the Spring Semester to elect for the following school year.

Section 2) Eligible voters are those who have attended at least 50% of meetings. This will be documented and verified by Secretary.

Section 3) The winner of the elections shall be the candidate who receives a plurality of votes. Should there be a tie, there shall be a re-vote, considering only those who are tied. Should that not solve things, the executive board shall interview the candidates and come to a consensus of who shall be granted the position.

Section 4) Members will be notified in meeting and by email at least two weeks in advance of any upcoming election.

Article VII

Finances

8.1 General. Love Works may raise revenues through contributions, fundraising activities, or by applying for school funds available to student groups. At a minimum, Love Works shall: maintain its funds in an "00 account" set up and maintained for Love Works by obligations only when there is sufficient funding to honor the obligations; pay all debts in a prompt manner; and maintain accurate financial records showing all receipts and expenditures and all assets and liabilities of Love Works.

8.2 Distribution of Money Upon Love Works Dissolution. Upon Dissolution of Love Works, all state money and mandatory student fees revert back to the granting organization.

8.3 Distribution of All Funds Other Than State Money and Mandatory Student Fees Upon Love Works Dissolution. Upon dissolution of Love Works, all funds other than state money and mandatory student fees should be divided as stated in paragraph 8.4 and carried out by all Love Works' officers. If Love Works has dissolved and group fees have not been divided as stated in Paragraph 8.4 by 5 years from last account activity, monies in Love Works' 00 account will revert to an account specified for this purpose within UISG. These funds will then be available for distribution from SABAC guidelines in compliance with University of Iowa policy.

8.4 Methods for Distribution of All Funds Other Than State Money and Mandatory Student Fees Upon Love Works Dissolution. Upon dissolution of Love Works, all funds other than state money and mandatory student fees shall as far as practicable be returned to the granting organization, institution, or individual. Any funds that cannot be returned to their source shall be given to a charity selected by 75% of Love Works members. The University of Iowa or UISG is not responsible for the division of student fees outlined above. Love Works shall submit a copy of minutes which has record that Love Works agrees this is what is to be done with the money, along with filling out the appropriate approval forms, vouchers, and tax information in the Student Organization Business Office.

Article VIII

Amendments

Section 1) In order to amend this document, both a $\frac{3}{4}$ vote from officers and a $\frac{2}{3}$ vote by current members at the desired meeting is required to overturn or create changes to amendments.

Section 2) If an officer or a member wishes to amend this constitution, officers and members should be notified at least a week in advance by reading the proposed change(s) at one meeting to all members, as well as via email.

Article IX

Removal/ Appeals

Section 1) The removal of an executive board member will happen only if an egregious behavior transpires, as determined by the other executive board members. Should the executive board members be in disagreement, it shall be handled by the College Pastor.

Section 2) Should an executive board member feel wrongfully removed, he/she/they have the opportunity to appeal. That person must appeal within a week of being removed, and an appeal will occur at the next general meeting. Those who are eligible to vote (as outlined in Article VI, section 2) will vote to either confirm the executive board's decision, or reverse the decision. Should there be a tie, the College Pastor will make the final decision.

Article X

Section 1) This Constitution shall take immediate effect upon a majority vote of all officers of the organization. The organization shall have all authority necessary to implement this constitution.

From: Student Organization Help & Information

Sent: Tuesday, June 12, 2018 11:19 AM

To: Schrock, Katrina N [redacted]@uiowa.edu; Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>

Cc: [redacted]@uiowa.edu; [redacted]@uiowa.edu; [redacted]@uiowa.edu; kummer50@uiowa.edu

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Katrina,

I recognize the wish to have leadership requirements based on Christian beliefs, however Registered Student Organizations are considered University of Iowa programs and thus must follow the Human Rights Clause in its entirety. Having a restriction on leadership related to religious beliefs is contradictory to that clause.

I'm happy to chat further about this and provide any information I can.

Best,

Andy

Andy Kutcher, M.Ed.

he, him, his

Coordinator for Student Organization Development

Center for Student Involvement & Leadership

andrew-kutcher@uiowa.edu

<http://csil.uiowa.edu>

Adaptability | Harmony | Positivity | Consistency | Arranger

[Schedule an appointment with me](#)

IMU Center for Student Involvement & Leadership

145 Iowa Memorial Union

Iowa City, Iowa 52242-1317

319-335-3059 Fax 319-353-2245

getinvolved@uiowa.edu

From: Schrock, Katrina N

Sent: Tuesday, June 12, 2018 11:02 AM

To: Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>

Cc: [redacted]@uiowa.edu; [redacted]@uiowa.edu; [redacted]@uiowa.edu; kummer50@uiowa.edu

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Andy,

I would guess that the issues you see involve potential contradictions to the part of the Human Rights Clause that states: "In no aspect of its programs shall there be any difference in the treatment of persons...". From my reading, the language of the constitution does not contradict the later part of the Clause, which states: "...equal access to membership, programming, facilities, and benefits shall be open to all persons". Membership, events, and other facets of the group are not restricted – the only restriction is specifically for leadership positions.

While I understand that this leadership restriction can be construed as a difference in treatment, it is also important to have Christian leadership in a Christian organization. We do not in any way discourage those who may not subscribe to the basis of faith in Article II from participating in IVGCF as members, but we do recognize that having Christian leadership is important to the fulfillment of our purpose.

The above are my thoughts, but I am open to having further dialogue on the matter.

Katrina

From: Student Organization Help & Information

Sent: Tuesday, June 12, 2018 10:43 AM

To: Schrock, Katrina N [REDACTED]@uiowa.edu>; Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>

Cc: [REDACTED]@uiowa.edu>; [REDACTED]@uiowa.edu>; [REDACTED]@uiowa.edu>; kummer50 [REDACTED]

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Katrina,

On my initial review I see several issues. As part of compliance with the Human Rights Clause, organizations cannot have any language deemed contradictory to that Clause. I'm seeing potential contradictory language in Articles II, III, IV and VII. The language is directly related to the ability to become a member or to hold leadership positions.

Please let me know your thoughts, questions or concerns. I want to make sure this is clear.

Best,

Andy

From: Schrock, Katrina N

Sent: Tuesday, June 12, 2018 10:27 AM

To: Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>

Cc: [REDACTED]@uiowa.edu>; [REDACTED]@uiowa.edu>; [REDACTED]@uiowa.edu>; kummer50 [REDACTED]

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Andy,

I've now used the form you linked to submit the updated constitution. Please let me know if there is anything else you need from us, and thank you for your quick reply and for checking into the submission.

Katrina

From: Student Organization Help & Information

Sent: Tuesday, June 12, 2018 10:06 AM

To: Schrock, Katrina N [REDACTED]@uiowa.edu>; King, Laurynn L <laurynn-king@uiowa.edu>

Cc: [REDACTED]@uiowa.edu>; [REDACTED]@uiowa.edu>; [REDACTED]@uiowa.edu>; kummer50 [REDACTED]; Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Hi Katrina,

Did you use the OrgSync form (<https://orgsync.com/14241/forms/311661>) to submit? I'm not seeing your submission in the form or on the InterVarsity Graduate Christian Fellowship's OrgSync portal.

Best,

Andy

From: Schrock, Katrina N

Sent: Tuesday, June 12, 2018 9:25 AM

To: King, Lauryann L <lauryann-king@uiowa.edu>

Cc: [redacted]@uiowa.edu; [redacted]@uiowa.edu; [redacted]@uiowa.edu; [redacted]@uiowa.edu; kummer50 [redacted] Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Lauryann,

I was under the impression that the InterVarsity Graduate Christian Fellowship's constitution had been updated with the Human Rights clause, and submitted to OrgSync on either the 1st or 2nd of June. If this is not the case, I would appreciate if you would let me know as soon as possible, so that we can make the required changes.

Thank you,

Katrina

From: King, Lauryann L

Sent: Tuesday, June 12, 2018 9:15 AM

To: [redacted]@uiowa.edu; [redacted]@uiowa.edu

Cc: Schrock, Katrina N [redacted]@uiowa.edu; [redacted]@uiowa.edu; [redacted]@uiowa.edu; [redacted]@uiowa.edu; [redacted]@uiowa.edu; kummer50 [redacted]; Student Organization Help & Information <CSIL-Student-Org@uiowa.edu>

Subject: RE: InterVarsity Graduate Christian Fellowship Governing Documents

Thank you for your reply, Tiffany. It is important to keep your OrgSync profile updated with your new leadership team's contact information up-to-date, so we are able to reach out to the most current representatives.

Enjoy your day,

Lauryann

Lauryann King

she, her, hers

Administrative Services Coordinator

Center for Student Involvement & Leadership

lauryann-king@uiowa.edu



157 Iowa Memorial Union

Iowa City, Iowa 52242-1317

<http://csil.uiowa.edu>

319-335-3059 Fax 319-353-2245

Relator // Competition // Futuruistic // Woo // Belief

getinvolved@uiowa.edu

From: [REDACTED]
Sent: Tuesday, June 12, 2018 9:11 AM
To: King, Laurynn L <laurynn-king@uiowa.edu>; [REDACTED]@uiowa.edu
Cc: Schrock, Katrina N [REDACTED]@uiowa.edu; [REDACTED]@uiowa.edu; [REDACTED]@uiowa.edu; [REDACTED]@uiowa.edu; [REDACTED]@uiowa.edu; [REDACTED]@uiowa.edu; kkummer50 [REDACTED]
Subject: Re: InterVarsity Graduate Christian Fellowship Governing Documents

Hi Laurynn,

We forwarded the original email to the current leadership team. Both Lyubov and I are no longer serving on the team. I believe they were working on updating this information, but I have CC'd them on this email.

Thanks,

Tiffany

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "King, Laurynn L" <laurynn-king@uiowa.edu>
Date: 6/12/18 8:44 AM (GMT-06:00)
To: [REDACTED]@uiowa.edu, [REDACTED]@uiowa.edu
Subject: InterVarsity Graduate Christian Fellowship Governing Documents

I am following up to several communications our office has sent regarding InterVarsity Graduate Christian Fellowship Governing Documents on campus. Our office has you listed as contacts for this student organization.

We've sent a few e-mails, and also left voicemails, over the past few months regarding the need to update the organization's governing documents to include the University of Iowa's Human Rights clause. **The updated document(s) are due tomorrow, June 13th or your student organization will be placed on unregistered status.**

Please let me know a status update on these documents, or if you have any questions regarding the updates, and I can assist you.

Thank you in advance,

Laurynn

Laurynn King

she, her, hers

Administrative Services Coordinator

Center for Student Involvement & Leadership

laurynn-king@uiowa.edu

<http://csil.uiowa.edu>

Relator // Competition // Futuruistic // Woo // Belief

IMU Center for Student
Involvement
& Leadership

157 Iowa Memorial Union

Iowa City, Iowa 52242-1317

319-335-3059 Fax 319-353-2245

getinvolved@uiowa.edu

Notice: This UI Health Care e-mail (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521 and is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you are not the intended recipient, any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy all copies of the original message and attachments thereto. Email sent to or from UI Health Care may be retained as required by law or regulation. Thank you.

FAQs Regarding Registered Student Organizations (RSO) governing documents.

What is being asked of Registered Student Organizations?

What statements are required and why?

When do changes need to be made?

How do I submit my governing documents for review?

Will I get feedback on my constitution?

When are final submissions due?

What happens if my RSO doesn't get their governing documents approved in time?

I noticed I can't upload my governing documents into my OrgSync portal, will CSIL upload them into my portal for me?

When will we have to update our governing documents again?

What if my governing documents are from of a national organization?

What is being asked of Registered Student Organizations?

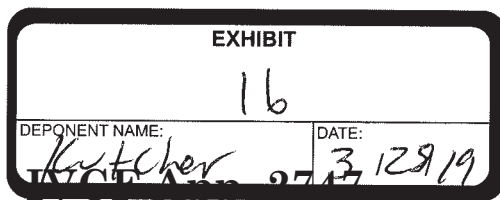
RSOs are being asked to ensure their governing documents meet the standards set forth by the University of Iowa, including having all required statements/clauses.

What statements are required and why?

It's important that all RSOs have up to date governing documents that reflect the values and practices of the University of Iowa. The University of Iowa and its affiliated entities must comply with the State of Iowa Human Rights Clause. RSO's governing documents are required to have the following Human Rights Clause listed in their constitution verbatim:

Human Rights Clause:

In no aspect of its programs shall there be any difference in the treatment of persons on the basis of race, creed, color, religion, national origin, age, sex, pregnancy, disability, genetic information, status as a U.S. veteran, service in the U.S. military, sexual orientation, gender identity, associational preferences, or any other classification which would deprive the person of consideration as an individual. The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons. Eighty percent (80%) of this organization's membership must be composed of UI students.



When do changes need to be made?

All changes are required to be submitted to the Center for Student Involvement and Leadership for approval no later than June 15, 2018. However we recommend making these changes as soon as possible to allow time for CSIL staff to review and provide feedback if needed.

How do I submit my governing documents for review?

RSOs can submit their governing documents for review using the OrgSync form linked below:

<https://orgsync.com/14241/forms/311661>

Will I get feedback on my constitution?

Yes. The Center for Student Involvement and Leadership will be reviewing RSO governing documents and provide feedback if your constitution is not correct.

When are final submissions due?

If given feedback from CSIL that changes need to be made, final submissions will be due by June 15, 2018.

Is there anything required if my first submission is approved?

No. If your first submission of governing documents is approved, you will receive an email stating that you will not need to make further changes.

What happens if my RSO doesn't get their governing documents approved in time?

Any RSO who does not have a governing document approved by June 15, 2018 will be deactivated until the governing documents are approved.

I noticed I can't upload my governing documents into my OrgSync portal, will CSIL upload them into my portal for me?

Yes. CSIL will upload all approved governing documents into the RSO's OrgSync portal.

When will we have to update our governing documents again?

Unless there is a change to what is required in governing documents, RSOs need to review their governing documents regularly. In the future, RSOs can use the same form, linked below to submit their governing documents to CSIL for approval.

What if my governing documents are from of a national organization?

You can still submit national constitutions, but we will require bylaws for your local chapter at the University of Iowa. Those bylaws will need to include all required statements.

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

<p>BUSINESS LEADERS IN CHRIST, <i>Plaintiff,</i></p> <p>v.</p> <p>THE UNIVERSITY OF IOWA, <i>et al.,</i> <i>Defendants.</i></p>	<p>Case No.: 3:17-cv-00080-SMR-SBJ</p> <p>DEFENDANTS' REPLY TO PLAINTIFF'S RESISTANCE TO THEIR PARTIAL MOTION FOR SUMMARY JUDGMENT</p>
---	---

INTRODUCTION

Plaintiff does not raise any new or unanticipated arguments in its Resistance to Defendants' Motion for Summary Judgment. However, Defendants believe that a very brief Reply is warranted, given Plaintiff's record in this case.

ARGUMENT

THE INDIVIDUAL DEFENDANTS ARE ENTITLED TO QUALIFIED IMMUNITY

In its Resistance, Plaintiff accuses Defendants of bigotry and of presenting "make-believe defamatory accusations," while repeatedly claiming that various pieces of evidence are "undisputed" despite Defendants' detailed denials of BLinC's claims in its Response to Plaintiff's Statement of Material Facts. *See* Plaintiff's Reply, p. 2, 6–8, 13 (Plaintiff claiming that BLinC was targeted "specifically for its beliefs" with no citation to the record), 15; *see also* Defendants' Response to Plaintiff's Statement of Undisputed Material Fact ¶¶ 154 (Defendants denying that "BLinC has always sought to create a welcoming environment; thus, anyone is welcome to join as a member"), 241–50 (Defendants denying that Plaintiff properly

EXHIBIT	
17	
DEPONENT NAME: <i>Kutcher</i>	DATE: 3/28/19

characterized the manner in which the University conducted its investigation into student group 24-7); 127–135 (Defendants denying Plaintiff’s assertion that BLinC “welcomes anyone as a leader”—particularly in regard to the reason why Marcus Miller was not permitted to serve on BLinC’s leadership team); ¶¶ 208–19 (Defendants denying Plaintiff’s contention that Dr. Nelson and Dean Baker told BLinC members that their actions had not violated the University’s Policy). Further, Plaintiff’s contention that “it is undisputed that BLinC does not violate the Policy” is at the very heart of this case and Defendants position is in direct opposition to this statement. *See* DOSUMF ¶ 182, 197–198, 212, 220–221, 226–29, 232–33. This is obviously a disputed issue.

In an attempt to demonstrate the alleged viewpoint discrimination at issue in this case, BLinC compares itself with Love Works, an “LGBTQ+ affirming” Christian group which maintains registered status on campus. Plaintiff’s Resistance, p. 15–16. Plaintiff states that other groups, including Love Works, are being “lauded” by Defendants for providing “safe spaces for minorities which have historically been the victims of discrimination.” Plaintiff’s Resistance p. 1. The obvious difference between BLinC and Love Works is that BLinC’s Statement of Faith *excludes* people who are members of a protected class, while Love Works’ Constitution does not exclude any member of a protected class, and is generally inclusive of all categories of people. P. App. 239–43. People who disapprove of homosexual behavior are not a protected class, and Love Works, as a Christian group, does not exclude Christians. *See id.*¹

¹ Under “Core Beliefs” the Love Works Constitution states:

1. Jesus-Centered: Jesus will be at the center of everything we do. His life and teachings provide a model worthy of limitation, and we believe through the life, death, and resurrection of Jesus, we can experience great joy and freedom.
2. Inclusivity: We believe that Jesus was the ultimate example of someone who reaches out to the marginalized. We stand in full support of those who are victims of systematic oppression. We welcome full participation in our organization, regardless of race, gender, sexual orientation, gender identity, or

Similarly, BLinC compares itself to the House of Lorde, a student group which restricts membership and leadership pending an interview by the Membership Recruitment Chair, and seeks to maintain a “space on campus . . . where intersectional feminism/womanism specifically includes the support of Black Queer individuals who’ve experienced trauma in the arena of domestic violence, HIV/AIDs/STD awareness, legal support, and Housing.” P. App. 1143. Again, the language included in House of Lorde’s constitution does not exclude any student on the basis of a protected characteristic. *See id.* People who dislike black students, queer students, or feminist students, or want to disrupt a group meant to support black, queer, and feminist students, are not members of a protected class on that basis. *See Iowa Code Chapter 216.* And unlike Marcus Miller, who actually held conservative Christian beliefs which were mostly in-line with BLinC’s and earnestly sought to be a leader in the group, someone who dislikes minorities, feminists, or LGBTQ+ individuals would have no pure motives for joining the House of Lorde. *See D. Supp. App. 168–76* (Miller outlining some of his Christian beliefs in his 24:7 leadership application); P. App. 590–91 (Miller expressing his pain at having been rejected by BLinC despite his desire to “follow Jesus with all of [his] heart.”).

Plaintiff points to *Obergefell and Masterpiece Cakeshop* to illustrate its point that government officials must “proceed in a manner neutral toward and tolerant of . . . religious beliefs’ they may personally find abhorrent.” Plaintiff’s Resistance, p. 3, citing 138 S. Ct. 1719, 1729 (2018). Defendants generally agree with the above premise, however, must point out that the baker in *Masterpiece Cakeshop* was an employee in a private business—not a student group

ability, and affirm those in the LGBTQ+ community who have been pushed aside from many other faith communities.

...

P. App. 240–41.

in a limited public forum receiving state benefits. *Id.* at 1724. While Defendants must apply their Policy in a viewpoint neutral way, they are not required to look the other way when a group openly contravenes civil rights laws which have been adopted at both the state and federal level. *See* Iowa Code Ch. 216; 42 U.S.C. 2000e–2000e-17.

CONCLUSION

The individual Defendants are entitled to qualified immunity as a matter of law.

THOMAS J. MILLER
Attorney General of Iowa

/s/GEORGE A. CARROLL
George A. Carroll
Assistant Attorney General
Hoover Building, Second Floor
1305 East Walnut Street
Des Moines, Iowa 50319
PHONE: (515) 281-8583
FAX: (515) 281-7219
E-MAIL: George.carroll@ag.iowa.gov
ATTORNEYS FOR DEFENDANTS

Original filed electronically.

Copy electronically served on all parties of record.

PROOF OF SERVICE	
The undersigned certifies that the foregoing instrument was served upon each of the persons identified as receiving a copy by delivery in the following manner on November 9, 2018:	
<input type="checkbox"/> U.S. Mail	<input type="checkbox"/> FAX
<input type="checkbox"/> Hand Delivery	<input type="checkbox"/> Overnight Courier
<input type="checkbox"/> Federal Express	<input type="checkbox"/> Other
<input checked="" type="checkbox"/> ECF System Participant (Electronic Service)	
Signature: <u>/s/Betty Christensen</u>	

Organization Name	Compliant (YES, NO, REVIEW STOPPED, PENDING LITIGATION)
5050 in 2020 @ Iowa	YES
AAUW at Iowa	YES
Acacia Fraternity	YES
Academy of Managed Care Pharmacy (AMCP) Student Chapter at the University of Iowa (UI)	YES
Active Minds at The University of Iowa	YES
Actuarial Science Club	YES
Advocates for Cross Cultural Experiences (ACCE)	YES
African Student Association	YES
Agape Chinese Student Fellowship	STOPPED, PENDING LITIGATION
ALMA (Association of Latinos Moving Ahead)	YES
Alpha Chi Omega	YES
Alpha Delta Pi	YES
Alpha Epsilon Phi	YES
Alpha Epsilon Pi	YES
Alpha Kappa Alpha Sorority, Inc.	YES
alpha Kappa Delta Phi	YES
Alpha Kappa Psi Professional Business Fraternity	YES
Alpha Phi	YES
Alpha Phi Alpha	YES
Alpha Phi Omega-Omicron (APO)	YES
Alpha Sigma Phi	YES
Alpha Tau Omega	YES
Alpha Xi Delta	YES
Amateur Radio Club (University of Iowa)	YES
American Academy of Pediatric Dentistry	YES
American Advertising Federation (formerly known as Students in Advertising)	YES
American Association of Petroleum Geologists	YES
American Association of Public Health Dentistry University of Iowa Student Chapter	YES
American Association of Women Dentists	YES
American Chemical Society Student Chapter (U of I)	YES
American College of Clinical Pharmacy Student Chapter (University of Iowa)	YES
American College of Veterinary Pharmacists	YES
American Constitutional Society for Law and Policy, University of Iowa College of Law Chapter	YES
American Institute of Aeronautics and Astronautics	YES
American Institute of Chemical Engineers - University of Iowa Student Chapter	YES
American Marketing Association (U of I chapter)	YES
American Medical Women's Assoc - UI Stdt Branch (AMWA)	YES
American Pharmacists Association - Academy of Student Pharmacists	YES
American Rehabilitation Counseling Association (UI)	YES
American Sign Language Club (ASL Club)	YES
American Society of Civil Engineers (ASCE)	YES

EXHIBIT	
18	DATE: 3/28/19
DEPONENT NAME: <i>Kutcher</i>	

American Society of Mechanical Engineers	YES
American Wind Energy Association (Student Chapter)	YES
Amnesty International (U of I)	YES
Anime and Manga Club	YES
Anime, Comics & Games Association	YES
Anthropology Club (University of Iowa)	YES
Anthropomorphic Furry Friends	YES
Arab Students Association	YES
Art Hawks	YES
Artineers	YES
Asian Pacific American Medical Student Association	YES
Asian Pacific American Student Association (U of I)	YES
Associated Residence Halls (ARH)	YES
Association for Computing Machinery Student Chapter	YES
Association for India's Development-IOWA	YES
Association for Multicultural Scientists	YES
Association of Graduate Nursing Students	YES
Association of Graduate Students in English (AGSE)	YES
Association of Nursing Students (UIANS)	YES
Association of Pre-Physician Assistant Students	YES
Astronomy Club	YES
Athletes in Action	STOPPED, PENDING LITIGATION
Auto Club	YES
B Sides	YES
Backpack Project	YES
Badminton Club (U of I)	YES
Ballet Club at Iowa	YES
Baseball Club (Iowa Hawkeye)	YES
Bass Fishing Team (Iowa)	YES
Be The Match on Campus-UI	YES
Bertrand Russell Society - Iowa Chapter	YES
Best Buddies	YES
Beta Theta Pi	YES
Big Brothers Big Sisters at Iowa	YES
Bijou Theater	YES
Bike Friends (University of Iowa) (Formerly Recreational Bicycling Club - UI)	YES
Biochemistry Majors Club (University of Iowa)	YES
Biological Interests Organization (University of Iowa)	YES
Biomedical Engineering Student Society	YES
Biostatistics Student Organization	YES
Black Law Student Association, Alexander G. Clark Sr. & Jr. Chapter (University of Iowa College of Law)	YES
Black Student Union	YES
Board Game Club	YES

Body Image and Eating Disorder Awareness	YES
Book of the Month Club	YES
Bowling Club (U of I)	YES
Brandyou Fashion Channel	YES
Brazilian Jiu-Jitsu Club (Hawkeye)	YES
Breakers (U of I)	YES
Bridges International (UI Chapter)	STOPPED, PENDING LITIGATION
Bruce Gronbeck Rhetoric Society	YES
Business Leaders in Christ	STOPPED, PENDING LITIGATION
Camp Adventure Youth Services	YES
Camp Kesem	YES
Campus Activities Board (CAB)	YES
Campus Bible Fellowship	STOPPED, PENDING LITIGATION
Campus Christian Fellowship	STOPPED, PENDING LITIGATION
Caribbean Student Association	YES
Carver College of Medicine Student Government	YES
Carver College of Medicine-Medicus Mentorship Program	YES
CHAARG at Iowa	YES
Chabad Jewish Student Association	STOPPED, PENDING LITIGATION
Chess Club	YES
Chi Alpha Christian Fellowship	STOPPED, PENDING LITIGATION
Chi Epsilon	YES
Chi Omega	YES
Chi Sigma Iota Counseling Academic & Prof. Honor Society Int'l; Rho Upsilon Chapter	YES
Child Life Student Association (UI)	YES
Children of the Clay - The (formerly Ceramics Society)	YES
Chinese Dance Club	YES
Chinese in Iowa City	YES
Chinese Music Club	YES
Chinese Student Christian Fellowship	STOPPED, PENDING LITIGATION
Chinese Students and Scholars Association (CSSA)	YES
Christian Legal Society	STOPPED, PENDING LITIGATION
Christian Medical Association	STOPPED, PENDING LITIGATION
Christian Pharmacy Fellowship	STOPPED, PENDING LITIGATION
Chronic Illness Alliance	YES
Circle K International	YES
Clothing Closet at Iowa	YES
Club Cheerleading	YES
College Diabetes Network at Iowa	YES
College of Education Graduate Student Executive Committee	YES
College of Law Federalist Society	YES
College of Medicine Emergency Medicine Interest Group (University of Iowa)	YES
College of Pharmacy Student Leadership Council	YES

College Republicans	YES
Colleges Against Cancer (U of I)	YES
Collegiate 4-H (The University of Iowa)	YES
Communication Studies Graduate Student Association	YES
Communication Studies Student Association	YES
Competitive Club Golf Team (Iowa)	YES
Computer Comfort	YES
Continental Crossings	YES
Cosplay Club at Iowa	YES
Craft, Critique, Culture Conference Planning Committee	YES
Cricket Club	YES
Crisis Center	YES
Cru	STOPPED, PENDING LITIGATION
Dance Club (University of Iowa)	YES
Dance Marathon	YES
Dean's Student Advisory Committee	YES
Debate Club (U of I)	YES
DeGowin Blood Center Student Organization (University of Iowa)	YES
Delta Chi	NO LONGER REGISTERED AT UI
Delta Delta Delta	YES
Delta Gamma	YES
Delta Lambda Phi	YES
Delta Phi Lambda	YES
Delta Sigma Phi	YES
Delta Sigma Pi (Professional Business Fraternity)	YES
Delta Sigma Theta	YES
Delta Tau Delta	YES
Delta Upsilon	YES
Delta Zeta	YES
Disc Golf Club	YES
Earthwords	YES
Eats And Treats	YES
Ed on Campus	YES
Electrochemical Society Student Chapter at Iowa	YES
Emergency Medical Services Student Interest Organization (University of Iowa)	YES
Enactus at Iowa	YES
Engineering Student Council	YES
English Society (University of Iowa)	YES
Environmental Coalition (U of I)	YES
Environmental Law Society	YES
Epidemiology Student Association	YES
EPX Studio	YES
EQUAL Meds (formerly Med Iowa's Queer Students (MEDIQS))	YES

eSports Club at Iowa	YES
Eta Sigma Phi National Classics Honor Society	YES
Euchre Club at Iowa	YES
Exchanges	YES
Fair Trade at Iowa	YES
Family Medicine Interest Group	YES
Federal Reserve Challenge at Iowa	YES
Female Alliance of Civil Engineers	YES
Fencing Club (U of I)	YES
Fight Inclined Student Thespians	YES
Figure Skating Club (Black and Gold)	YES
Financial Management Association	YES
Fine Arts Council	YES
FIRST Alumni Club	YES
First Generation Iowa	YES
FLARES (Foreign Language Acquisition Research and Education Students)	YES
Food Pantry at Iowa	YES
Fools Magazine	YES
Fraternal Values Society	NO LONGER REGISTERED AT UI
From Cover To Cover	YES
Futures Trading Challenge	YES
Gamma Iota Sigma	YES
Gamma Phi Beta	YES
Gamma Rho Lambda	YES
Gardeners (University of Iowa)	YES
Geneva Campus Ministry	STOPPED, PENDING LITIGATION
Global Health Club	YES
Golden Key International Honour Society	YES
Graduate & Professional Student Government	YES
Graduate Association of Political Science	YES
Graduate History Society (GHS)	YES
Graduate Organization of Higher Education and Student Affairs (GOHESA)	YES
Graduate Philosophical Society (U of I)	YES
Graduate Social Work Student Association	YES
Graduate Student Anthropology Association (U of I)	YES
Graduate Student Senate	YES
Graduate Women in Science - Iowa City Chapter (previously GWIS - Iota Chi)"	YES
Greater China Business Association	YES
Guitar Club at Iowa	YES
Habitat for Humanity Campus Chapter (U of I)	YES
HackIowa	YES
Hallyu@Iowa	YES
Hawkapellas - Iowa	YES

Hawkeye Athletic Training Association (HATA)	YES
Hawkeye Ballroom Dance Company	YES
Hawkeye Caucus	YES
Hawkeye Flying Club	YES
Hawkeye History Corps	YES
Hawkeye Model UN delegation	YES
Hawkeye Optimist Chapter	YES
Hawkeye Sparkles (University of Iowa)	YES
Hawkeye Water for Change! (Formerly: Hawkeye Water to Thrive)	YES
Hawkeyes Fighting Alzheimer's	YES
Hawkeyes for Humanity	YES
Hawkeyes for Israel	YES
Hawkeyes Plan Events - HYPE (formerly Student Event Planners Association - UI)	YES
Hawks for Choice	YES
Hawks for McGuire	YES
Hawks Nest	YES
HawkTrade	YES
Heart Workshop	YES
HFES Student Chapter at Iowa	YES
Hillel (University of Iowa)	STOPPED, PENDING LITIGATION
Hispanic Dental Association (Iowa Chapter)	YES
Hispanic/Latino Law Student Association	YES
Homecoming Council	YES
Hong Kong Student Association	YES
House of Lorde: a space for Black Queer Individuals	YES
Human Rights Student Collective	YES
Human Trafficking Initiative	YES
IC RED	YES
I-Envision Entrepreneurship	YES
Imam Mahdi Organization	STOPPED, PENDING LITIGATION
Immunity Campaign	YES
Indian Student Alliance (ISA)	YES
INFORMS Iowa Student Chapter	YES
Institute of Industrial and Systems Engineers (IISE)	YES
Integrative Medicine Interest Group	YES
Intellectual Property Law Society	YES
Interfraternity Council (IFC)	YES
International Genetically Engineered Machine	YES
International Law Society	YES
International Law Student Association (formerly International Law-school Student Association)	YES
International Neighbors at Iowa	STOPPED, PENDING LITIGATION
International Student Outdoor Recreation Association	YES
Intersection	YES

	STOPPED, PENDING LITIGATION
InterVarsity Graduate Christian Fellowship	YES
InvestHer	YES
Iowa Agni	YES
Iowa American Student Dental Association (IASDA)	YES
Iowa Andhi	YES
Iowa Comic Book Club	YES
Iowa Edge Student Organization - The	YES
Iowa Formula	YES
Iowa Forum for Graduate Medievalists	YES
Iowa Health Administration Club	YES
Iowa Improv Club	YES
Iowa Journal of Cultural Studies	YES
Iowa Kendo Kumdo Club	YES
Iowa Marine Autonomous Racing Club	YES
Iowa Men's Hockey	YES
Iowa National Lawyers Guild	YES
Iowa Neuroscience Club	YES
Iowa Print Group	YES
Iowa Quiz Bowl	YES
Iowa Student Association of Healthcare Leaders	YES
Iowa Student Athlete Advisory Committee	YES
Iowa Student Bar Association	YES
Iowa Student Chapter of the American String Teachers Association	YES
Iowa Student Medical Research Club	YES
Iowa Student Psychology Association (ISPA)	YES
Iowa Students for Refugees	YES
Iowa Surgical Interest Group	YES
Iowa Young Americans for Freedom Chapter	YES
Iowa-Illinois Industrial Hygiene Student Association (I3HSA)	YES
J. Reuben Clark Law Society	STOPPED, PENDING LITIGATION
Japan Karate-Do Organization of University of Iowa	YES
Jazz Club	YES
Journal of Corporation Law	YES
Journal of Gender, Race & Justice	YES
Journalism and Mass Communication Graduate Student Association	YES
Judo Club (University of Iowa)	YES
Juggalos (U of I)	YES
Kappa Alpha Psi	no (has been unregistered)
Kappa Alpha Theta	YES
Kappa Kappa Gamma	YES
Kappa Psi Pharmaceutical Fraternity	YES
Kappa Sigma	NO LONGER REGISTERED AT UI
Knitting Club (UI)	YES

Korean Conversation Group	YES
Korean U Iowa Students Association	YES
KRUI-FM	YES
Lacrosse (U of I - Men's)	YES
Lacrosse (U of I - Women's)	YES
Lambda Chi Alpha	YES
Lambda Theta Nu Sorority, Inc.	YES
Lambda Theta Phi Latin Fraternity, Inc.	YES
Latina/o Graduate Student Association	YES
Latino Medical Student Association - University of Iowa Roy J. & Lucille A. Carver College of Medicine	YES
Letter-day Saint Student Association	STOPPED, PENDING LITIGATION
League of Legends Club (UI)	YES
League of United Latin American Citizens Collegiate Council #373	YES
Leopold Society	YES
LGBT Advocates for Public Health Equity	YES
Library & Info Science Std Chapter of American Lib Assoc. (LISSO)	YES
Love Works	YES
Lutheran Campus Ministry	STOPPED, PENDING LITIGATION
Malaysian Student Society	NO
Master of Business Administration Association (MBAA)	YES
Math Graduate Board (MGB)	YES
Media Entertainment & Lifestyle	YES
Medicus Pre-Medical Society	YES
Microbiology Undergraduate Student Association	YES
Middle East Law Students Association	YES
Mindful@Iowa	YES
Minority Association of Pre-medical Students	YES
Mock Trial Club (U of I)	YES
Moneythink	YES
MPR Dance Crew	YES
Multicultural Business Student Association	YES
Multicultural Greek Council	YES
Multicultural Nursing Association	YES
Multi-Ethnic Engineering And Science Association	YES
Multieethnic Undergrad Hawkeye InterVarsity	STOPPED, PENDING LITIGATION
Multiracial Student Association	YES
Musicology Society (University of Iowa)	YES
Muslim Students Association	STOPPED, PENDING LITIGATION
Narwhal Finance Group	YES
National Alliance on Mental Illness on Campus at Carver College of Medicine	YES
National Association for Music Education	YES
National Association for the Advancement of Colored People (UI Chapter of NAACP)	YES
National Association of Black Journalists - Unity (UI)	YES

National Community Pharmacists Association	YES
National Pan-Hellenic Council (NPHC)	YES
National Residence Hall Honorary	YES
National Retail Federation Student Association	YES
National Science Teachers Association Chapter at Iowa	YES
National Society of Black Engineers (NSBE)	YES
National Society of Collegiate Scholars	YES
National Student Speech Language Hearing Association (NSSLHA)	YES
Native American Student Association	YES
Nepalese Student Association	YES
Net Impact	YES
Net Impact Ujowa	YES
Neuroscience Journal Club	YES
Newman Catholic Student Center	STOPPED, PENDING LITIGATION
Nightingale Writers' Group	YES
NOBCCHE (National Organization for the Professional Advancement/Black Chemists & Chemical Engineers)	YES
Old Gold A Cappella	YES
Olympic Weightlifting Club (University of Iowa)	YES
Omega Chi Epsilon	YES
Omicron Delta Kappa	YES
ONE at University of Iowa	YES
Operation Smile at Iowa	YES
Order of Omega	YES
Organization for the Active Support of International Students (OASIS)	YES
Organization for Women Law Students & Staff (OWLSS)	YES
Orthodox Christian Fellowship	STOPPED, PENDING LITIGATION
Orthopedic Surgery Interest Group	YES
oSTEM@Iowa	YES
Outlaws	YES
Pain Management, Substance Use Disorders, Palliative Care (U of I)	YES
Pakistani Student Association	YES
Panhellenic Council (PHC)	YES
PAWS - UI (Promoting Animal Welfare in Society)	YES
Pediatric Pharmacy Advocacy Group at the University of Iowa	YES
Percussion Society (U of I)	YES
Persian Student Organization	YES
Pharmacy Ambassadors	YES
Pharmacy Communicators Association	YES
Phi Alpha Delta Law Fraternity, International Hammond Chapter	YES
Phi Alpha Delta Pre-Law Fraternity	YES
Phi Beta Chi	YES
Phi Beta Sigma	YES
Phi Delta Chi Pharmacy Fraternity	YES

Phi Delta Theta	YES
Phi Eta Sigma (Freshman Honor Society)	YES
Phi Gamma Delta (FIU)	YES
Phi Gamma Nu Professional Business Fraternity	YES
Phi Kappa Psi	YES
Phi Kappa Theta	YES
Phi Lambda Sigma	YES
Phi Mu Alpha Sinfonia Men's Music Fraternity, Iota Gama Chapter	YES
Phi Sigma Pi National Honor Fraternity	YES
Physical Therapy Student Organization	YES
Pi Alpha Phi	YES
Pi Beta Phi	YES
Pi Kappa Alpha (PIKE)	YES
Pi Kappa Phi	YES
Pi Sigma Alpha - Political Honors Society at Iowa	YES
PMBA Student Association, Des Moines (University of Iowa)	YES
Powerlifting (University of Iowa)	YES
Pre-Dental Club (U of I)	YES
Pre-Health International Association	YES
Pre-Occupational Therapy Club	YES
Pre-Optometry Club (U of I)	YES
Pre-Physical Therapy Organization	YES
Pre-Veterinary Club	YES
Product Design Studio	YES
Psi Chi International Honor Society in Psychology	YES
Public Relations Student Society of America (PRSSA)	YES
Quidditch Club	YES
Radiation Sciences Student Organization	YES
Ratio Christi	STOPPED, PENDING LITIGATION
RAYS of REACH	YES
Reaching OUT in Business	YES
Real Estate Club (The)	YES
Red Shamrock Student Organization	YES
Religion Graduate Students Organization	YES
Rex Montgomery Physician Assistant Student Society	YES
Rho Chi Society: Delta Chapter	YES
Rho Lambda	YES
RiverRun	YES
Robotics Club (University of Iowa)	YES
Rock Climbing Club	YES
Roosevelt Network	YES
Rowing Club (Men's)	YES
Rugby Club (Men's)	YES

Rugby Club at Iowa (Women's)	YES
Running Club (University of Iowa)	YES
Russian-Speaking Students and Scholars Association	YES
Sailing Club (Iowa)	YES
Sales Engineering Club	YES
Salsa Dance Club	YES
Salt Company - The	STOPPED, PENDING LITIGATION
SCOPE Productions (Student Commission on Programming Entertainment)	YES
Secular Students at Iowa	YES
Semper Fidelis Society	YES
Shooting Sports Club	YES
Sigma Alpha Epsilon	NO LONGER REGISTERED AT UI
Sigma Alpha Iota - Zeta Epsilon	YES
Sigma Alpha Lambda	YES
Sigma Chi	YES
Sigma Lambda Beta	YES
Sigma Lambda Gamma	YES
Sigma Nu	NO LONGER REGISTERED AT UI
Sigma Nu Tau Entrepreneurship Honors Society	YES
Sigma Phi Epsilon	YES
Sigma Pi	YES
Sigma Tau Delta International English Honors Society, Alpha Tau Iota Chapter of Iowa	YES
Sikh Awareness Club	STOPPED, PENDING LITIGATION
SistaSpeak	YES
Ski & Snowboard Club (U of I)	YES
Slavic Student Alliance	YES
Soccer (Iowa Women's)	YES
Social Work Student Association	YES
Society for Human Resource Management	YES
Society of Automotive Engineers	YES
Society of Black Graduate & Professional Students (BGAPS)	YES
Society of Composers, Inc. Student Chapter	YES
Society of Hispanic Professional Engineers	YES
Society of Physics Students	YES
Society of Women Engineers	YES
Softball Club (University of Iowa)	YES
Sound Awareness for Everyone (University of Iowa - student affiliate group)	YES
South Asian Student Alliance	YES
Special Olympics (University of Iowa Chapter)	YES
Spectrum UI	YES
Sport and Recreation Management Club	YES
Sports Law Society of the University of Iowa	YES
Sports Stocks	YES

Sri Lankan Students' Association (SLSA)	YES
St. Paul's University Center	STOPPED, PENDING LITIGATION
STAR (Students To Assist Recruitment)	YES
Stars and Stripes Club	YES
Starts With Soap	YES
Strength in Numbers	YES
Student Academy of Audiology	YES
Student Advancement Network	YES
Student Advocates for Planned Parenthood	YES
Student Iowa School Counseling Association	YES
Student National Medical Association	YES
Student National Pharmaceutical Association	YES
Student Photography Organization	YES
Student Society of Health-System Pharmacists (University of Iowa)	YES
Student United Way	YES
Student Video Productions (SVP)	YES
Students Against Casteism	YES
Students Care	YES
Students for Boys and Girls Club of Iowa City	YES
Students for Human Rights	YES
Students for Interprofessional Practice and Education (formerly Students for Interprofessional Education)	YES
Students for Life	YES
Students for Pat Wronkiewicz	YES
Students for Reynolds	YES
Students in Design (UI)	YES
Students in Technology and Sciences	YES
Students International Meditation Society	YES
Students Supporting Israel	YES
Swing Dance Club	YES
Tabletop RPG Organization (The U of I)	YES
Taiwanese Student Association	YES
Tau Beta Pi	YES
Tau Kappa Epsilon (TKE)	YES
Tau Omega Catholic Service Fraternity	STOPPED, PENDING LITIGATION
Tau Sigma Military Dental Club	YES
Teddy Bear Clinic	YES
Tennis Club (Hawkeye)	YES
Tennis Club (International)	YES
Thai Student Association	YES
The Cell-Yaks Club	YES
The Gymnastics Club at Iowa	YES
Therapeutic Recreation Student Association	YES
Theta Tau-Professional Engineering Fraternity	YES

Tippie Senate	YES
Tippie Students for Service (formerly Tippie Community Collective)	YES
Tippie Technology and Innovation Assoc.	YES
To Write Love on Her Arms at The University of Iowa	NO
Track and Field Club (Iowa)	YES
Traditional Jujutsu Club (Iowa)	YES
Trans Alliance - UI	YES
Transfers Leading Change	YES
Translate Iowa Project - The	YES
Transnational Law & Contemporary Problems	YES
Triathlon Club (U of I)	YES
Turkish Student Association	YES
Turning Point USA	YES
Twenty Four Seven	STOPPED, PENDING LITIGATION
Tzu Chi Collegiate Association	YES
UI Students for Disability Advocacy & Awareness (Formerly: Hawkeye Accessibility Ambassador Org)	YES
UISG (University of Iowa Student Government)	YES
UISight	YES
Ultimate Frisbee (Women's)	YES
Ultimate Frisbee Club (Iowa Hawkeye Men's)	YES
Under Your Wing	YES
Undergraduate Art History Society	YES
Undergraduate Dance Organization	YES
Undergraduate Political Science Association	YES
Undergraduate Public Health Organization	YES
Unified for Uganda	YES
United Nations Association (University of Iowa)	YES
University Democrats	YES
University of Iowa Men's Club Volleyball	YES
University of Iowa Men's Soccer Club	YES
University of Iowa Men's Water Polo Club Team	YES
University of Iowa Table Tennis Club	YES
University of Iowa Taekwondo Club	YES
University Theatres Student Representatives	YES
Urban and Regional Planning Student Association	YES
USITT Student Chapter	YES
UStart	YES
Vegan Society U Iowa	YES
Vertical Cinema	YES
Veterans Association (U of I)	YES
Veteran's Legal Association	YES
Vietnamese Student Association	YES
Voices of Soul	YES

Volleyball (Women's LadyHawk)	YES
Walk It Out	YES
Wall-Breakers	YES
Water Polo Club (U of I - Women's)	YES
Water Ski Team (U of I)	YES
Werewolf Club	YES
Wilderness Medicine Interest Group	YES
Wishmakers (University of Iowa)	YES
Women in Business	YES
Women in Computing Sciences	YES
Women in Science and Engineering (WISE) Ambassadors	YES
Women's Club Basketball	YES
Women's Ice Hockey	YES
World Languages Graduate Organization	YES
Wrestling Club (Iowa)	YES
Young Americans for Liberty	YES
Young Democratic Socialists at Iowa	YES
Young Life	STOPPED, PENDING LITIGATION
Young Women for America at Iowa	YES
Zeta Beta Tau	YES
Zeta Phi Beta Sorority, Inc.	YES
Zeta Tau Alpha	YES

KEY
 Spiritual & Religious Organization
YES = has submitted compliant constitution

Organization Name	Compliance as of 02/06/2019
Fraternal Values Society	NO LONGER REGISTERED - based on lack of student interest
Kappa Alpha Psi	NO LONGER REGISTERED - suspended (min. of 4 years) for violating UI policies unrelated to Human Rights Clause
Delta Chi	NO LONGER REGISTERED - suspended (min. of 4 years) for violating UI policies unrelated to Human Rights Clause
Kappa Sigma	NO LONGER REGISTERED - suspended (min. of 4 years) for violating UI policies unrelated to Human Rights Clause
Sigma Nu	NO LONGER REGISTERED - suspended (min. of 4 years) for violating UI policies unrelated to Human Rights Clause
Sigma Alpha Epsilon	NO - Fail to submit compliant governing docs and has been deregistered
Malaysian Student Society	NO - Fail to submit compliant governing docs and has been deregistered
To Write Love on Her Arms at The University of Iowa	NO - Fail to submit compliant governing docs and has been deregistered
Institute of Electrical and Electronic Engineers	NO - Fail to submit compliant governing docs and has been deregistered
Phi Beta Lambda	NO - Fail to submit compliant governing docs and has been deregistered
Persatuan Mahasiswa Indonesia di Amerika Serikat (Indonesian Student Organization)	NO - Fail to submit compliant governing docs and has been deregistered
German Club	NO - Fail to submit compliant governing docs and has been deregistered
Japanese Students and Scholars Club	NO - Fail to submit compliant governing docs and has been deregistered
Revolution Dance Company	NO - Fail to submit compliant governing docs and has been deregistered
Code the Change	NO - Fail to submit compliant governing docs and has been deregistered
MEDLIFE (Medicine, Education and Development for Low Income Families Everywhere)	NO - Fail to submit compliant governing docs and has been deregistered
CMA EDU	NO - Fail to submit compliant governing docs and has been deregistered
Cookie Dokie	Requested De-Registration
NASP Graduate Student Organization	Requested De-Registration
Global Buddies	Requested De-Registration
Students Today, Leaders Forever	Requested De-Registration
Baha'i Campus Association	Failed to Re-register
Ask Prayor Ministry	Failed to Re-register
2nd Amendment Law Group	Failed to Re-register
Asian Fitness Association	Failed to Re-register
Cardiothoracic Surgery Interest Group	Failed to Re-register
Economics Forum	Failed to Re-register
English Club	Failed to Re-register
FeelGood	Failed to Re-register
Feminist Union	Failed to Re-register
Filipino American Student Association	Failed to Re-register
Hawkeyes for DREAM Iowa	Failed to Re-register
Health and Wellness Society	Failed to Re-register
Herky C.A.R.E.S.	Failed to Re-register
Iconic and Chic Gazette - The	Failed to Re-register
National Association of Women MBAs	Failed to Re-register
Perfusion Interest Organization	Failed to Re-register
Photography Club (UI)	Failed to Re-register
President's Leadership Society	Failed to Re-register
Saudi Students Club	Failed to Re-register
Student Golf Club (Iowa)	Failed to Re-register
United Asian Collective	Failed to Re-register
Agape Chinese Student Fellowship	Stopped review due to pending BlinC/InterVarsity litigation
Athletes in Action	Stopped review due to pending BlinC/InterVarsity litigation
Bridges International (UI Chapter)	Stopped review due to pending BlinC/InterVarsity litigation
Business Leaders in Christ	Stopped review due to pending BlinC/InterVarsity litigation
Campus Bible Fellowship	Stopped review due to pending BlinC/InterVarsity litigation
Campus Christian Fellowship	Stopped review due to pending BlinC/InterVarsity litigation
Chabad Jewish Student Association	Stopped review due to pending BlinC/InterVarsity litigation
Chi Alpha Christian Fellowship	Stopped review due to pending BlinC/InterVarsity litigation
Chinese Student Christian Fellowship	Stopped review due to pending BlinC/InterVarsity litigation
Christian Legal Society	Stopped review due to pending BlinC/InterVarsity litigation
Christian Medical Association	Stopped review due to pending BlinC/InterVarsity litigation
Christian Pharmacy Fellowship	Stopped review due to pending BlinC/InterVarsity litigation
Cru	Stopped review due to pending BlinC/InterVarsity litigation
Geneva Campus Ministry	Stopped review due to pending BlinC/InterVarsity litigation
Hillel (University of Iowa)	Stopped review due to pending BlinC/InterVarsity litigation
Imam Mahdi Organization	Stopped review due to pending BlinC/InterVarsity litigation
International Neighbors at Iowa	Stopped review due to pending BlinC/InterVarsity litigation
InterVarsity Graduate Christian Fellowship	Stopped review due to pending BlinC/InterVarsity litigation
J. Reuben Clark Law Society	Stopped review due to pending BlinC/InterVarsity litigation
Letter-day Saint Student Association	Stopped review due to pending BlinC/InterVarsity litigation
Love Works	Stopped review due to pending BlinC/InterVarsity litigation

EXHIBIT	DATE: 3/10/19
19	
DEPONENT NAME: Kutchner	

ATTACHMENT A

BlinC-Def 023184

Lutheran Campus Ministry
 Stopped review due to pending BLinC/InterVarsity litigation
 Multicultural Undergrad Hawkeye InterVarsity
 Stopped review due to pending BLinC/InterVarsity litigation
 Muslim Students Association
 Stopped review due to pending BLinC/InterVarsity litigation
 Newman Catholic Student Center
 Stopped review due to pending BLinC/InterVarsity litigation
 Orthodox Christian Fellowship
 Stopped review due to pending BLinC/InterVarsity litigation
 Ratio Christi
 Stopped review due to pending BLinC/InterVarsity litigation
 Salt Company - The
 Stopped review due to pending BLinC/InterVarsity litigation
 Sikh Awareness Club
 Stopped review due to pending BLinC/InterVarsity litigation
 St. Paul's University Center
 Stopped review due to pending BLinC/InterVarsity litigation
 Tau Omega Catholic Service Fraternity
 Stopped review due to pending BLinC/InterVarsity litigation
 Twenty Four Seven
 Stopped review due to pending BLinC/InterVarsity litigation
 Young Life
 YES
 Stopped review due to pending BLinC/InterVarsity litigation

5050 In 2020 @ Iowa
 YES
 AAUW at Iowa
 YES
 Actia Fraternity
 YES
 Academy of Managed Care Pharmacy (AMCP) Student Chapter at the University of Iowa (UI)
 YES
 Active Minds at The University of Iowa
 YES
 Actuarial Science Club
 YES
 Advocates for Cross Cultural Experiences (ACCE)
 YES
 African Student Association
 YES
 ALMA (Association of Latinos Moving Ahead)
 YES
 Alpha Chi Omega
 YES
 Alpha Delta Pi
 YES
 Alpha Epsilon Phi
 YES
 Alpha Epsilon Pi
 YES
 Alpha Kappa Alpha Sorority, Inc.
 YES
 alpha Kappa Delta Phi
 YES
 Alpha Kappa Psi Professional Business Fraternity
 YES
 Alpha Phi
 YES
 Alpha Phi Alpha
 YES
 Alpha Phi Omega-Omicron (APO)
 YES
 Alpha Sigma Phi
 YES
 Alpha Tau Omega
 YES
 Alpha Xi Delta
 YES
 Amateur Radio Club (University of Iowa)
 YES
 American Academy of Pediatric Dentistry
 YES
 American Advertising Federation (formerly known as Students in Advertising)
 YES
 American Association of Petroleum Geologists
 YES
 American Association of Public Health Dentistry University of Iowa Student Chapter
 YES
 American Association of Women Dentists
 YES
 American Chemical Society Student Chapter (U of I)
 YES
 American College of Clinical Pharmacy Student Chapter (University of Iowa)
 YES
 American College of Veterinary Pharmacists
 YES
 American Constitutional Society for Law and Policy, University of Iowa College of Law Chapter
 YES
 American Institute of Aeronautics and Astronautics
 YES
 American Institute of Chemical Engineers - University of Iowa Student Chapter
 YES
 American Marketing Association (U of I chapter)
 YES
 American Medical Women's Assoc - UI Sidt Branch (AMWA)
 YES
 American Pharmacists Association - Academy of Student Pharmacists
 YES
 American Rehabilitation Counseling Association (UI)
 YES
 American Sign Language Club (ASL Club)
 YES
 American Society of Civil Engineers (ASCE)
 YES
 American Society of Mechanical Engineers
 YES
 American Wind Energy Association (Student Chapter)
 YES
 Amnesty International (U of I)
 YES
 Anime and Manga Club
 YES
 Anime, Comics & Games Association
 YES
 Anthropology Club (University of Iowa)
 YES
 Anthropomorphic Furry Friends
 YES
 Arab Students Association
 YES
 Art Hawks
 YES
 Artlineers
 YES
 Asian Pacific American Medical Student Association
 YES
 Asian Pacific American Student Association (U of I)
 YES
 Associated Residence Halls (ARH)
 YES
 Association for Computing Machinery Student Chapter
 YES

Association for India's Development-IOWA	YES
Association for Multicultural Scientists	YES
Association of Graduate Nursing Students	YES
Association of Graduate Students in English (AGSE)	YES
Association of Nursing Students (UANIS)	YES
Association of Pre-Physician Assistant Students	YES
Astronomy Club	YES
Auto Club	YES
B Sides	YES
Backpack Project	YES
Bauminton Club (U of I)	YES
Ballet Club at Iowa	YES
Baseball Club (Iowa Hawkeye)	YES
Bass Fishing Team (Iowa)	YES
Be The Match on Campus-UI	YES
Bertrand Russell Society - Iowa Chapter	YES
Best Buddies	YES
Beta Theta Pi	YES
Big Brothers Big Sisters at Iowa	YES
Bijou Theater	YES
Bike Friends (University of Iowa) (Formerly Recreational Bicycling Club - UI)	YES
Biochemistry Majors Club (University of Iowa)	YES
Biological Interests Organization (University of Iowa)	YES
Biomedical Engineering Student Society	YES
Biostatistics Student Organization	YES
Black Law Student Association, Alexander G. Clark Sr. & Jr. Chapter (University of Iowa College of Law)	YES
Black Student Union	YES
Board Game Club	YES
Body Image and Eating Disorder Awareness	YES
Book of the Month Club	YES
Bowling Club (U of I)	YES
BrandYou Fashion Channel	YES
Brazilian Jiu-Jitsu Club (Hawkeye)	YES
Breakers (U of I)	YES
Bruce Gronbeck Rhetoric Society	YES
Camp Adventure Youth Services	YES
Camp Kesem	YES
Campus Activities Board (CAB)	YES
Caribbean Student Association	YES
Carver College of Medicine Student Government	YES
Carver College of Medicine-Medicus Mentorship Program	YES
CHAMARG at Iowa	YES
Chess Club	YES
Chi Epsilon	YES
Chi Omega	YES
Chi Sigma Iota Counseling Academic & Prof. Honor Society Int'l; Rho Upsilon Chapter	YES
Child Life Student Association (UI)	YES
Children of the Clay - The (Formerly Ceramics Society)	YES
Chinese Dance Club	YES
Chinese in Iowa City	YES
Chinese Music Club	YES
Chinese Students and Scholars Association (CSSA)	YES
Chronic Illness Alliance	YES
Circle K International	YES
Clothing Closet at Iowa	YES
Club Cheerleading	YES
College Diabetes Network at Iowa	YES
College of Education Graduate Student Executive Committee	YES
College of Law Federalist Society	YES
College of Medicine Emergency Medicine Interest Group (University of Iowa)	YES
College of Pharmacy Student Leadership Council	YES
College Republicans	YES
Colleges Against Cancer (U of I)	YES
Collegiate 4-H (The University of Iowa)	YES
Communication Studies Graduate Student Association	YES
Communication Studies Student Association	YES

Competitive Club Golf Team (Iowa)	YES
Computer Comfort	YES
Continental Crossings	YES
Cosplay Club at Iowa	YES
Craft, Critique, Culture Conference Planning Committee	YES
Cricketer Club	YES
Crisis Center	YES
Dance Club (University of Iowa)	YES
Dance Marathon	YES
Dean's Student Advisory Committee	YES
Debate Club (U of I)	YES
Decowin Blood Center Student Organization (University of Iowa)	YES
Delta Delta Delta	YES
Delta Gamma	YES
Delta Lambda Phi	YES
Delta Phi Lambda	YES
Delta Sigma Phi	YES
Delta Sigma Pi (Professional Business Fraternity)	YES
Delta Sigma Theta	YES
Delta Tau Delta	YES
Delta Upsilon	YES
Delta Zeta	YES
Disc Golf Club	YES
Earthwords	YES
Eats And Treats	YES
Ed on Campus	YES
Electrochemical Society Student Chapter at Iowa	YES
Emergency Medical Services Student Interest Organization (University of Iowa)	YES
Enactus at Iowa	YES
Engineering Student Council	YES
English Society (University of Iowa)	YES
Environmental Coalition (U of I)	YES
Environmental Law Society	YES
Epidemiology Student Association	YES
EPX Studio	YES
EQUAL Meds (formerly Med Iowa's Queer Students (MEDIQS))	YES
eSports Club at Iowa	YES
Eta Sigma Phi National Classics Honor Society	YES
Euchre Club at Iowa	YES
Exchanges	YES
Fair Trade at Iowa	YES
Family Medicine Interest Group	YES
Federal Reserve Challenge at Iowa	YES
Female Alliance of Civil Engineers	YES
Fencing Club (U of I)	YES
Fight Inclined Student Thespians	YES
Figure Skating Club (Black and Gold)	YES
Financial Management Association	YES
Fine Arts Council	YES
FIRST Alumni Club	YES
First Generation Iowa	YES
FLARES (Foreign Language Acquisition Research and Education Students)	YES
Food Pantry at Iowa	YES
Foods Magazine	YES
From Cover To Cover	YES
Futures Trading Challenge	YES
Gamma Iota Sigma	YES
Gamma Phi Beta	YES
Gamma Rho Lambda	YES
Gardeners (University of Iowa)	YES
Global Health Club	YES
Golden Key International Honour Society	YES
Graduate & Professional Student Government	YES
Graduate Association of Political Science	YES
Graduate History Society (GHS)	YES
Graduate Organization of Higher Education and Student Affairs (GOHESA)	YES

Graduate Philosophical Society (U of I)	YES
Graduate Social Work Student Association	YES
Graduate Student Anthropology Association (U of I)	YES
Graduate Student Senate	YES
Graduate Women in Science - Iowa City Chapter (previously GWIS - Iowa City)	YES
Greater China Business Association	YES
Guitar Club at Iowa	YES
Habitat for Humanity Campus Chapter (U of I)	YES
HackIowa	YES
Hallyu@Iowa	YES
Hawkapellas - Iowa	YES
Hawkeye Athletic Training Association (HATA)	YES
Hawkeye Ballroom Dance Company	YES
Hawkeye Caucus	YES
Hawkeye Flying Club	YES
Hawkeye History Corps	YES
Hawkeye Model UN delegation	YES
Hawkeye Optimist Chapter	YES
Hawkeye Sportswives (University of Iowa)	YES
Hawkeye Water for Change! (Formerly: Hawkeye Water to Thrive)	YES
Hawkeyes Fighting Alzheimer's	YES
Hawkeyes for Humanity	YES
Hawkeyes for Israel	YES
Hawkeyes Plus Events - HYPE (formerly) Student Event Planners Association - UI	YES
Hawks for Choice	YES
Hawks for McGuire	YES
Hawks Nest	YES
HawkTrade	YES
Heart Workshop	YES
HFEES Student Chapter at Iowa	YES
Hispanic Dental Association (Iowa Chapter)	YES
Hispanic/Latino Law Student Association	YES
Homecoming Council	YES
Hong Kong Student Association	YES
House of Lords: a space for Black Queer Individuals	YES
Human Rights Student Collective	YES
Human Trafficking Initiative	YES
IC RED	YES
i-Envision Entrepreneurship	YES
Immunity Campaign	YES
Indian Student Alliance (ISA)	YES
INFORMS Iowa Student Chapter	YES
Institute of Industrial and Systems Engineers (IISE)	YES
Integrative Medicine Interest Group	YES
Intellectual Property Law Society	YES
Interfraternity Council (IFC)	YES
International Genetically Engineered Machine	YES
International Law Society	YES
International Law Student Association (formerly International Law-school Student Association)	YES
International Student Outdoor Recreation Association	YES
Intersection	YES
InvestHer	YES
Iowa Aigri	YES
Iowa American Student Dental Association (IASDA)	YES
Iowa Anndi	YES
Iowa Comic Book Club	YES
Iowa Edge Student Organization - The	YES
Iowa Formula	YES
Iowa Forum for Graduate Medievalists	YES
Iowa Health Administration Club	YES
Iowa Improv Club	YES
Iowa Journal of Cultural Studies	YES
Iowa Kendo Kumido Club	YES
Iowa Marine Autonomous Racing Club	YES
Iowa Men's Hockey	YES
Iowa National Lawyers Guild	YES

Iowa Neuroscience Club	YES
Iowa Print Group	YES
Iowa Quiz Bowl	YES
Iowa Student Association of Healthcare Leaders	YES
Iowa Student Athlete Advisory Committee	YES
Iowa Student Bar Association	YES
Iowa Student Chapter of the American String Teachers Association	YES
Iowa Student Medical Research Club	YES
Iowa Student Psychology Association (ISPA)	YES
Iowa Students for Refugees	YES
Iowa Surgical Interest Group	YES
Iowa Young Americans for Freedom Chapter	YES
Iowa-Illinois Industrial Hygiene Student Association (IISHA)	YES
Japan Karate-Do Organization of University of Iowa	YES
Jazz Club	YES
Journal of Corporation Law	YES
Journal of Gender, Race & Justice	YES
Journalism and Mass Communication Graduate Student Association	YES
Judo Club (University of Iowa)	YES
Juggalos (U of I)	YES
Kappa Alpha Theta	YES
Kappa Kappa Gamma	YES
Kappa Psi Pharmaceutical Fraternity	YES
Knitting Club (U)	YES
Korean Conversation Group	YES
Korean U Iowa Students Association	YES
KRUJFM	YES
Lacrosse (U of I - Men's)	YES
Lacrosse (U of I - Women's)	YES
Lambda Chi Alpha	YES
Lambda Theta Nu Sorority, Inc.	YES
Lambda Theta Phi Latin Fraternity, Inc.	YES
Latino/o Graduate Student Association	YES
Latino Medical Student Association - University of Iowa Roy J. & Lucille A. Carver College of Medicine	YES
League of Legends Club (U)	YES
League of United Latin American Citizens Collegiate Council #373	YES
Leopold Society	YES
LGBT Advocates for Public Health Equity	YES
Library & Info Science Std Chapter of American Lib Assoc. (LISSC)	YES
Master of Business Administration Association (MBAA)	YES
Math Graduate Board (MGB)	YES
Media Entertainment & Lifestyle	YES
Medicus Pre-Medical Society	YES
Microbiology Undergraduate Student Association	YES
Middle East Law Students Association	YES
MinoHul@Iowa	YES
Minority Association of Pre-medical Students	YES
Mock Trial Club (U of I)	YES
Moneythink	YES
MPR Dance Crew	YES
Multicultural Business Student Association	YES
Multicultural Greek Council	YES
Multicultural Nursing Association	YES
Multi-Ethnic Engineering And Science Association	YES
Multiracial Student Association	YES
Musiology Society (University of Iowa)	YES
Narwhal Finance Group	YES
National Alliance on Mental Illness on Campus at Carver College of Medicine.	YES
National Association for Music Education	YES
National Association for the Advancement of Colored People (U) Chapter of NAACP	YES
National Association of Black Journalists - Unity (U)	YES
National Community Pharmacists Association	YES
National Pan-Hellenic Council (NPHC)	YES
National Residence Hall Honorary	YES
National Retail Federation Student Association	YES
National Science Teachers Association Chapter at Iowa	YES

National Society of Black Engineers (NSBE)	YES
National Society of Collegiate Scholars	YES
National Student Speech Language Hearing Association (NSSLHA)	YES
Native American Student Association	YES
Nepalese Student Association	YES
Net Impact	YES
Net Impact Ulowa	YES
Neuroscience Journal Club	YES
Nightingale Writers' Group	YES
NOBCChE (National Organization for the Professional Advancement/Black Chemists & Chemical Engineers)	YES
Old Gold A Cappella	YES
Olympic Weightlifting Club (University of Iowa)	YES
Omega Chi Epsilon	YES
Omicron Delta Kappa	YES
ONE at University of Iowa	YES
Operation Smile at Iowa	YES
Order of Omega	YES
Organization for the Active Support of International Students (OASIS)	YES
Organization for Women Law Students & Staff (OWLSS)	YES
Orthopedic Surgery Interest Group	YES
oSTEM@Iowa	YES
Outlaws	YES
Pain Management, Substance Use Disorders, Palliative Care (U of I)	YES
Pakistani Student Association	YES
Panhellenic Council (PHC)	YES
PAWS - U (Promoting Animal Welfare in Society)	YES
Pediatric Pharmacy Advocacy Group at the University of Iowa	YES
Percussion Society (U of I)	YES
Persian Student Organization	YES
Pharmacy Ambassadors	YES
Pharmacy Communicators Association	YES
Phi Alpha Delta Law Fraternity, International Hammond Chapter	YES
Phi Alpha Delta Pre-Law Fraternity	YES
Phi Beta Chi	YES
Phi Beta Sigma	YES
Phi Delta Chi Pharmacy Fraternity	YES
Phi Delta Theta	YES
Phi Eta Sigma (Freshman Honor Society)	YES
Phi Gamma Delta (FGU)	YES
Phi Gamma Nu Professional Business Fraternity	YES
Phi Kappa Psi	YES
Phi Kappa Theta	YES
Phi Lambda Sigma	YES
Phi Mu Alpha Sinfonia Men's Music Fraternity, Iota Gamma Chapter	YES
Phi Sigma Pi National Honor Fraternity	YES
Physical Therapy Student Organization	YES
Pi Alpha Phi	YES
Pi Beta Phi	YES
Pi Kappa Alpha (PIKE)	YES
Pi Kappa Phi	YES
Pi Sigma Alpha - Political Honors Society at Iowa	YES
PMBA Student Association, Des Moines (University of Iowa)	YES
Powerlifting (University of Iowa)	YES
Pre-Dental Club (U of I)	YES
Pre-Health International Association	YES
Pre-Occupational Therapy Club	YES
Pre-Optometry Club (U of I)	YES
Pre-Physical Therapy Organization	YES
Pre-Veterinary Club	YES
Product Design Studio	YES
Psi Chi International Honor Society in Psychology	YES
Public Relations Student Society of America (PRSSA)	YES
Quidditch Club	YES
Radiation Sciences Student Organization	YES
WAYS of REACH	YES
Reading OUT in Business	YES

Real Estate Club (The)	YES
Red Shamrock Student Organization	YES
Religion Graduate Students Organization	YES
Rex Montgomery Physician Assistant Student Society	YES
Rho Chi Society: Delta Chapter	YES
Rho Lambda	YES
Riverfun	YES
Robotics Club (University of Iowa)	YES
Rock Climbing Club	YES
Roosevelt Network	YES
Rowing Club (Men's)	YES
Rugby Club at Iowa (Women's)	YES
Running Club (University of Iowa)	YES
Russian-Speaking Students and Scholars Association	YES
Sailing Club (Iowa)	YES
Sales Engineering Club	YES
Salsa Dance Club	YES
SCOPE Productions (Student Commission on Programming Entertainment)	YES
Secular Students at Iowa	YES
Semper Fidelis Society	YES
Shooting Sports Club	YES
Sigma Alpha Iota - Zeta Epsilon	YES
Sigma Alpha Lambda	YES
Sigma Chi	YES
Sigma Lambda Beta	YES
Sigma Lambda Gamma	YES
Sigma Nu Tau Entrepreneurship Honors Society	YES
Sigma Phi Epsilon	YES
Sigma Pi	YES
Sigma Tau Delta International English Honors Society, Alpha Tau Iota Chapter of Iowa	YES
SistaSpeak	YES
Ski & Snowboard Club (U of I)	YES
Slavic Student Alliance	YES
Soccer (Iowa Women's)	YES
Social Work Student Association	YES
Society for Human Resource Management	YES
Society of Automotive Engineers	YES
Society of Black Graduate & Professional Students (BGCAPS)	YES
Society of Composers, Inc. Student Chapter	YES
Society of Hispanic Professional Engineers	YES
Society of Physics Students	YES
Society of Women Engineers	YES
Softball Club (University of Iowa)	YES
Sound Awareness for Everyone (University of Iowa - student affiliate group)	YES
South Asian Student Alliance	YES
Special Olympics (University of Iowa Chapter)	YES
Spectrum UI	YES
Sport and Recreation Management Club	YES
Sports Law Society of the University of Iowa	YES
Sports Stocks	YES
Sri Lankan Students' Association (SLSA)	YES
STAR (Students To Assist Recruitment)	YES
Stars and Stripes Club	YES
Starts With Soap	YES
Strength in Numbers	YES
Student Academy of Audiology	YES
Student Advancement Network	YES
Student Advocates for Planned Parenthood	YES
Student Iowa School Counseling Association	YES
Student National Medical Association	YES
Student National Pharmaceutical Association	YES
Student Photography Organization	YES
Student Society of Health-System Pharmacists (University of Iowa)	YES
Student United Way	YES
Student Video Productions (SVP)	YES

Students Against Casteism	YES
Students Care	YES
Students for Boys and Girls Club of Iowa City	YES
Students for Human Rights	YES
Students for Interprofessional Practice and Education (formerly Students for Interprofessional Education)	YES
Students for Life	YES
Students for Pat Wronkiewicz	YES
Students for Reynolds	YES
Students in Design (UI)	YES
Students in Technology and Sciences	YES
Students International Meditation Society	YES
Students Supporting Israel	YES
Swing Dance Club	YES
Tabletop RPG Organization (The U of I)	YES
Taiwanese Student Association	YES
Tau Beta Pi	YES
Tau Kappa Epsilon (TKE)	YES
Tau Sigma Military Dental Club	YES
Teddy Bear Clinic	YES
Tennis Club (Hawkeye)	YES
Tennis Club (International)	YES
Thal Student Association	YES
The Cell-Yaks Club	YES
The Gymnastics Club at Iowa	YES
Therapeutic Recreation Student Association	YES
Theta Tau-Professional Engineering Fraternity	YES
Tippie Senate	YES
Tippie Students for Service (formerly Tippie Community Collective)	YES
Tippie Technology and Innovation Assoc.	YES
Track and Field Club (Iowa)	YES
Traditional Jujutsu Club (Iowa)	YES
Trans Alliance - UI	YES
Transfers Leading Change	YES
Translate Iowa Project - The	YES
Transnational Law & Contemporary Problems	YES
Triathlon Club (U of I)	YES
Turkish Student Association	YES
Turning Point USA	YES
Tzu Chi Collegiate Association	YES
UI Students for Disability Advocacy & Awareness (Formerly- Hawkeye Accessibility Ambassador Org)	YES
UISG (University of Iowa Student Government)	YES
UISight	YES
Ultimate Frisbee (Women's)	YES
Ultimate Frisbee Club (Iowa Hawkeye Men's)	YES
Under Your Wing	YES
Undergraduate Art History Society	YES
Undergraduate Dance Organization	YES
Undergraduate Political Science Association	YES
Undergraduate Public Health Organization	YES
Unified for Uganda	YES
United Nations Association (University of Iowa)	YES
University Democrats	YES
University of Iowa Men's Club Volleyball	YES
University of Iowa Men's Soccer Club	YES
University of Iowa Men's Water Polo Club Team	YES
University of Iowa Table Tennis Club	YES
University of Iowa Taekwondo Club	YES
University Theatres Student Representatives	YES
Urban and Regional Planning Student Association	YES
USITT Student Chapter	YES
USStart	YES
Vegan Society Ulowa	YES
Vertical Cinema	YES
Veterans Association (U of I)	YES
Veteran's Legal Association	YES
Vietnamese Student Association	YES

Voices of Soul	YES
Volleyball (Women's LadyHawk)	YES
Walk it Out	YES
Wall-Breakers	YES
Water Polo Club (U of I - Women's)	YES
Water Ski Team (U of I)	YES
Werewolf Club	YES
Wilderness Medicine Interest Group	YES
Wishmakers (University of Iowa)	YES
Women in Business	YES
Women in Computing Sciences	YES
Women in Science and Engineering (WISE) Ambassadors	YES
Women's Club Basketball	YES
Women's Ice Hockey	YES
World Languages Graduate Organization	YES
Wrestling Club (Iowa)	YES
Young Americans for Liberty	YES
Young Democratic Socialists at Iowa	YES
Young Woman for America at Iowa	YES
Zeta Beta Tau	YES
Zeta Phi Beta Sorority, Inc.	YES
Zeta Tau Alpha	YES

Title: CONSTITUTION OF WOMEN IN SCIENCE AND ENGINEERING
AMBASSADORS

Preamble:

WISE Ambassadors

Date:

May 6, 2010

May 2, 2010

Article I

Purpose:

The purpose of the Women in Science and Engineering Ambassadors is to expand and improve educational and professional opportunities for women in all fields of science, technology, engineering, and math. WISE Ambassadors use community outreach programs to teach young girls, to inspire their interests in science and technology, and to educate the community on the contributions of women in science and engineering.

Article II

Membership

a) In no aspect of its programs shall there be any difference in the treatment of persons on the basis of race, creed, color, religion, national origin, age, sex, pregnancy, disability, genetic information, status as a U.S. veteran, service in the U.S. military, sexual orientation, gender identity, associational preferences, or any other classification which would deprive the person of consideration as an individual. The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons. Eighty percent (80%) of this organization's membership must be composed of UI students.

b) Members are encouraged, but are not required, to be any of the following: a woman, a student in a science or engineering field, or interested in science and outreach to the community.

c) Different Classes of Membership:

A general member has to attend one meeting or event per school year.

A committee member is any general member that volunteers to help committee chairs plan events.

A committee chair oversees their area of involvement to plan and organize events. They must be a general member that volunteers to be a committee chair and is then voted in by other general members at the beginning of the fall semester of each year.

An officer is a general member that has been involved in the group for at least one school year. They volunteer for a position and are then voted in by other general members.

d) Members do not have to be selected or to apply to this organization. Anyone with an interest in joining should contact an officer, the advisor, or come to a meeting. Official Membership begins after the person attends one meeting or event. Revocation of

EXHIBIT	
20	
DEPONENT NAME:	DATE:
Kutcher	5/28/10

IVCF App. 2778

membership will only happen in extreme circumstances as determined by the advisor and the officers. One example of misconduct would be representing WISE Ambassadors and the University of Iowa in a negative way.

Article III

Officers and Duties

- a) **President:** The President will lead meetings, oversee committee chairs and other officers, and motivate members. The President also keeps the WISE office informed of the Ambassadors' activities. The President will also be in charge of maintaining a record of all Ambassadors activities for the year in a comprehensive binder that will be submitted to WISE at the end of the year.
- b) **Vice President/Treasurer:** the VP/Treasurer will lead meetings if the President is not available. They will also track past expenses and be the financial liaison from WISE Ambassadors to the WISE office. The VP will collect all Event Request Forms and ensure that they are filled out correctly before giving the forms to the WISE main office. The VP/Treasurer will also represent the Ambassadors at any UISG funding meetings or other required commitments.
- c) **Secretary:** The Secretary will take the meeting minutes at all meetings, maintain the ICON website, maintain the list of email addresses for all members, keep a record of participation for members, and inform all general members of meetings and events via email.
- d) **Public Relations:** The Public Relations Liaison will take pictures at WISE Ambassadors events, update the website, and inform the press about the organization's events.

To qualify for any of the officer positions listed above, a person must be a general member during the previous school year, must show enthusiasm toward the organization, and must be voted in by other general members.

A person can be nominated or volunteer to run for an officer position. Elections take place once a year, at the end of the spring semester in April or May during a scheduled meeting. Nominees will be announced at that meeting, and voting will take place for the following year's officers.

If a position is vacated before their term is complete, one of the remaining officers will notify all members of a meeting to nominate and vote in a new person.

If any member has concerns about an officer, they should speak to the President or the advisor to address the issue.

Article IV

Advisor

The Women in Science and Engineering (WISE) program at the University of Iowa employs a half-time graduate assistant whose duties include coordinating the WISE Peer Mentoring Program and facilitating the efforts of the WISE Ambassadors. The person in this position will provide administrative and organizational support to the WISE Ambassadors student organization, particularly in the areas of organizational, legal, and financial planning. An undergraduate student assistant is also employed by WISE and serves as a liaison between the student meetings of the Ambassadors and the WISE office staff. Occupants of both positions are selected and hired by the WISE Director, Chris Peterson Brus, who serves as the advisor for this student group.

Article V

Meetings

- a) Meetings are held twice monthly or as needed.
- b) Members will be notified by email one week in advance of special meetings.
- c) A quorum will consist of at least one officer or committee chair and three general members.
- d) Officers and committee chairs have the authority to call meetings.

Article VI

Elections

- a) Elections for officers for the following year are held once a year at the end of the spring semester in April or May. Elections for committee chairs are held once a year at the beginning of the fall semester in August or September.
- b) Members will be notified at least two weeks prior to elections.

Article VII

Finances

- a) Dues will not be collected for this organization.
- b) The elected treasurer and our advisor will be in charge of financial affairs.
- c) **WiSE Ambassadors** is required to deposit all receipts in and make disbursements through the Student Organization Business Office, Fraternity Business Services, or Recreational Services. Upon dissolution, state money and mandatory student fees revert back to the granting organization. Inactive organizations will be considered dissolved after five years of no account activity. Revenue generated dollars or “00 funds” must be divided as stated in this Constitution and carried out by our leadership. Our organization’s remaining revenue generated dollars or “00 funds” will be divided or disbursed to WiSE Department Office and at the Current WiSE Department Chair discretion. If this organization has dissolved and revenue generated dollars or “00 funds” have not been divided as stated in this Constitution by five years from last account activity, funds in our “00 account” will revert to an account specified for this purpose within student government(s). These funds will

then be available for distribution through student government(s) guidelines in accordance with University of Iowa policy.

Article VIII

Amendments

- a) Eligible voting members will be informed of the proposed amendment first by email and second by reading at the next meeting.
- b) A 2/3 vote is needed to ratify an amendment.
- c) Note that all amendments or changes to this constitution must be submitted to the Student Organization Liaison for approval.

Article IX

Ratification

Adopting of this constitution will happen at a scheduled meeting. Ratification will pass by a majority vote of general members.