

90589  
A005

Dept. # 24 Assigned WSS

1 R. Alexander Pilmer, P.C. (SBN 166196)  
2 Jeffrey S. Sinek (SBN 135508)  
3 KIRKLAND & ELLIS LLP  
4 333 South Hope Street  
5 Los Angeles, California 90071  
6 Telephone: (213) 680-8400  
7 Facsimile: (213) 680-8500  
8 Email: [alexander.pilmer@kirkland.com](mailto:alexander.pilmer@kirkland.com)  
9 [jeff.sinek@kirkland.com](mailto:jeff.sinek@kirkland.com)

6 Michael D. Lieberman (SBN 298415) (*Pro Hac Vice* to be filed)  
7 KIRKLAND & ELLIS LLP  
8 655 Fifteenth Street, N.W.  
9 Washington, D.C. 20005-5793  
10 Telephone: (202) 879-5169  
11 Facsimile: (202) 879-5200  
12 Email: [michael.lieberman@kirkland.com](mailto:michael.lieberman@kirkland.com)

10 Attorneys for Plaintiffs  
11 OMICRON CHAPTER OF KAPPA ALPHA THETA  
12 SORORITY; ALPHA UPSILON CHAPTER, SIGMA CHI  
13 FRATERNITY; GAMMA TAU CHAPTER OF THE  
14 BETA THETA PI FRATERNITY; ALPHA NU  
15 CHAPTER OF THE THETA XI FRATERNITY; BETA  
16 SIGMA CHAPTER OF THE TAU KAPPA EPSILON  
17 FRATERNITY

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
16 COUNTY OF LOS ANGELES

17 OMICRON CHAPTER OF KAPPA ALPHA  
18 THETA SORORITY; ALPHA UPSILON  
19 CHAPTER, SIGMA CHI FRATERNITY;  
20 GAMMA TAU CHAPTER OF THE BETA  
21 THETA PI FRATERNITY; ALPHA NU  
22 CHAPTER OF THE THETA XI  
23 FRATERNITY; BETA SIGMA CHAPTER OF  
24 THE TAU KAPPA EPSILON FRATERNITY;  
25 AND DOES 1 - 10;

22 Plaintiffs,

23 vs.

24 UNIVERSITY OF SOUTHERN CALIFORNIA,  
25 Defendant.

Case No. BC

BC 7 1 1 1 5 5

COMPLAINT FOR VIOLATION OF  
LEONARD LAW, U.S. CONSTITUTION,  
CALIFORNIA CONSTITUTION

FILED  
Superior Court of California  
County of Los Angeles

JUN 22 2018

Sherril R. Carter, Executive Officer/Clerk  
By [Signature] Deputy  
Nancy Alvarez

ENDORSED: \$435.00  
LAST - FILINGS  
ACCT: 90125-79530  
06/22/2018 13:55  
CITY/CASE: BC711155  
RECH: CCH451233061

ORIGINAL

COMPLAINT FOR VIOLATION OF LEONARD LAW, U.S. CONSTITUTION, CALIFORNIA CONSTITUTION

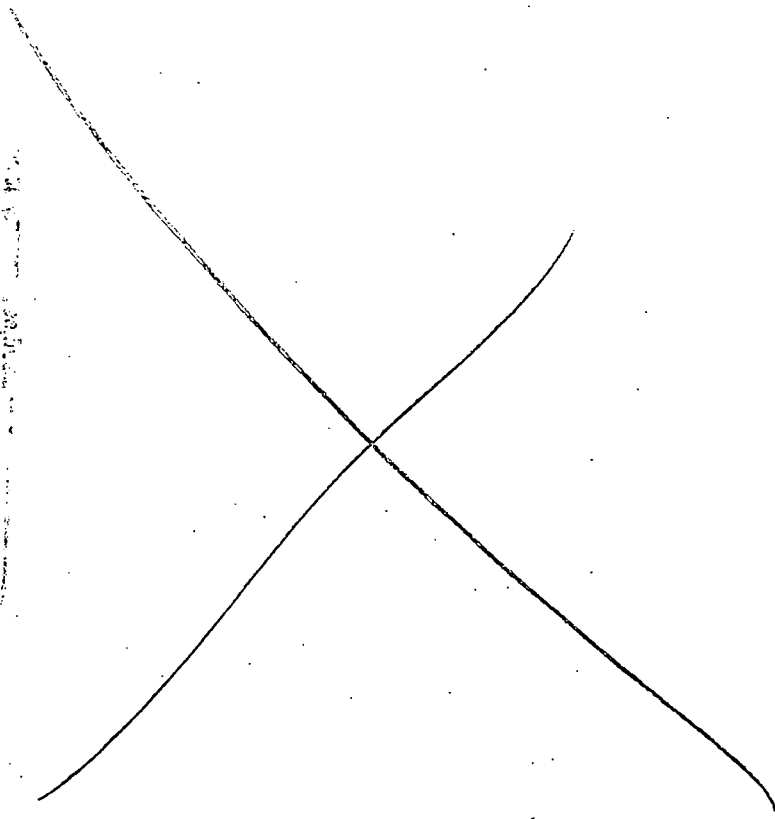
CREDIT TO ACCT OF NAMED PAYEE

06/22/2018

CIT/CASE: BC711155  
LEA/DEF#:

RECEIPT #: CCH451233061  
DATE PAID: 06/22/18 01:55 PM  
PAYMENT: \$435.00 310

RECEIVED:  
CHECK: \$435.00  
CASH: \$0.00  
CHANGE: \$0.00  
CARD: \$0.00



**INTRODUCTION**

**“In all cases, the rights of students under the First Amendment to the Constitution, as applied by California law, will always be protected.”**

University of Southern California, SCampus Part D “Free Expression and Dissent,” Section 2.

1. USC pledges to “always protect” the First Amendment rights of its students, as California law requires it to do. It should put an asterisk next to its promise because, for incoming first-year students, USC proposes now to institute a ban on their First Amendment freedom-of-association rights if they want to join a sorority or a fraternity. What is even worse, USC discriminates against these students, as USC would allow all other incoming students to freely associate with whomever they choose. The Constitution does not allow for such discrimination against students or groups the university suddenly appears to view with disfavor.

2. Plaintiffs bring this action on behalf of themselves and their current and future members to enjoin USC’s threatened violation of California’s Leonard Law, California Education Code Section 94367, which forbids USC from infringing their First Amendment freedom-of-association rights.

**THE PARTIES**

3. Plaintiff Omicron Chapter of Kappa Alpha Theta Sorority is an unincorporated association made up entirely of female undergraduate college students who attend the University of Southern California.

4. Plaintiff Alpha Upsilon Chapter of the Sigma Chi Fraternity is an unincorporated association made up entirely of male undergraduate college students who attend the University of Southern California.

5. Plaintiff Gamma Tau Chapter of the Beta Theta Pi Fraternity is an unincorporated association made up entirely of male undergraduate college students who attend the University of Southern California.

6. Plaintiff Alpha Nu Chapter of the Theta Xi Fraternity is a California corporation made up entirely of male undergraduate college students who attend the University of Southern California.

26  
27  
28

1 7. Plaintiff Beta Sigma Chapter of the Tau Kappa Epsilon Fraternity is an unincorporated  
2 association made up entirely of male undergraduate college students who attend the University of  
3 Southern California.

4 8. Plaintiffs Does 1 through 10 are currently unknown and thus are named fictitiously.

5 9. Defendant University of Southern California (hereinafter USC) is a not-for-profit private  
6 research university.

7 **JURISDICTION AND VENUE**

8 10. Defendant USC is subject to personal jurisdiction in the State of California and in Los  
9 Angeles County because the acts and omissions by USC alleged herein occurred in or caused harm to  
10 Plaintiffs in Los Angeles, California and USC's principal place of business is in Los Angeles,  
11 California.

12 11. Venue is proper in Los Angeles County because the harm complained of in this  
13 complaint occurred in this County.

14 **FACTUAL BACKGROUND**

15 12. Sororities and fraternities "have been an instrumental part of the USC experience dating  
16 back to 1889." Ex. 1 (9/29/17 A. Carry Letter). As USC acknowledges, sororities and fraternities  
17 "enhance the student experience at USC by providing spaces for personal connection,  
18 brotherhood/sisterhood, academic support and philanthropic engagement." *Id.* Moreover, USC concedes  
19 that "fraternities and sororities are an integral part of the campus community and can have a positive  
20 impact for members and non-members." *Id.*

21 13. Plaintiff Omicron Chapter of Kappa Alpha Theta sorority (hereinafter Kappa Alpha  
22 Theta), first opened a chapter at USC in 1887. It was the first women's fraternity in the State of  
23 California, and was founded by Jenny Allen Bovard, the wife of Marion M. Bovard, the first President  
24 of USC. It shut down temporarily, but since reopening in 1903, Kappa Alpha Theta has been a continual  
25 presence at USC. Nationally, alumnae from Kappa Alpha Theta include former First Lady Laura Bush,  
26 Sheryl Crow, fashion designer Tori Burch, philanthropist and actress Marlo Thomas, actress Ann-  
27 Margret, and Melinda Gates. Alumnae from USC include Kathleen Leavy McCarthy (the Vice Chair of  
28 the USC Board of Trustees) and Cindy McCain.

1           14.    Kappa Alpha Theta engages in various forms of expressive association. For example,  
 2 their philanthropic endeavors include support for the Court Appointed Special Advocates (CASA) and  
 3 providing mentors for abused, abandoned and neglected children, and serving as a voice for children  
 4 during the judicial process. Omicron Chapter also provides prom dresses for young women of CASA. In  
 5 addition, members of Kappa Alpha Theta provide various forms of community service, including  
 6 volunteering each Friday at a local preschool. Kappa Alpha Theta participates in these endeavors not  
 7 only to provide assistance to those in need, but also to instill the values of charity, philanthropy, and  
 8 public service in each of its members. Regular participation in these activities encourages moral  
 9 development and provides young women with a value system that helps them make ethical choices  
 10 throughout their time at USC and over the course of their lives.

11           15.    When a young woman joins Kappa Alpha Theta, she is provided the opportunity to  
 12 engage in various leadership opportunities. These include everything from being on a committee, a  
 13 committee chair, an officer of the chapter as well as the possibility of taking on a leadership role within  
 14 the Panhellenic Council. The committees and officers within Kappa Alpha Theta have responsibilities  
 15 that vary from being in charge of recruitment, member education, scholarship, member development  
 16 (which deals with issues of decorum within the chapter), finance officer (which oversees the financial  
 17 operations of a budget in excess of \$1 million annually), marketing, and administrative affairs. These  
 18 leadership roles provide young women with experience that will help them become engaged members of  
 19 civic society and effective alumnae representatives of Kappa Alpha Theta.

20           16.    Kappa Alpha Theta at USC has a diverse membership and welcomes strong young  
 21 women from around the country and the world. Kappa Alpha Theta is, however, selective in who is  
 22 admitted to the chapter. For one, Kappa Alpha Theta seeks young women with exceptional character and  
 23 strong academic credentials, and requires that, if admitted, members maintain a minimum grade point  
 24 average in order to stay in good standing. In addition, a typical class of new members to Kappa Alpha  
 25 Theta will vary from year to year. New member class size is limited by a quota set by the National  
 26 Panhellenic Officer for USC. This helps to ensure the greatest number of placements of potential new  
 27 members in chapters at USC. This also helps to ensure that the class size of new members allows for  
 28

1 each sorority to be able to maintain their values of sisterhood and so that they can be sure that each new  
2 member receives the appropriate amount of care, attention, training and support.

3 17. Plaintiff Alpha Upsilon Chapter of Sigma Chi fraternity (hereinafter Sigma Chi) was  
4 founded at USC in 1889, which makes it the oldest fraternity at USC. Sigma Chi's history at USC is  
5 deeply ingrained. Two members of Sigma Chi were responsible for funding, designing and constructing  
6 the Trojan Shrine, more popularly known as "Tommy Trojan." Sigma Chi's USC alumni include John  
7 Wayne, Tom Selleck, Mike Holmgren (Super Bowl winning coach), Buster Crabbe (swimming  
8 Olympian and Hollywood actor) and The Honorable Manuel Real, United States District Court Judge.

9 18. Sigma Chi's fundamental purpose is the "cultivation, maintenance and accomplishment  
10 of the ideals of friendship, justice and learning within its membership [...] by developing, implementing  
11 and monitoring programs that foster leadership, build character and promote positive relationship skills,  
12 which in turn enable its members to become productive and caring participants in their families, colleges  
13 and communities." <http://sigmachi.org/values>.

14 19. Each year Sigma Chi and the Sigma Chi Foundation provide valuable support and  
15 training to undergraduates, at no cost, for the express purpose of building leadership talent among  
16 undergraduates. Sigma Chi offers a week-long leadership development experience for qualified  
17 undergraduate Sigma Chis with at least two years remaining in college, and who wish to improve their  
18 understanding of leadership as it relates to personal development, group dynamics, and intentional  
19 efforts to make positive change in the world.

20 20. A key concern of Sigma Chi is the well-being and growth of undergraduate members and  
21 it maintains a range of resources to that end. The Crossroads program focuses on issues of drug and  
22 alcohol use. <http://www.sigmachicrossroads.com/>. Sigma Chi Lifeline provides current and real time  
23 assistance, counseling and support in a variety of areas of student well-being such as emotional  
24 disorders, depression, suicidal behavior and stress to name just a few. These programs help equip young  
25 men with the tools and values necessary to become productive and caring participants in their families,  
26 colleges and communities.

27 21. Sigma Chi has a zero tolerance policy on hazing and acts forcefully in the rare cases it  
28 occurs. In 2018, Sigma Chi took the lead in the Greek world by adopting a complete ban on possession

1 or use of hard alcohol in all chapter houses and use of any form of alcohol at functions where pledges  
2 are present.

3 22. Plaintiff Gamma Tau Chapter of Beta Theta Pi fraternity (hereinafter Beta) opened its  
4 chapter at USC in 1947. Beta is one of the only fraternities at USC that has retained its original chapter  
5 house since its founding, which is currently undergoing a half-million-dollar remodel. Over the years,  
6 Beta has developed countless business leaders, world-class athletes, and generous philanthropists. The  
7 Gamma Tau Chapter has more collective Olympic medals between its alumni than any other fraternity  
8 chapter in the nation. Among the Beta USC alumni are Edward Roski (real estate developer, part owner  
9 of the Los Angeles Kings and the Los Angeles Lakers, and provider of naming gifts for both the Roski  
10 School of Fine Arts and the Roski Eye Institute at USC); Stan Smith (former No. 1 tennis player, and  
11 winner of the 1968 US Open title and the 1970 Wimbledon title); and Murray Rose (former world-  
12 record holder swimmer, and 4-time Olympic gold medalist).

13 23. Beta's five core values are cultivation of intellect, responsible conduct, mutual assistance,  
14 integrity, and trust. In connection with its recruitment process, Beta seeks to identify those individuals  
15 who best exemplify these five core values.

16 24. Beta maintains an internal judicial board, the KAI Committee, which holds weekly  
17 meetings in order to discuss any issues with members following these five core values, how to better  
18 instill the five core values of its members, and how to enhance these values within chapter culture.  
19 Every semester, its alumni board sponsors undergraduate members' attendance to leadership  
20 conventions hosted by the National fraternity. These conventions (Keystone Leadership Convention and  
21 Wooden Institute) are extremely valuable to the leadership development of our undergraduate members,  
22 and allow members to connect with Betas from universities all around North America. Every Fall, the  
23 chapter raises money to support the Movember Foundation, the largest men's health charity in the  
24 world.

25 25. Plaintiff Alpha Nu Chapter of Theta Xi fraternity (hereinafter Theta Xi) was founded at  
26 USC in 1940. Its national fraternity was founded in 1864 at Rensselaer Polytechnic Institute in Troy,  
27 NY. Alumni from the Theta Xi Chapter at USC include Malcolm Lucas (former California Supreme  
28 Court Chief Justice) and Jack Lindquist (former president of the Disneyland amusement park).

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

26. The purpose of Theta Xi is to provide a college home environment for its active members in which fellowship and alumni guidance lead to wholesome mental, moral, physical, and spiritual growth. To that end, Theta Xi actively supports and augments college and community efforts to make individual members more mature and chapter groups more useful units of society. The members also receive considerable leadership training. Because the chapter is relatively small, members are offered multiple opportunities to serve as an executive board member or as a head of a committee such as social or philanthropy. The positions entail responsibilities—such as managing the chapter’s six-figure budget, maintaining cleanliness of a 10,000 square foot property, and running social activities—that prepare students for their jobs and internships, and instill in them the work ethic and desire for self-improvement that is necessary for their mental and spiritual growth.

27. Plaintiff Beta Sigma Chapter of Tau Kappa Epsilon fraternity (hereinafter TKE) is the largest fraternity at USC and the largest TKE Chapter in the nation. The national TKE alumni include Ronald Reagan, Elvis Presley, Terry Bradshaw and Danny Thomas. TKE’s USC alumni include Marc Benioff (Founder and CEO of Salesforce.com and member of the USC Board of Trustees), Bob Barr (former Congressman and Presidential Candidate), Gerald P. Carr (NASA Astronaut and Commander of Skylab 4), Sim Iness (American Discus Thrower and Olympic Gold Medalist), and Mark Watters (Six-Time Emmy Award Winning Composer).

28. TKE’s mission is to aid young men in their mental, moral, and social development for life and thus shape better men for a better world. TKE was established as an organization where membership is based on personal worth and character rather than wealth, rank, or honor. Since its national founding in 1899, TKE has admitted members regardless of their race or religion. TKE prohibits hazing of any kind and TKE at USC has banned hard alcohol at all functions, events and in the chapter houses.

29. TKE is engaged in significant philanthropic activities. Nationally, and locally, members of TKE have raised millions of dollars in support of St. Jude Children’s Research Hospital. In addition, USC TKE’s have raised more than \$100,000 in support of the Jack Jablonski BEL13VE in Miracles Foundation to advance paralysis recovery. The foundation is inspired by current USC TKE member Jack Jablonski who was injured and paralyzed in a hockey accident in high school. Participation in these



1 activities teaches young men the importance of charitable and philanthropic work, and instills in them a  
2 value system that will encourage them to engage in such work throughout their lives.

3 30. TKE provides valuable leadership and personal development through its annual Charles  
4 R. Walgreen Jr. Leadership Academy in Colorado Springs. The curriculum takes a deeper look at  
5 Scholarship, Character, Leadership, Teamwork, Service and Brotherhood and each attendee is  
6 influenced at a personal level mentally, morally and socially. The Leadership Academy is available to  
7 members at no cost. In addition to the Academy, TKE conducts four Regional Leadership Conferences  
8 annually that focus on chapter development and responsibility.

9 31. TKE at USC is committed to making a profoundly positive impact on the lives of its  
10 members regardless of their financial background. It offers four merit-based scholarships with an  
11 endowment totaling \$168,000, and \$13,750 in need-based scholarships from corporate donors to its  
12 members annually.

13 **A. Plaintiffs' Recruitment Process**

14 32. For decades, incoming first-year students at USC were invited to join sororities and  
15 fraternities, if they chose to do so. This policy is important because it allows the students and the  
16 organizations to find each other during their important first semester in college. Once a student has  
17 joined a sorority or a fraternity, they become part of an important support system, and the sorority or  
18 fraternity the student joins can begin the process of instilling the core values that will allow the student  
19 to become a valued and valuable member of the campus community and society at large. Far from  
20 creating problems for first semester students, joining a sorority or fraternity allows entering students the  
21 ability to bond with other students with similar values and goals. It has also provided these students with  
22 support systems allowing them to acclimate to new campus life.

23 33. Fall rush at USC coincides with football season, which creates substantial opportunities  
24 for incoming students to interact with Plaintiffs and their members. With a typical five or six home  
25 games each season, these games are the source of significant social bonding both within the fraternity  
26 itself but also with relationship to other fraternities and sororities. In addition, USC's campus-wide  
27 "Family Weekend" occurs during the Fall semester when students and parents are invited to attend on-  
28 campus gatherings and interact with current members of sororities and fraternities, along with their

1 alumni. Moreover, homecoming, including class reunions, also occurs during the Fall semester. For  
2 decades, incoming students have taken advantage of these types of events to associate with sororities  
3 and fraternities of their choice and undertake the formation of lifelong friendships.

4 **B. USC Violates Its First Amendment Policy And The Leonard Law By Denying First**  
5 **Amendment Rights To Students Seeking To Join Sororities And Fraternities**

6 34. USC has an official policy regarding students' First Amendment rights. Ex. 2 (This can  
7 also be viewed online at <https://policy.usc.edu/scampus-part-d/>). USC pledges to its students that "in all  
8 cases, the rights of students under the First Amendment to the Constitution, as applied by California law,  
9 will always be protected." *Id.* USC "recognizes the crucial importance of preserving First Amendment  
10 rights," and both students and student organizations shall be entitled to exercise their First Amendment  
11 rights so long as the exercise of those rights "do not disrupt or substantially interfere with the regular  
12 and essential operations and activities of" USC. *Id.* USC expressly recognizes that its students "shall be  
13 free to organize and join campus associations to promote their common interests." Ex. 3 (This can also  
14 be viewed online at <https://policy.usc.edu/scampus-part-a/>).

15 35. The State of California has chosen to extend full free-speech rights to students enrolled at  
16 private universities in California. California has provided those additional free-speech protections  
17 through the "Leonard Law," which is codified at California Education Code § 94367. The Leonard Law  
18 prohibits private universities from disciplining students in ways that would violate the First  
19 Amendment's free-speech component if undertaken off-campus by a governmental entity.

20 36. The United States Constitution has long recognized that the First Amendment's right to  
21 free speech necessarily incorporates a right of freedom of association. *See NAACP v. State of Ala. ex rel.*  
22 *Patterson* (1958) 357 U.S. 449 (Holding that First Amendment includes a freedom of association right  
23 for individuals to join organizations).

24 37. While paying lip-service to "always protecting" students' First Amendment rights, USC  
25 has proposed change to the *status quo* which, if allowed to go into effect for the upcoming school year,  
26 would drastically curtail students and Plaintiffs' First Amendment rights. USC unilaterally announced a  
27 new policy that would prohibit all in-coming first-year students from joining sororities or fraternities.  
28 Ex. 1 (A. Carry 9/29/17 letter) ("effective Fall 2018," students are prohibited from joining a sorority or

1 fraternity until they have “completed a minimum of 12 academic units, and a minimum USC grade point  
 2 average of 2.5”). USC has offered only one purpose supporting this radical change in the decades-old  
 3 recruitment process: the new policy purportedly has “the benefit of allowing new students one semester  
 4 to acclimate to USC academics and social life.” *Id.* But this stated reason does not withstand even  
 5 minimal scrutiny, let alone the strict scrutiny required when students’ First Amendment rights are  
 6 violated.

7 38. For example, while USC claims that new students need “one semester to acclimate to  
 8 USC academics and social life” there is no factual basis for this position. Students in sororities and  
 9 fraternities perform just as well academically, if not better, than the student body population in general.  
 10 Ex. 4 (Fall 2017 GPA statistics for USC student-body population). And although USC was asked to  
 11 provide data demonstrating that first-year students in sororities or fraternities perform worse than those  
 12 first-year students in the general population, it was unable to do so.

13 39. But even if first-year sorority or fraternity members had a lower GPA than other first-  
 14 year students, this is no justification for denying students their Constitutional rights to freely associate.  
 15 Moreover, this justification is illogical. If an organization were to be denied the ability to exercise its  
 16 constitutional rights if the average GPA of their members was below that of the population at large, then  
 17 only half of the student body could exercise their Constitutional rights (unless USC suddenly turned into  
 18 a Lake Woebegon-like institution where everybody was above average). Even more, some students may  
 19 not aim for the same level of academic achievement targeted by the University. Those students are  
 20 entitled to the same protections under the Constitution as all other students.

21 40. USC’s proposed new policy discriminates against students based solely on the group they  
 22 want to join, and in doing so also discriminates against sororities and fraternities. USC proposes no  
 23 restrictions on incoming students from joining any other organization. Thus, incoming students, before  
 24 completing 12 units with a minimum GPA, may join the USC marching band, the football or basketball  
 25 team, the ROTC, the Chicanos/Latinos For Progressive Education club, the College Students for Bernie  
 26 club, the orchestra, various a cappella groups and myriad others. USC does not infringe on the rights of  
 27 students to join any of these groups, and instead has singled out a group of students and organizations  
 28

26  
27  
28  
29

1 USC has placed in a disfavored category. The Constitution does not allow discrimination based on what  
2 group a student would like to join.

3 41. In addition, USC's proposed policy will actually be counter-productive to allowing  
4 students to acclimate to life at USC. USC is a highly-selective university and its incoming student body  
5 are successful, high-achieving young men and women. They are capable of making decisions for  
6 themselves whether to join a sorority or fraternity. In addition, while incoming students do undergo a  
7 transition during their first year, and many students express feelings of loneliness and isolation during  
8 this transition from high school, it makes no sense to *deny* them one potential outlet and support system  
9 for acclimating to this new environment. Sororities and fraternities provide an opportunity for interested  
10 students to connect with an established support system to aid in the social and academic transitions to  
11 university life.

12 **C. USC's Proposed "Deferred Recruitment" Policy Infringes Constitutional Rights and**  
13 **Harms Students and Greek Organizations**

14 42. The constitutional right to freely associate is infringed by USC's proposed policy. "The  
15 loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes  
16 irreparable injury." *Elrod v. Burns* (1976) 427 U.S. 347, 373. Beyond infringing these First Amendment  
17 freedoms, USC's policy also causes injury to the organizations, and their future ability to engage in  
18 protected First Amendment activity.

19 43. USC's proposed new policy is especially injurious to young women who wish to join a  
20 sorority. A young woman's first semester in college is frequently the first time she will live away from  
21 her home and family structure. Many young women might experience feelings of loneliness and  
22 isolation in connection with this transition. Sororities offer these young women a support structure and a  
23 sense of community to aid in this transition. Many young women find the support system provided in a  
24 smaller group setting such as a sorority to be a very valuable antidote to what can seem to be the  
25 overwhelming size of the USC campus at large, where a student body consisting of tens of thousands of  
26 people can cause feelings of loneliness and isolation. Independent research has determined that having  
27 the opportunity to join a sorority during their first semester can help young women cope with these  
28 issues.

1           44. USC's proposed elimination of Fall recruitment for incoming first year students will also  
2 have a deleterious effect on recruitment during the Spring semester. Sororities and fraternities, along  
3 with those students seeking to join the organizations, spend a significant amount of time in getting to  
4 know each other. Traditionally, fraternities and sororities have held recruitment periods in both the Fall  
5 and Spring semesters. But this process becomes unworkable if the Spring semester recruitment process  
6 would also be expected to absorb the number of students who otherwise would have sought to join the  
7 organizations during the Fall. The sororities and fraternities simply do not have sufficient resources to  
8 recruit, train, and mentor twice the number of students in the Spring. In addition, the quality of training  
9 and mentoring that each sorority and fraternity can provide to its members will likely suffer as a result of  
10 not being able to provide as much individual attention as they otherwise could if the pledge class size for  
11 Spring semester was not artificially inflated by USC's deferred recruitment policy. This ultimately could  
12 lead to substantially fewer students being able to join sororities or fraternities of their choice.

13           45. The inevitably increased amount of foot traffic during a combined recruitment in the  
14 Spring will make it significantly more difficult for fraternities to decide to whom to offer bids. It simply  
15 is not feasible for sororities and fraternities to evaluate potential new members in a large volume in such  
16 a short period of time. Many students who otherwise would have joined a sorority or fraternity might  
17 nevertheless be declined a bid during this process because of the limited time and resources available to  
18 the organizations for the recruitment process. These students may further be discouraged from ever  
19 joining a sorority or fraternity because of this lapse of time.

20           46. Eliminating Fall recruitment for incoming students will also negatively impact many of  
21 the expressive association aspects offered by sororities and fraternities. As just one example, plaintiff  
22 Theta Xi has a program whereby it sends new members to "Rising Stars" to its national headquarters in  
23 St. Louis, Missouri. "Rising Stars" is the national organization leadership academy over MLK Day  
24 weekend, at the beginning of the Spring semester. The members sent to this leadership academy receive  
25 invaluable leadership skills and almost always go on to take high-responsibility executive board roles in  
26 the local chapter. As a result of deferred recruitment, a freshman will not be able to attend this event  
27 until a full year after initiation and will have considerably less time remaining in their college years to  
28

1 take the skills they learn at the leadership academy and apply them to the Theta Xi organization to help  
2 improve it.

3 47. USC's proposed policy will likely lead to significant negative financial consequences to  
4 sororities and fraternities. Typically, by the time Spring recruitment is completed, students have already  
5 selected a housing choice with friends they have made in the Fall. These students are then significantly  
6 less likely to live in the sorority or fraternity house during the next school year. The majority of  
7 residents in sorority and fraternity housing are sophomores. If the second semester of freshman year is  
8 the earliest possible time for students to join a sorority or fraternity, this will cause significant decline in  
9 the live-in percentage of sororities and fraternities. Because housing is very competitive at USC, and  
10 students often have to make their housing decisions before winter break to solidify their  
11 accommodations for the following year, many first-year students will have to make these housing  
12 decisions before they would even be allowed to consider whether to join a sorority or fraternity. This  
13 decrease in live-ins will cause devastating rent shortfalls, causing sororities and fraternities to face  
14 significant financial strain. As these organizations face additional financial strain, the ability of students  
15 and these organizations to freely associate with each other will suffer.

16 48. The financial shortfalls that will result from USC's proposed policy will severely restrict  
17 Plaintiffs' ability to engage in the expressive activities described above. If Plaintiffs face significant  
18 financial strain, they will not be able to engage in the full range of philanthropic activity they have in  
19 years past, and could be required to alter or eliminate their charitable programs. These cuts to  
20 philanthropy and charity will limit Plaintiffs' opportunities and abilities to instill in their members the  
21 values necessary to become productive and valuable members of the campus community and society at  
22 large.

23 49. Simply put, deferred recruitment would be devastating toward membership within USC  
24 sororities and fraternities and the transmission of the core values around which sororities and fraternities  
25 are organized. The first semester of college is the period when the vast majority of students who choose  
26 to join sororities and fraternities at USC decide to join. The prime reason why young women and men  
27 decide to join a sorority or fraternity is to find a community that they are proud to call home. When  
28 barred from joining a sorority or fraternity during their first semester, students may feel pressured to join

1 other groups, or forego joining sororities and fraternities altogether. USC has offered no legitimate  
2 reason why other student organizations should be afforded a more favored status on campus than  
3 sororities and fraternities.

4 **D. Substantially Less Restrictive Means Exist To Achieve USC's Goals**

5 50. USC has publicly declared only one reason for its infringement of students' First  
6 Amendment rights: to provide students with time to acclimate to academic and social life on campus.  
7 But this rationale is discriminatory against sororities and fraternities, and those who want to join those  
8 organizations, as no other on-campus organization is subject to a one-semester delay in order to  
9 acclimate to academic and social life on campus.

10 51. USC could achieve its goal through a variety of measures which would be substantially  
11 less restrictive than a blanket denial of students' rights to freely associate. For example, USC can  
12 institute, and in fact has done so, policies regulating misconduct occurring at sororities or fraternities.  
13 USC could then penalize any student or organization found to violate those policies. In addition, USC  
14 could, as it has, institute minimum GPA requirements in order to continue to remain a member of a  
15 sorority or a fraternity. In fact, however, most sororities and fraternities already have their own  
16 minimum GPA requirements which are higher than USC's.

17 52. In fact, in February 2018, plaintiff Sigma Chi proposed to Dr. Ainsley Carry, Vice  
18 President for Student Affairs, a series of less-restrictive means of achieving these goals but USC ignored  
19 these proposals. These proposals included significant concrete proposals to reduce alcohol consumption  
20 and to continue to eliminate hazing, and proposed that severe penalties could be imposed should any  
21 student or organization be found to have violated these restrictions. These proposals suggested ways that  
22 sororities and fraternities could work in partnership with the university and act as leaders for curbing  
23 problems that face all students on campus—excessive alcohol consumption, for example, is a significant  
24 problem in USC owned and operated freshman dormitories—without significantly infringing students  
25 and organizations First Amendment rights. Dr. Carry received this proposal without significant comment  
26 and then never responded to it. This proposal contained valid, reasonable and strong protocols for  
27 achieving USC's stated goals, without infringing students and Plaintiffs' First Amendment rights.  
28

**FIRST CAUSE OF ACTION**

**VIOLATION OF CALIFORNIA'S LEONARD LAW**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

53. USC is subject to the U.S. Constitution and the California Constitution's First Amendment restrictions as set forth in California's Leonard Law, California Education Code Section 94367.

54. Plaintiffs have standing to assert claims for violation of the Leonard Law on their own behalf, and on behalf of their individual members.

55. The First Amendment to the United States Constitution includes a right to freely associate with organizations, such as Plaintiffs here, without interference from USC. Plaintiffs, and their current and future members, are entitled to the protections of the First Amendment to associate freely with those they choose.

56. USC's proposed "deferred recruitment" policy infringes on the First Amendment rights of Plaintiffs and Plaintiffs' current and future members. USC's proposed "deferred recruitment" policy serves no compelling interest unrelated to the Plaintiffs, and their current and future members' First Amendment rights.

57. USC's proposed "deferred recruitment" policy is blatantly discriminatory against Plaintiffs' First Amendment rights, as no other on-campus group is subject to the one-semester waiting period. The policy does not generally apply to the student body as a whole, it applies only to those who seek to exercise their First Amendment rights to associate with a sorority or fraternity.

58. There are significantly less restrictive means to achieve USC's goals, including to punish misconduct, if it occurs.

59. If allowed to be implemented, USC's proposed policy will deprive Plaintiffs and their current and future members of some of their First Amendment freedoms. In contrast, no harm will befall upon USC from preserving the decades-old status quo of Fall semester recruitment and allowing Plaintiffs and their members the freedom to continue to exercise their First Amendment rights.



**PRAYER FOR RELIEF**

1  
2 1. Plaintiffs seek preliminary and permanent injunctive relief to preserve the status quo,  
3 which has existed for decades, and to allow incoming first-year students to join a sorority or fraternity if  
4 they choose during their first semester;

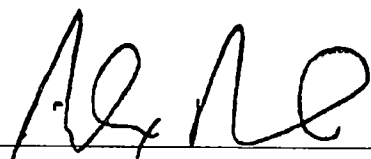
5 2. Plaintiffs further seek a declaration from this court that USC's proposed "deferred  
6 recruitment" policy will infringe Plaintiffs and their members' First Amendment rights;

7 3. For attorneys' fees and costs of suit incurred herein;

8 4. For such further and additional relief as this Court may deem just and proper.  
9


10  
11 DATED: June 22, 2018

KIRKLAND & ELLIS LLP

12  
13 

14  
15 R. Alexander Pilmer, P.C.  
16 Jeffrey S. Sinek  
Michael D. Lieberman (*Pro Hac Vice* to be filed)

17 Attorneys for Plaintiffs  
18 OMICRON CHAPTER OF KAPPA ALPHA  
19 THETA SORORITY; ALPHA UPSILON  
20 CHAPTER, SIGMA CHI FRATERNITY;  
21 GAMMA TAU CHAPTER OF THE BETA  
22 THETA PI FRATERNITY; ALPHA NU  
23 CHAPTER OF THE THETA XI  
24 FRATERNITY; BETA SIGMA CHAPTER  
25 OF THE TAU KAPPA EPSILON  
26 FRATERNITY  
27  
28

BLUEBIRDonline.com (888) 477-0700  ALST

06/22/2018

Exhibit 1



# USC University of Southern California

STUDENT AFFAIRS

September 29, 2017

**RE: GPA REQUIREMENT FOR PARTICIPATION IN GREEK LETTER ORGANIZATIONS**

Dear USC Community,

Greek-letter organizations enhance the student experience at USC by providing spaces for personal connection, brotherhood/sisterhood, academic support, and philanthropic engagement. Fraternities and sororities are an integral part of the campus community and can have a positive impact for members and non-members. These organizations have been an instrumental part of the USC experience dating back to 1889. Since then, the Greek community and the university have been bounded by shared goals. We believe it is important for us to have a healthy and thriving Greek community as part of our student-life experience.

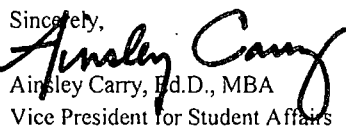
This summer, the University continued reviewing the most effective ways to support students in their first year of enrollment. This is the toughest year of the transition to college life as students experience the most social and academic challenges. A number of our peer institutions have implemented policies that support first-year students by allowing them time to acclimate to the university's academic and social climate before participating in Greek-letter organizations.

Several weeks ago, I began conversations with leaders of all USC Greek councils, individual council presidents, the Undergraduate Student Government, and representatives from the national office to evaluate issues and concerns related to modifying requirements for joining Greek-letter organizations. I sought to understand the implications of moving toward a later recruitment. I read dozens of emails from parents, alumnae, and students. I also read the Interfraternity Council and Panhellenic Council's thoughtful position statements on the topic. I heard from voices on both sides of the discussion. I appreciated the considerate manner in which student leaders presented their concerns, particularly in light of how deeply personal this issue is to many. I want to thank everyone who took time to express their thoughts.

In weighing these considerations, the University has concluded that the benefit of allowing new students one semester to acclimate to USC academics and social life far outweigh the benefits of not making this policy change. Therefore, *effective Fall 2018, all USC students who wish to participate in Greek organization recruitment must have completed a minimum of 12 academic units, and a minimum USC grade point average of 2.5.*

Specifics remain on how to implement this policy change. Therefore, I have asked Associate Vice Provost for Student Affairs, Dr. Monique Sosa Allard, to chair a task force composed of representatives from Greek Council leadership, Undergraduate Student Government, Residential Student Government, and the Office of Fraternity and Sorority Leadership to evaluate concerns and propose remedies. The task force will begin meeting in early October.

We continue to value our Greek organizations and their role in our campus community and we look forward to working together.

Sincerely,  
  
Ainsley Carry, Ed.D., MBA  
Vice President for Student Affairs

University of Southern California  
Student Union 201, Los Angeles, California 90089-4891 • Tel: 213 740 5240 • Fax: 213 821 1244

6612272019

ALST  
BLUEBIRDonline.com (888) 477-0700

09/22/2018

Exhibit 2

# Policy

search

---

## POLICY UPDATES

Submit or revise a policy  
New and revised policies

---

## RELATED WEBSITES

Employee Gateway

August 21, 2017

# SCampus Part D

## FREE EXPRESSION AND DISSENT

### Section 1 – Policy

The University of Southern California is committed to fostering a learning environment where free inquiry and expression are encouraged and celebrated and for which all its members share responsibility. Dissent (defined as disagreement, a difference of opinion, or thinking differently from others) is an integral aspect of expression in higher education, whether it manifests itself in a new and differing theory in quantum mechanics, a personal disagreement with a current foreign policy, opposition to a position taken by the university itself, or by some other means.

The university is a diverse community based on free exchange of ideas and devoted to the use of reason and thought in the resolution of differences. Whether in free debate or in the exchange of information, this community must rely on self-restraint and self-discipline if it is to retain its freedom to search and question. However, when self-restraint and self-discipline fail, the university will initiate such action as necessary to prevent disruption of or substantial interference with its community and to preserve the rights of its individual members.

The university's position is set forth in the following statement on Student Rights and Responsibilities:

"Students and student organizations shall be free to examine and discuss all questions of interest to them and to express opinion publicly and privately. They shall be free to support causes by all orderly means, which do not disrupt or

05/22/2018

substantially interfere with the regular and essential operations and activities of the university, since such disruption or substantial interference violates the responsible exercise of free inquiry and expression. Students and organizations shall make it clear to the academic and larger communities that in their public expression they speak only for themselves."

If any student member of the university community believes that the university has acted in an arbitrary, capricious or discriminatory manner in exercising the Policy on Free Expression and Dissent (or its related policies), they may submit a formal grievance as outlined in the Student Grievance Procedures.

## Section 2 – Reasonable Time, Place, and Manner

In exercising its responsibility to provide and maintain an atmosphere of free inquiry and expression, the university may establish reasonable time, place and manner restrictions for the purpose of avoiding disruption to or substantial interference with its regular and essential operations and activities. The university will not base decisions regarding time, place and manner upon the content of the message, except as permitted in those narrow areas of expression devoid of federal or state constitutional protection.

The university recognizes the crucial importance of preserving First Amendment rights and maintaining open communication and dialogue in the process of identifying and resolving problems which arise in the dynamics of life in a university community. The legitimate expression of differing opinions and concerns, including unpopular, controversial or dissident viewpoints, is an essential element of the academic process; the imposition of these opinions and concerns upon those who in turn dissent from them is not to be condoned and is inconsistent with a university's process and function.

Lawful and peaceful demonstration as an expression of favor or dissent will be permitted and protected. On the other hand, the university will not tolerate coercive disruption, defined generally herein as activity that imposes the will of other persons or groups within the university community, outside of the established university procedures and policies for the expression of opinion and the resolution of differences. Coercive disruption is construed to include any activity which, contrary to law, denies the rights of other students, the faculty or the staff of the university and:

- I. Disrupts or obstructs educational or other activities of the university.
- II. Reacts to the expression of the peaceful dissent of others by attempting to deny their rights.
- III. Obstructs or restricts free movement of persons on any part of the university campus, including the free entry to or exit from university facilities.
- IV. Denies or interferes with the standard operations, or use, of offices or other facilities to the students, faculty, officers, staff or guests of the university.
- V. Threatens or endangers the safety of any person on the university campus. This includes but is not limited to signs on any forms of stakes.
- VI. Results in damage to or destruction of property.
- VII. Contains "fighting words" where (a) the speech, considered objectively, is abusive and insulting rather than a communication of ideas and (b) it is actually used in an abusive manner in a situation that presents an actual danger.
- VIII. Constitutes "hate violence," meaning any act of physical intimidation or physical harassment, physical force or physical violence, or the threat of physical force or physical violence, that is directed against any person or group, or the property of any person or group because of the ethnicity, race, national origin, religion, sex, sexual orientation, disability, or political or religious beliefs of that person or group. (Acts shall not be considered "hate violence" based on speech alone, except upon a showing that the speech itself threatens violence against a specific person or group, that the person or group against whom the threat is directed reasonably fears that the violence will be committed because of the speech, and that the person threatening violence had the apparent ability to carry out the threat.)
- IX. Makes sustained or repeated noise in a manner which substantially interferes with a speaker's ability to communicate their message or the rights of others to listen. Since a clear differentiation between lawful or peaceful dissent and coercive disruption may often be difficult, the foregoing list is illustrative and not exhaustive; this list is expected to evolve, based on experience and changes in the law. It should be understood that the application of this policy also takes situational factors into consideration. For example, conduct appropriate at a political rally might constitute a violation of this policy if it occurred within a classroom.

In all cases, the rights of students under the First Amendment to the Constitution, as applied by California law, will always be protected.

06/22/2018

Any coercive disruption initiated by a visitor or a student member of the university community or occurring during any university-sanctioned activity or function may be met by the action of the university that is necessary to restore the order and communication required for the rational solution of problems and free debate. In addition, any coercive disruption by students may be subject to disciplinary action through the Office of Student Judicial Affairs and Community Standards up to and including suspension or expulsion and/or legal action through local, state or federal courts.

If any member of the university community believes that disruption of or substantial interference with the regular and essential operations and activities of the university is occurring or that this policy is otherwise being violated, the established procedure is to inform university Public Safety officers and/or university administrators. It is the responsibility of designated university officials to protect the university community to the fullest extent possible.

### Section 3 – Guidelines for Campus Demonstrations

All student members of the university community have the right to hold a demonstration (including, but not limited to, a rally, gathering, protest, parade or procession) on campus. Any property damages related to the demonstration may result in the assessment of fees associated with cleaning or repair costs to either the organization or the individuals.

Reservations and prior arrangements are recommended for campus demonstrations. If students do not make advance reservations, their event may be moved or rescheduled in order to accommodate previously scheduled reservations, in accordance with the university's right to establish reasonable time, place, and manner for campus events.

All demonstrations are encouraged to follow these guidelines, which serve as a mechanism to ensure a successful and safe demonstration:

- I. Reservations for outdoor spaces or other venues to conduct campus demonstrations are encouraged and should be made through Trojan Event Services online at trojanevents.usc.edu. These spaces are made available to the campus community on a first-come, first-served basis. Students may also reserve space to protest approved speakers, presenters or programs as long as those protests are consistent with the guidelines stated in the Reasonable Time, Place and Manner section of this policy.
- II. Representatives of the sponsoring organization wishing to stage a demonstration are encouraged to complete an Outdoor Event Questionnaire and a USC Event Permit Application at least two weeks prior to the demonstration. The Trojan Event Services staff will check on the availability of the venue requested and can facilitate communication with Safety and Risk Management, Operations and Maintenance, Public Safety and Student Affairs, as needed.
- III. Representatives of the organization sponsoring a demonstration are encouraged to attend a meeting with the Director of Campus Activities or other Student Affairs staff so that expectations, rights and responsibilities are mutually understood. The sponsoring organization is responsible for the behavior of the organization's members and of guests from off campus. Informing these members and guests of the university's expectations is the responsibility of the sponsoring organization's representatives. The sponsoring organization's representatives should also explain to the organization's members and guests the individual and organizational implications for failure to adhere to these expectations.
- IV. When a campus demonstration is scheduled, organizers can expect the university personnel present (typically staff from the Division of Student Affairs) to help ensure that organizers' rights are protected and the university's regular and essential operations and activities continue. Such regular and essential operations and activities include, but are not limited to, classes, meetings, and the standard operation of university offices and facilities. As the university is concerned about the entire university community and visitors, particular attention will be spent on managing crowds, maintaining access to buildings, sidewalks, streets, etc. and personal safety for all.

### Section 4 – Advertising, Promotion and Literature Distribution

#### I. Advertising

The Division of Student Affairs oversees all advertising, promotions, literature and publications distribution on the USC campus in order to: The Division of Student Affairs oversees all advertising, promotions, literature and publications distribution on the USC campus in order to:

- a. Protect the rights enumerated in the policy on Free Expression and Dissent.
- b. Help foster and maintain a campus atmosphere of personal responsibility and mutual respect.

06/22/2018

- c. Allow for maximum promotion of student events.
- d. Ensure a safe environment of order and cleanliness on campus.

This will aid in creating a campus that promotes the well-being of its students, faculty, staff and visitors and will provide events with effective publicity and exposure.

## II. General Regulations

a. Content of all printed materials posted or distributed on campus must:

- i. Contain no material containing advocacy directed to inciting or producing imminent lawless action
- ii. Contain no advertisements for "term paper mills" or other products or services which undermine the academic integrity of the university.
- iii. Contain no true threats or intimidation, meaning language where:
  - The speaker means to communicate a serious expression of an intent to commit an act of unlawful violence to a particular individual or group of individuals, or
  - The speaker directs a threat to a person or group of persons with the intent of placing the victim in fear of bodily harm or death.

iv. Contain no advertisements or promotions for alcoholic beverages, illegal drugs or drug paraphernalia.

v. Contain no "fighting words", meaning language where:

- The speech, considered objectively, is abusive and insulting rather than a communication of ideas.
- The speech is used in an abusive manner in a situation that presents an actual danger that it will cause a breach of peace.

b. USC does not exercise prior restraint on printed materials to be posted or distributed on campus that may be libelous or slanderous. However, if such materials are posted or distributed, they may be referred to the Office of Student Judicial Affairs and Community Standards for action.

c. Any material that is not written in English requires a translation to be kept on file with Trojan Event Services in Ronald Tutor Campus Center 425.

d. Any student groups or organizations not recognized by the university will be considered either "commercial" or "personal," including non-profit organizations.

## III. Publicity

All advertising and communication plans/timelines must be submitted in advance to the approving departments. No advertising is permitted until all approvals, paperwork and final payments have been received.

The use of third party promoters is strictly prohibited.

All printed publicity such as flyers, posters and postcards, must include the following entry guideline in accordance with the level of event identified

- a. The full name of the sponsoring organization
- b. The time, date and place of the event
- c. Any entrance fees or costs to participate

6/22/2018



d. Entry guidelines

Level 1 Open to USC student members of the student organization only, with valid USC ID

Level 2 Open to any USC student with valid USC ID

Level 3 Open to USC students, with valid USC ID, and guest

Level 4 Open to USC students, guest(s) and other college student(s). Valid USC ID or other valid college photo ID and proof of 18 years or older required.

Posting

Posting on bulletin boards not controlled by the Division must be approved by the staff of the principal department in that building. It is the university's intent to limit the use of departmental bulletin boards to information relating to that department, unless otherwise posted. Posting on bulletin boards not controlled by the Division must be approved by the staff of the principal department in that building. It is the university's intent to limit the use of departmental bulletin boards to information relating to that department, unless otherwise posted.

In order to advance the university's objectives, to control the number of posters or flyers posted, and to ensure appropriate use of university facilities and property, limits may be placed on the number of posting locations that commercial or personal groups may use.

The individual or organization responsible for the posting must be identified.

Posting or flyer distribution is prohibited in the following areas or in the following ways:

- a. all trees and hedges
- b. the ground, taped or loose
- c. buildings (including glass windows, doors, walls and columns)
- d. Tommy Trojan and all other statues
- e. trash cans
- f. all lamp posts
- g. telephone booths/telephone poles
- h. parking lots and structures
- i. on top of other previously posted materials
- j. fountains
- k. chalking
- l. electronic flyers or materials distributed via USC listservs
- m. on cars, bicycles or other individual property
- n. freestanding advertisements such as signs on stands, sandwich boards, other displays, etc.

The individual or organization responsible for posting will be held accountable for any violations and associated fees.

## Section 5 – Literature and Publications Distribution

### I. General Regulations

- a. This policy applies to students and recognized student organizations and establishes time, place and manner regulations. It will be interpreted and applied so as to respect all federal and state constitutional and statutory rights. (Off-campus organizations, individuals or vendors should consult the policy on Solicitations by Off-Campus Persons, and section IX Vendors in the policy on Sales and Fund-raising.)
- ja. This policy applies to students and recognized student organizations and establishes time, place and manner regulations. It will be interpreted and applied so as to respect all

6/22/2018 11:22:21 AM

federal and state constitutional and statutory rights. (Off-campus organizations, individuals or vendors should consult the policy on Solicitations by Off-Campus Persons, and section IX Vendors in the policy on Sales and Fund-raising.)

b. The Division of Student Affairs oversees the in-person distribution of literature (including posters, handbills and pamphlets) and publications on the campus and the compliance of individuals and organizations with this policy.

c. All university students and recognized organizations may distribute literature anywhere on campus provided such distribution does not affect the scheduled activities in that area and does not interfere with the essential operations of the university.

d. Designated bins are for official university publications only

e. No preprinted manually inserted sheets of information (flyers, advertisements or any other information message sheets) are allowed inside the pages of any official university publication.

## II. Violations

a. Non-compliance with any of the provisions of these guidelines will constitute a violation. a. Non-compliance with any of the provisions of these guidelines will constitute a violation.

b. All printed materials in violation of these policies will be removed. Costs incurred for the removal of such materials can be charged to the person, persons or department responsible for the violation.

c. Any violation or continued violations of these guidelines will be handled in accordance with the severity of the infraction, and will include one or more of the following responses:

- Written warnings
- Assessments for damage to facilities and/or assessed a \$1 per flyer violation fee or the cost for removal
- Denial of future posting and other privileges, including the ability to schedule on-campus facilities for events and/or assessed a \$1 per flyer violation fee
- Appropriate on-campus judicial proceedings through the Office of Student Judicial Affairs and Community Standards
- Appropriate legal action in local, state or federal courts of competent jurisdiction

## III. Responsibility for Content

An individual or organization shall be personally responsible for the content of any sign, notice, poster or other material referenced herein, which the individual or organization sponsors or posts on campus.

Advertisements or promotions on campus or in university publications and activity programs do not imply official endorsement by the university.

## IV. Helpful Hints

a. In the interest of a free exchange of ideas, we recommend that an individual or organization comply with a request from any and all members of the university community for a copy of the material being distributed.

b. Whenever literature is distributed by more than five individuals in any campus area at the same time, we recommend an Event Request process that ensures prior notification to area occupants regarding the activity, works to alleviate misunderstandings, lessens the chance for actions against individuals or organizations distributing literature, allows separation from other groups wanting to distribute literature, and works to alleviate impediments to the flow of traffic across campus or into entrances or out of exits of campus buildings. If more than five individuals will be distributing literature in the same campus area at the same time, we recommend that a representative complete an Event Request

06/22/2018

form and obtain event confirmation., and that a representative be present with a copy of Trojan Event Services confirmed Event Request Form, Confirmations are granted on a first-come, first-served basis.

(This paragraph does not apply to normal academic activities within the program of any school of the university.)

- c. If any literature contains language other than English, in the interest of a free exchange of ideas we request that a copy of the translated information be on file with Trojan Event Services.
- d. Make an effort to print quality flyers and/or literature.
- e. Plan for six weeks or more of lead-time to take full advantage of the process of scheduling and advertising an event.
- f. Plan carefully before printing materials in order to avoid printing more than can legitimately be utilized.
- g. Use other types of promotion in addition to flyers. Flyers should only be one small part of your promotional campaign.
- h. For additional ideas regarding effective promotion of your student organization's events, consult with Campus Activities staff members in the Ronald Tutor Campus Center.

## Section 6 – Solicitations by Off-Campus Persons

### I. General Regulations

This policy is issued to establish time, place and manner regulations for solicitors who substantially interfere with the regular and essential educational and other activities of the university.

Off-campus persons must have written permission from Trojan Event Services to conduct solicitation anywhere on campus.

- a. "Off-campus persons" are defined to include all those who are not USC students, recognized student organizations, staff or faculty.
- b. "Solicitation" is defined to include advertising, taking orders, sales not governed by another policy, distributing literature, distributing material including samples, asking for donations, campaigning (political or otherwise), collecting signatures, collecting email addresses or personal information. The university will apply this policy with full respect for all relevant constitutional and statutory rights.
- c. Vendor sales of products on campus are governed by a more restrictive policy. See Section G.7.IX. Vendors in the Sales and Fund-raising policy.
- d. In exercising its responsibility to provide and maintain an atmosphere of free inquiry and expression, the university may establish reasonable time, place and manner restrictions for the purpose of avoiding disruption to or substantial interference with its regular and essential operations and activities. For all expression with federal or state constitutional protection, the university will not base decisions regarding time, place and manner upon the content of the message. Also see the policy on Reasonable Time, Place and Manner.

### II: Considerations in Issuing Permits

- a. Trojan Event Services will consider other demands on space and will not issue a permit if the space is otherwise programmed.
- b. The activity will be limited to certain designated areas.
- c. The only area currently available for soliciting by off-campus persons is the plaza at the north end of Trousdale Parkway.
- d. The applicant must provide identification.
- e. The application must state the number of participants. Excessive numbers of participants will not be approved to ensure no interference with the free passage of pedestrians.
- f. Each participant will be issued an individual permit.
- g. Permits are for one day at a time.

6/22/2018 11:02:11 AM

h. Decisions on permits will not be based upon the content of the message.

### III. Displaying Permits

All off-campus persons who are participating in solicitation approved by Trojan Event Services must keep their written permission prominently displayed with them at all times on campus.

### IV. Code of Conduct

It is important to foster and maintain a campus atmosphere of mutual respect. Aggressive solicitation is prohibited, including:

- a. Obstructing or restricting free movement of persons on any part of the campus including free passage and the free entry to or exit from classrooms, offices or facilities.
- b. Persisting in closely following or approaching a person, after the person solicited has informed the solicitor by words or conduct that such person does not want to be solicited.
- c. Intentionally touching or causing physical contact with another person without that person's consent in the course of soliciting.
- d. Disrupting, obstructing or substantially interfering with the educational or other operations and activities of the university, including by making sustained or repeated noise.
- e. Using violent or threatening gestures toward a person solicited either before, during or after soliciting; using profane or abusive language which is inherently likely to provoke an immediate violent reaction, either before, during or after solicitation; uttering "fighting words" where the speech, considered objectively, is abusive and insulting rather than a communication of ideas and it is used in an abusive manner in a situation that presents an actual danger.
- f. Physically intimidating or physically harassing, or using physical force or physical violence, or threatening physical force or physical violence.
- g. Endangering the safety of any person on the university campus.
- h. Damaging or destroying property.
- i. Soliciting for immediate receipt of funds.
- j. Remaining on campus at times when only USC persons and invited visitors may enter.

### V. Sanctions

Students and others may register complaints about the activities of off-campus solicitors with the Division of Student Affairs.

Failure to obtain and display a permit, violation of the code of conduct, or violation of the conditions of a permit may result in cancellation of a permit, requirement to leave and not return, and denial of permits in the future. Violations of criminal law may result in arrest.

## Section 7 – Student Organization Logos Policy

- a. All recognized student organizations are permitted to create and use their own logos providing the logos do not violate the USC Graphic Identity Program or alter existing university logos. Student organizations are not allowed to use academic unit or department logotypes without permission from the academic unit or department. Student organizations are also not allowed to use the following university marks without special permission from the Department of Athletics or the Trojan Marching Band: Interlocking SC, Baseball Interlocking SC, Football Helmet Trojan Head and the Trojan Marching Band's logo. For more information, visit [identity.usc.edu](http://identity.usc.edu).
- b. Student organizations are permitted to identify their affiliation with the university through the proper use of USC official logos and trademarks on all products, publications, flyers and documents. Student organizations are required to use authorized licensed vendors when sourcing products that feature any of USC's trademarks or wordmarks. For more information, visit [trademarks.usc.edu/campus-community](http://trademarks.usc.edu/campus-community).

06/22/2018

c. Student organizations may use their own logos in the context of a website that meets the established USC Web publishing guidelines found at [itservices.usc.edu/web/](http://itservices.usc.edu/web/).

d. Requests for permission to use any university logo or mark must be initiated by a student from the requesting organization. Requests from a national organization or other non-USC entity affiliated with the student organization will not be granted.

e. Student organizations must adhere to the General Regulations section of the Advertising, Promotion and Literature Distribution Policies, which state that content of printed materials posted or distributed on campus must:

i. Contain no material containing advocacy directed to inciting or producing imminent lawless action.

ii. Contain no advertisements for "Term Paper Mills" or other services which undermine the academic integrity of the university.

iii. Contain no true threats or intimidation, meaning language where (i) the speaker means to communicate a serious expression of an intent to commit an act of unlawful violence to a particular individual or group of individuals, or (ii) the speaker directs a threat to a person or group of persons with the intent of placing the victim in fear of bodily harm or death.

iv. Contain no advertisements for alcoholic beverages, illegal drugs or drug paraphernalia.

v. Contain no "fighting words", meaning language where (i) the speech, considered objectively, is abusive and insulting rather than a communication of ideas and (ii) is actually used in an abusive manner in a situation that presents an actual danger that it will cause a breach of peace.

USC Employee Engagement and Communications oversees this website as well as university policy development and communication.

✉ [scpolicy@usc.edu](mailto:scpolicy@usc.edu)

Website by USC Web Services

06/22/2018

BLUESBIRDonline.com (888) 477-0700

05/22/2018

Exhibit 3

# Policy

search

---

## POLICY UPDATES

Submit or revise a policy  
New and revised policies

---

## RELATED WEBSITES

Employee Gateway

August 21, 2017

# SCampus Part A

## GENERAL POLICY STATEMENTS

### Section 1 – University Governance

As a private corporation, USC is governed by a Board of Trustees. The Board is a self-perpetuating body, electing one-fifth of its members each year for a five-year term of office. The trustees delegate certain powers to the administration of the university and serve as the ultimate decision-making body.

The President is the chief executive officer of USC. The President carries out policies established by the trustees and, in doing so, has the power to delegate this authority to the officers of the university.

The Academic Senate, Undergraduate Student Government, Graduate Student Government and the Staff Assembly serve as consultative bodies for the President and the administration, preparing studies and reports and making recommendations directly to the president on matters pertinent to the functioning of the university.

Students, faculty, staff and administrators serve on university committees, which provide advice and counsel to the President and administration on a broad variety of matters related to the operation of the university.

Nominations for membership are made usually during the spring semester. Appointments are made by the President of the university. Information and applications for committee membership are available in the Undergraduate Student

6/22/2018 10:21:18 AM

Government office, Ronald Tutor Campus Center 224, (213) 740-5620, or the Graduate Student Government office, Ronald Tutor Campus Center 224, (213) 740-5649.

Departmental and divisional committees and councils exist in many academic units. Information is available through each particular office. In addition, many of the non-academic offices on campus, such as the Engemann Student Health Center, have organized student advisory boards to voice opinions and participate in program development. The appropriate office or department should be contacted for this information.

## Section 2 – Power of the Board

WHEREAS, the University of Southern California, like other independent and private universities, is financed primarily by charitable contributions and grants as well as by tuition, fees and contracts; and

WHEREAS, as a private institution, the university admits students selectively and students who elect this university recognize that their admission and continuance is in the nature of a privilege and not a right; and

WHEREAS, the powers of this corporation are exercised, its property controlled and its affairs conducted by this Board of Trustees, pursuant to the laws of the State of California, the Articles of Incorporation of the University and the by-laws of the university;

NOW, THEREFORE, BE IT RESOLVED, that the Board of Trustees, acting through its officers, has both the right and responsibility to and hereby does affirm its final authority over the on-going institution, and nothing in the Statement of Student Rights and Responsibilities or any other policy pertaining to any subject promulgated by this board shall be construed as in any way abridging the basic powers, rights and responsibilities of this board.

## Section 3 – Statement of Student Rights and Responsibilities

### Preamble

Students, faculty and administrative officials at the University of Southern California, as members of the academic community, fulfill a purpose and a responsibility. The purpose is the humane and critical examination of major issues of social, political, economic, ethical and aesthetic importance which have in the past confronted, and which will in the coming years constantly confront, the society as a whole.

The responsibility is to understand the spectrum of viewpoints on an issue, and, equally, to be actively involved in the solution of the problems these issues delineate.

The university must, therefore, provide an optimal learning environment, and all members of the university community have a responsibility to provide and maintain an atmosphere of free inquiry and expression. The relationship of the individual to this community involves these principles:

1. The fundamental human rights of others;
2. The rights of others based upon the nature of the educational process;
3. The rights of the institution.

Each member of the campus has the right to organize and maintain their own personal life and behavior, so long as it does not violate the law or agreements voluntarily entered into and does not interfere with the rights of others or the educational process.

Each member has the right to identify themselves as a member of the campus but has a concurrent obligation not to speak or act on behalf of the institution without authorization. Every member of the academic community shall enjoy the rights of free speech, peaceful assembly and the right of petition.

### I. Relationship to the Institution

#### a. Non-Discrimination

6612212018



See Section A.4. Equal Opportunity

**b. Student Participation in the University Government**

As members of the academic community, students are free, individually and collectively, to express their views on issues of university policy and on matters of interest to the student body. The student body shall have clearly defined means to participate in the formation and application of university policy affecting academic and student affairs. The actions of the student government within the areas of its jurisdiction shall be reviewed only through orderly, prescribed procedures. Students shall maintain professional standards of discretion concerning information gained about other students and members of the academic community in the course of active participation in university affairs.

**c. Student Right To Be Informed**

All students shall have the right of free access to statements of policy which affect the student body. The university shall have the corresponding responsibility to publish or in other ways make known, those policies which vitally affect students.

**d. Financial Matters**

The student has a right to a full statement of tuition and fees for which he or she is liable and to be informed, as extensively as possible, how such monies are spent. Fees which students, through the student government, impose on themselves, shall be allocated by students within governmental and university policies and regulations.

**e. Political Activity**

Students have the same rights as any individual to engage in political activity either individually or in groups. However, the university will not permit its name or emblems to be used by any person in connection with a campaign, or its campus, facilities or equipment to be used for campaign activities. Nothing in this policy statement is intended to prohibit candidates or others from making public addresses on campus pursuant to campus policies and procedures or the traditional activities of recognized campus organizations.

**f. Utilization of Campus Facilities**

The university has the responsibility to provide students the use of campus facilities according to campus regulations. The university reserves the right to prohibit individuals and groups who are not members of the campus from using its name, finances, or physical and operating facilities for commercial activities. (See Section G.4 Facilities.)

**g. Authorized Search of University Premises**

In university-controlled housing and offices, the university reserves the right to have its authorized agents or employees enter the premises to make necessary inspection for services, maintenance and repairs. Authorized agents or employees may enter the premises any time for the security of resident(s) or for other emergency reasons.

**II. Student/Faculty Relations**

Because the university is essentially an academic community in which students and faculty are co-participants, both must conduct themselves in a manner conducive to the welfare of such a community and to the free interchange of information and ideas without which that community cannot exist. The nourishment of that sense of community bestows certain rights and responsibilities upon the members of that community.

(The latest editions of the *USC Catalogue*, catalogue.usc.edu, *Schedule of Classes* classes.usc.edu, and the *Faculty Handbook*, policy.usc.edu/faculty, contain many current academic policies and procedures.)

**a. Rights**

i. *Protection of Freedom of Expression* Students shall be free to take reasoned exception to the data or view offered in any course of study and to reserve judgment about matters of opinion.

ii. *The Importance of Teaching* Teaching plays a primary role in the advancement of learning. Therefore, students have a legitimate concern about the nature and quality of instruction, and their evaluation of teaching shall be a criterion considered in faculty promotion and tenure. Students should know that faculty are required to meet with their classes as part of their academic responsibility (see Faculty Handbook, policy.usc.edu/faculty/). Freedom to teach and to learn implies that faculty members have the right to determine the specific content of their courses, within the established course definitions, and the responsibility not to depart significantly from their areas of competence or to divert significant time to material extraneous to the subject matter of their courses.

06/22/2018

iii. *Protection Against Improper Evaluation* Students shall have protection through orderly procedures against prejudiced or capricious academic evaluation. The method of grading by professors shall be made known to students. Students can expect that faculty will be willing to explain and discuss any grade, and students have the right to appeal any grade. (See Section C.2. Disputed Academic Evaluation Procedures, and the Faculty Handbook online at [policy.usc.edu/faculty/](http://policy.usc.edu/faculty/) )

iv. *Protection Against Improper Disclosure* Information about students' views, beliefs, political associations, performance and character, which professors and administrators acquire in the course of their work as instructors, advisers and counselors shall be held in confidence.

v. *Assurance of Accessibility* Because the interchange of ideas between student and professor is of the utmost importance, and because such interchanges are often most productive informally, the university shall provide for student access to members of the faculty in appropriate settings outside the classroom.

**b. Responsibilities**

i. *Freedom of Expression* As students are free to take reasoned exception to the data or views offered in any course of study, so students are expected to respect the intellectual views of faculty and the reasoned process of academic debate.

ii. *The Importance of Teaching* As faculty are required to meet with their classes, students are expected to attend classes and to observe courtesy toward their instructors and their fellow students.

iii. *Standard of Performance* Students share responsibility for maintaining standards of academic performance and classroom conduct conducive to the learning process. It is the responsibility of the student to uphold the academic integrity of the university. Cheating on examinations, plagiarism, improper acknowledgment of sources in essays, and the use of a single essay in more than one course are considered very serious offenses and shall be grounds for disciplinary action. (See Part B. University Student Conduct Code)

iv. *Student Participation in Faculty Evaluation* In faculty evaluation, students have the responsibility to perform such evaluation according to academic criteria and not on the basis of opinions or conduct in matters unrelated to academic performance.

**III. Student Affairs**

As members of the academic community, students bring to the campus a variety of interests. They shall be free to organize and join campus associations to promote their common interests.

**a. Freedom of Inquiry and Expression**

i. Students and student organizations shall be free to examine and discuss all questions of interest to them and to express opinions publicly and privately. They shall be free to support causes by all orderly means, which do not disrupt or substantially interfere with the regular and essential operations and activities of the university, since such disruption or substantial interference violates the responsible exercise of free inquiry and expression. Students and organizations shall make it clear to the academic and larger communities that in their public expressions they speak only for themselves.

ii. Students believing that their right to freedom of inquiry and expression has been abridged may present the issue to the Office of the Vice President for Student Affairs. (See Part D. Free Expression and Dissent.)

iii. The distribution of literature is an integral part of expression and of support for a cause. Rules governing such distribution shall ensure the maximum degree of freedom, which is consistent with the regular and orderly operations of the university and the rights of students. (See Section D.5 Literature and Publications Distribution.)

**b. Student Participation in Student Governments**

The Undergraduate Student Government and the Graduate Student Government are the official representative student governments of the University of Southern California with power to make studies, reports and recommendations to the President of the university in any and all matters pertaining to the well-being of the student body. The role of the student government within the areas of its jurisdiction shall be reviewed by the university administration only through orderly procedures and channels.

**c. Student Publications**

The university shall provide editorial freedom for student publications to maintain their integrity as vehicles for free inquiry and free expression in the academic community. The editorial freedom of student editors and managers entails a responsibility to abide by the canons of responsible journalism. Libel, indecency, undocumented allegations, attacks on

6/22/2018 10:00 AM

personal integrity and the techniques of harassment and innuendo shall be considered violation of those canons. As safeguards for the editorial freedom of student publications, the following provisions are guaranteed:

- i. The student press shall be free of censorship and advance copy approval, and its editors and managers shall be free to develop their own editorial policies and patterns of news coverage.
- ii. All university-published and/or -financed student publications shall state explicitly on the editorial page that the opinions expressed are not those of the university or its student body as a whole.
- iii. Editors and managers of student publications shall be protected from arbitrary suspension and removal because of student, faculty, administrative or public disapproval of editorial policy or content. Only for proper and stated causes can editors be subject to removal, and then by orderly and prescribed procedures.

**d. Freedom of Association**

- i. The university has the right to recognize student organizations and to withdraw recognition for failure to abide by campus regulations and federal, state and municipal laws and regulations.
- ii. Student organizations shall be allowed to invite and to hear any person of their choosing in accordance with recognized university speaker procedures, required by the university before the guest speaker is invited to appear on campus. Such procedures shall be designed only to ensure that there is orderly scheduling of facilities and adequate preparation for the event. Control of campus facilities shall not be used as a device of censorship. Sponsoring organizations shall make clear to the academic and larger communities that sponsorship of guest speakers does not imply approval or endorsement of the views presented, either by the sponsoring group or the university.
- iii. The membership, policies and action of a student organization shall generally be determined by a vote of only those persons who are bona fide members of the university community and of that organization.
- iv. Affiliation with an extramural organization shall not of itself disqualify a student organization from university recognition.
- v. When student organizations are encouraged to have advisers, or when campus advisers are required, each organization shall be free to choose its own adviser. Institutional recognition shall not be withheld or withdrawn solely because of the inability of a student organization to obtain an adviser. Campus advisers may advise organizations in carrying out their responsibilities, but they shall not have the authority to control the policies or finances of such organizations.
- vi. Student organizations, including those affiliated with an extramural organization, shall be open to all students without respect to race, color, national origin, ancestry, religion (except for those religious qualifications which may be specified by organizations whose aims are primarily sectarian), sex, gender, gender identity, gender expression, sexual orientation, age, physical disability, medical condition, mental disability, marital status, pregnancy, veteran status, genetic information, and any other characteristic which may be specified in applicable laws and governmental regulations. (Consult the Office of the Vice President, Student Affairs, for the provisions of Title VI and IX.)
- vii. Student organizations capable of maintaining financial autonomy shall be allowed to do so. Provision by the university for handling budgets and accounts, banking and other financial services shall in no way indicate a prerogative on the part of the university to control funds, except through prescribed procedures designed to redress justified grievances or uphold university regulations.
- viii. Student organizations, in consultation and coordination with the university, may publicize their events and solicit participation in them from the university and outside community. (See Part G. Student Organizations.)

(Portions of this section excerpted from the AAUP's Joint Statement on Rights and Freedoms of Students)

Adopted by the Board of Trustees, subject to the resolution on Power of the Board. It has been updated to reflect current policies.

**Section 4 – Equal Opportunity**

**I. Policy**

The University of Southern California is an equal opportunity employer and educator, proudly pluralistic and firmly committed to providing equal opportunity for outstanding men and women of every race, creed and background. The university strives to maintain a community in which each person respects the rights of other people to live, work and learn in peace and dignity, be proud of who and what they are, and to have equal opportunity to realize their full potential as

06/22/2018

individuals and members of society. To this end, the university places great emphasis on those values and virtues that bind us together as human beings and members of the Trojan Family. The university enthusiastically supports this policy in its entirety, and expects that every person associated with the university will give continuing support to its implementation.

The university is committed to complying with all applicable laws and governmental regulations at every level of government which prohibit discrimination against, or which mandate that special consideration be given to, students and applicants for admission, or faculty, staff and applicants for employment, on the basis of any protected category, including race, color, national origin, ancestry, religion, gender, sexual orientation, age, physical disability, mental disability, marital status, veteran status, genetic information, or any other characteristic which may be specified in such laws and regulations. Gender includes both the actual sex of an individual and that person's gender identity, appearance or behavior, whether or not that identity, appearance or behavior is traditionally associated with that person's sex at birth. This policy applies to all of the university's educational programs and activities including admissions, and all personnel actions including but not limited to recruiting, hiring, promotion, demotion, compensation, benefits, transfers, layoffs, return from layoff, provision of leaves, training, education, tuition assistance and other programs. In addition, an otherwise qualified individual must not be discriminated against in, or excluded from, admissions, participation in educational programs and activities, or employment solely due to his or her disability.

The university seeks compliance with all statutes prohibiting discrimination in education, including Title VI and Title VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and the Americans with Disabilities Act of 1990 which respectively prohibit discrimination. This good faith effort to comply is made even when such laws and regulations conflict with each other.

The university will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. Further information is available from Human Resources Administration at [uschr@usc.edu](mailto:uschr@usc.edu) or (213) 821-8100.

The Disabled/Veterans Affirmative Action Plan may be reviewed by employees and applicants upon request. Questions regarding the application of the various rules and regulations concerning equal employment opportunity, affirmative action, and non-discrimination should also be addressed to the Office of Equity and Diversity at [oed@usc.edu](mailto:oed@usc.edu), or:

University Park Campus:  
3720 S. Flower Street 2nd floor  
Credit Union Building, 200  
Los Angeles, California 90089-0704  
(213) 740-5086

Health Science Campus:  
2001 N. Soto Street, Suite 203  
Los Angeles, CA 90002-9236  
(323) 442-2020

## II. Equal Access for Students with Disabilities

In addition, an otherwise qualified individual must not be denied admissions, participation in educational programs and activities, or employment due to their disability. University policies and procedures will ensure that students and student applicants with disabilities will be provided full and equal access to and enjoyment of academic and co-curricular programs or activities, regardless of disability status, in an environment free from discrimination or harassment. The Office of Disability Services and Programs is the campus unit that reviews requests for and determines reasonable student accommodations and auxiliary aids and services. For more information on accommodations and auxiliary aids and services for any student, or student applicant, with a disability, contact the Office of Disability Services and Programs at (213) 740-0776 or [ability@usc.edu](mailto:ability@usc.edu).

## Section 5 – Principles of Community

USC is a multicultural community of people from diverse racial, ethnic, gender, and class backgrounds, national origins, faith backgrounds, political beliefs, abilities, and sexual orientations. Our activities, programs, classes, workshops, lectures, and everyday interactions are enriched by our acceptance of one another, and we strive to learn from each other in an atmosphere of positive engagement and mutual respect.

06/22/2018

We want to make explicit our expectations regarding the behavior of each member of our community. As adults, we are responsible for our behavior and are fully accountable for our actions. We each must take responsibility for our awareness of racism, sexism, ageism, xenophobia, homophobia, transphobia, ableism and other forms of discrimination.

Bigotry will not go unchallenged within this community. No one has the right to denigrate another human being on the basis of race, sex, sexual orientation, national origins, and other identities. We will not tolerate verbal or written abuse, threats, harassment, intimidation, or violence against person or property. In this context, we do not accept alcohol or substance abuse as an excuse, reason, or rationale for such abuse, harassment, intimidation or violence. Ignorance or "it was just a joke" is also not an excuse for such behavior.

All who work, live, study, and teach in the USC community are here by choice, and as part of that choice should be committed to these principles which are an integral part of the USC's focus, goals, and mission.

## Section 6 – Code of Ethics at the University of Southern California

See Code of Ethics of USC at [policy.usc.edu/ethics](http://policy.usc.edu/ethics)

## Section 7 – Department of Education Compliance

The Department of Education requires each state to have an external agency responsible for handling complaints related to the university's compliance with applicable laws. In California, this external agency is the Bureau for Private Post-Secondary Education. Complaints that suggest the university may not be in compliance with applicable laws may be directed to:

Bureau for Private Postsecondary Education  
2535 Capitol Oaks Drive, Suite 400  
Sacramento, CA 95833  
Telephone: (916) 431-6959 ☎  
[bpppe.ca.gov/enforcement/complaint.shtml](http://bpppe.ca.gov/enforcement/complaint.shtml)

Additionally, the university is accredited by the WASC Senior College and University Commission. Complaints demonstrating a possible violation of the Commission's Standards of Accreditation and Commission policies and procedures should be directed to:

WASC Senior College and University Commission  
985 Atlantic Avenue, Suite 100  
Alameda, CA 94501  
Phone: (510) 748-9001 ☎  
[wascsenior.org/comments](http://wascsenior.org/comments)

USC Employee Engagement and Communications oversees this website as well as university policy development and communication.

✉ [scpolicy@usc.edu](mailto:scpolicy@usc.edu)

Website by USC Web Services

06/22/2018

BLUERFDonline.com (888) 474-9700

06/22/2018

Exhibit 4



**Top Performing Chapters by Council**

- Alpha Delta Kappa, Asian Greek Council (3.70)
- Beta Theta Pi, Interfraternity Greek Council (3.44)
- La Unidad Latina, Lambda Upsilon Lambda Fraternity, Inc. Multicultural Greek Council (4.00)
- Phi Beta Sigma, National Pan-Hellenic Greek Council (3.68)
- Alpha Delta Pi, Panhellenic Council (3.59)

**Chapters with an Overall Semester GPA of 3.50 or above**

- La Unidad Latina, Lambda Upsilon Lambda Fraternity, Inc. Multicultural Greek Council (4.00)
- Alpha Delta Kappa, Asian Greek Council (3.70)
- Phi Beta Sigma, National Pan-Hellenic Council (3.68)
- Alpha Delta Pi, Panhellenic Council (3.59)
- Delta Delta Delta, Panhellenic Council (3.55)
- Delta Phi Kappa, Asian Greek Council (3.53)
- Kappa Alpha Theta, Panhellenic Council (3.53)
- Pi Beta Phi, Panhellenic Council (3.51)
- Gamma Phi Beta, Panhellenic Council (3.50)

**Top Performing Chapter**

- La Unidad Latina, Lambda Upsilon Lambda Fraternity, Inc. Multicultural Greek Council (4.00)

**Class Performance**

- U1 3.19
- U2 3.32
- U3 3.38
- U4 3.45

**Top Performing Students**

- 245 Students with 4.0 GPAs
- 762 Students with 3.99-3.75 GPAs
- 867 Students with 3.74-3.50 GPAs

**The USC Greek Community has 53 Chapters**

**The USC Greek Community accounts for 20.36% of Undergraduate Students**

**37.73% of Chapters rank above the All Greek and All Undergraduate GPA (3.35)**

**All Panhellenic Chapters rank above both the All Greek and All Undergraduate GPA (3.35)**

3607 Trousdale Parkway TCC 330, Los Angeles, CA 90089 • Tel: (213) 821-1639 • USCFSLD@usc.edu

98/22/2918





CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): R. Alexander Pilmer, P.C. (SBN 166196) Jeffrey S. Sinek (SBN 135508) Kirkland & Ellis LLP, 333 South Hope Street, 29th Floor, Los Angeles, CA 90071  TELEPHONE NO.: (213) 680-8400 FAX NO.: (213) 680-8500 ATTORNEY FOR (Name): Omicron Chapter of Kappa Alpha Theta Sorority, et al.	<b>FOR COURT USE ONLY</b>  <div style="border: 1px solid black; padding: 5px; display: inline-block;"> <b>FILED</b>          Superior Court of California          County of Los Angeles           JUN 22 2018           Sherri R. Carter, Executive Officer/Clerk          Deputy       </div> CASE NUMBER: Nancy Alvarez  JUDGE: <b>BC 7 1 1 1 5 5</b> DEPT:		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: 111 N. Hill Street CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Stanley Mosk Courthouse			
CASE NAME: <b>Omicron Chapter of Kappa Alpha Theta Sorority, et al. v. USC</b>			
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%; padding: 5px;"> <b>CIVIL CASE COVER SHEET</b>  <input checked="" type="checkbox"/> <b>Unlimited</b> (Amount demanded exceeds \$25,000)  <input type="checkbox"/> <b>Limited</b> (Amount demanded is \$25,000 or less)         </td> <td style="width:50%; padding: 5px;"> <b>Complex Case Designation</b>  <input type="checkbox"/> <b>Counter</b>    <input type="checkbox"/> <b>Joinder</b>          Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)       </td> </tr> </table>		<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> <b>Unlimited</b> (Amount demanded exceeds \$25,000) <input type="checkbox"/> <b>Limited</b> (Amount demanded is \$25,000 or less)	<b>Complex Case Designation</b> <input type="checkbox"/> <b>Counter</b> <input type="checkbox"/> <b>Joinder</b> Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)
<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> <b>Unlimited</b> (Amount demanded exceeds \$25,000) <input type="checkbox"/> <b>Limited</b> (Amount demanded is \$25,000 or less)	<b>Complex Case Designation</b> <input type="checkbox"/> <b>Counter</b> <input type="checkbox"/> <b>Joinder</b> Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)		

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

<b>Auto Tort</b> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) <b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) <b>Non-PI/PD/WD (Other) Tort</b> <input type="checkbox"/> Business tort/unfair business practice (07) <input checked="" type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) <b>Employment</b> <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<b>Contract</b> <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) <b>Real Property</b> <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) <b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <b>Judicial Review</b> <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	<b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</b> <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) <b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20) <b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) <b>Miscellaneous Civil Petition</b> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
---	--	--

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- |  |  |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> Substantial postjudgment judicial supervision  |
3. Remedies sought (check all that apply): a.  monetary    b.  nonmonetary; declaratory or injunctive relief    c.  punitive
4. Number of causes of action (specify): **One**
5. This case  is  is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM 015.)

Date: June 22, 2018  
 R. Alexander Pilmer, P.C. (SBN 166196)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

**NOTICE**

Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.

File this cover sheet in addition to any cover sheet required by local court rule.

If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.

Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

Adopted for Mandatory Use  
 Judicial Council of California  
 CM-010 (Rev. July 1, 2007)

**CIVIL CASE COVER SHEET**

Cal. Rules of Court, rules 2.30, 3.220, 3.400-3.403, 3.740;  
 Cal. Standards of Judicial Administration, std. 3.10  
 www.courtinfo.ca.gov

**ORIGINAL**

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the Civil Case Cover Sheet contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the Civil Case Cover Sheet to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

- Auto (22)--Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

- Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability (not asbestos or toxic/environmental) (24)
Medical Malpractice (45)
Medical Malpractice--Physicians & Surgeons
Other Professional Health Care Malpractice
Other PI/PD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

- Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (not civil harassment) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (not medical or legal)
Other Non-PI/PD/WD Tort (35)

Employment

- Wrongful Termination (36)
Other Employment (15)

Contract

- Breach of Contract/Warranty (06)
Breach of Rental/Lease
Contract (not unlawful detainer or wrongful eviction)
Contract/Warranty Breach--Seller Plaintiff (not fraud or negligence)
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case--Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (not provisionally complex) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

- Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (not eminent domain, landlord/tenant, or foreclosure)

Unlawful Detainer

- Commercial (31)
Residential (32)
Drugs (38) (if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)

Judicial Review

- Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ--Administrative Mandamus
Writ--Mandamus on Limited Court Case Matter
Writ--Other Limited Court Case Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal--Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400-3.403)

- Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (arising from provisionally complex case type listed above) (41)

Enforcement of Judgment

- Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (non-domestic relations)
Sister State Judgment
Administrative Agency Award (not unpaid taxes)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

- RICO (27)
Other Complaint (not specified above) (42)
Declaratory Relief Only
Injunctive Relief Only (non-harassment)
Mechanics Lien
Other Commercial Complaint Case (non-tort/non-complex)
Other Civil Complaint (non-tort/non-complex)

Miscellaneous Civil Petition

- Partnership and Corporate Governance (21)
Other Petition (not specified above) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition

05/12/201

SHORT TITLE: Omicron Chapter of Kappa Alpha Theta Sorority, et al. v. USC	CASE NUMBER
---	-------------

BC 711155

**CIVIL CASE COVER SHEET ADDENDUM AND  
STATEMENT OF LOCATION  
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court.

**Step 1:** After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

**Step 2:** In Column B, check the box for the type of action that best describes the nature of the case.

**Step 3:** In Column C, circle the number which explains the reason for the court filing location you have chosen.

**Applicable Reasons for Choosing Court Filing Location (Column C)**

- |  |  |
|--|--|
| 1. Class actions must be filed in the Stanley Mosk Courthouse, Central District. | 7. Location where petitioner resides.  |
| 2. Permissive filing in central district.  | 8. Location wherein defendant/respondent functions wholly.   |
| 3. Location where cause of action arose.   | 9. Location where one or more of the parties reside.   |
| 4. Mandatory personal injury filing in North District.                           | 10. Location of Labor Commissioner Office.   |
| 5. Location where performance required or defendant resides.                     | 11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection, or personal injury). |
| 6. Location of property or permanently garaged vehicle.                          |  |

Auto Tort  
Other Personal Injury/Property Damage/Wrongful Death Tort

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1, 4, 11
Uninsured-Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1, 4, 11
Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage	1, 11
	<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	1, 11
Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1, 4, 11
Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1, 4, 11
	<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1, 4, 11
Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1, 4, 11
	<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1, 4, 11
	<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1, 4, 11
	<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1, 4, 11

**ORIGINAL**

SHORT TITLE: Omicron Chapter of Kappa Alpha Theta Sorority, et al. v. USC	CASE NUMBER
---	-------------

Non-Personal Injury/Property Damage/Wrongful Death Tort

Employment

Contract

Real Property

Unlawful Detainer

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 3
Civil Rights (08)	<input checked="" type="checkbox"/> A6005 Civil Rights/Discrimination	1, 2, 3
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1, 2, 3
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1, 2, 3
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	1, 2, 3
	<input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1, 2, 3
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	1, 2, 3
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case	1, 2, 3
	<input type="checkbox"/> A6109 Labor Commissioner Appeals	10
Breach of Contract/Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	2, 5
	<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2, 5
	<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1, 2, 5
	<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1, 2, 5
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	5, 6, 11
	<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	5, 11
	<input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1, 2, 5, 8
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud	1, 2, 3, 5
	<input type="checkbox"/> A6031 Tortious Interference	1, 2, 3, 5
	<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1, 2, 3, 8, 9
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels _____	2, 6
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2, 6
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2, 6
	<input type="checkbox"/> A6032 Quiet Title	2, 6
	<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
Unlawful Detainer-Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6, 11

05/22/2014

SHORT TITLE: <b>Omicron Chapter of Kappa Alpha Theta Sorority, et al. v. USC</b>	CASE NUMBER
--	-------------

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
<b>Judicial Review</b>	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2, 3, 6
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2, 5
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2, 8 2 2
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2, 8
<b>Provisionally Complex Litigation</b>	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1, 2, 8
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1, 2, 3
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1, 2, 8
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1, 2, 8
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1, 2, 3, 8
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1, 2, 5, 8
<b>Enforcement of Judgment</b>	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment	2, 5, 11
		<input type="checkbox"/> A6160 Abstract of Judgment	2, 6
		<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2, 9
		<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2, 8
		<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2, 8
<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2, 8, 9		
<b>Miscellaneous Civil Complaints</b>	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1, 2, 8
	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only	1, 2, 8
		<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2, 8
		<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1, 2, 8
<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1, 2, 8		
<b>Miscellaneous Civil Petitions</b>	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2, 8
	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment	2, 3, 9
		<input type="checkbox"/> A6123 Workplace Harassment	2, 3, 9
		<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2, 3, 9
		<input type="checkbox"/> A6190 Election Contest	2
		<input type="checkbox"/> A6110 Petition for Change of Name/Change of Gender	2, 7
		<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2, 3, 8
<input type="checkbox"/> A6100 Other Civil Petition		2, 9	

05/22/2011

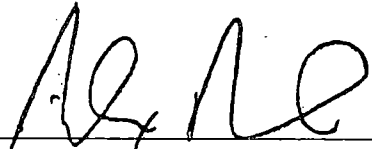
SHORT TITLE: Omicron Chapter of Kappa Alpha Theta Sorority, et al. v. USC	CASE NUMBER
--	-------------

**Step 4: Statement of Reason and Address:** Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON: <input type="checkbox"/> 1. <input type="checkbox"/> 2. <input checked="" type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11.			ADDRESS: University of Southern California 3551 Trousdale Parkway, ADM 352 Los Angeles, CA 90089
CITY: Los Angeles	STATE: CA	ZIP CODE: 90089	

**Step 5: Certification of Assignment:** I certify that this case is properly filed in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated: June 22, 2018

  
 (SIGNATURE OF ATTORNEY/FILING PARTY)

**PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:**

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

06/22/2018