

TYLER KIM

Plaintiff(s)

vs.

Pi Kappa Phi Fraternity; Alpha Chapter of Pi Kappa Phi Fraternity; Pi Kappa Phi Properties; Richard M. Pierce. Individually and in his Official Capacity as Alpha Chapter Advisor; Brooke M. Kingsley Isbell. Individually and in her Official Capacity as Pi Kappa Phi Fraternity Director of Prevention Education; Justin Angotti, Individually and in his Official Capacity as Pi Kappa Phi Assistant Executive Director of Education & Accountability; Sean Daily; Matthew Lounge; Nikos Lara; and Steve Leone.

Defendant(s)

Submitted By: Mark A. Peper, Esq.

Address: The Peper Law Firm, PA
548 Savannah Highway
Charleston, SC 29407

CIVIL ACTION COVERSHEET

2017-CP - 10-

3888

FILED
2017 AUG - 1 PM 2:13
JULIE J. ARMSTRONG
CLERK OF COURT

SC Bar #: 72624

Telephone #: 843-225-2520

Fax #: 843-225-2554

Other:

E-mail: mark@peperlawfirm.com

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint.

DOCKETING INFORMATION (Check all that apply)

*If Action is Judgment/Settlement do not complete

- ☒ JURY TRIAL demanded in complaint. ☐ NON-JURY TRIAL demanded in complaint.
☐ This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
☐ This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
☐ This case is exempt from ADR. (Proof of ADR/Exemption Attached)

NATURE OF ACTION (Check One Box Below)

- | | | | |
|---|--|---|--|
| Contracts
<input type="checkbox"/> Constructions (100)
<input type="checkbox"/> Debt Collection (110)
<input type="checkbox"/> General (130)
<input type="checkbox"/> Breach of Contract (140)
<input type="checkbox"/> Fraud/Bad Faith (150)
<input type="checkbox"/> Failure to Deliver Warranty (160)
<input type="checkbox"/> Employment Discrim (170)
<input type="checkbox"/> Employment (180)
<input type="checkbox"/> Other (199) _____ | Torts - Professional Malpractice
<input type="checkbox"/> Dental Malpractice (200)
<input type="checkbox"/> Legal Malpractice (210)
<input type="checkbox"/> Medical Malpractice (220)
Previous Notice of Intent Case #
20 ____ -NI- ____ -
<input type="checkbox"/> Notice/ File Med Mal (230)
<input type="checkbox"/> Other (299) _____ | Torts - Personal Injury
<input type="checkbox"/> Conversion (310)
<input type="checkbox"/> Motor Vehicle Accident (320)
<input type="checkbox"/> Premises Liability (330)
<input type="checkbox"/> Products Liability (340)
<input checked="" type="checkbox"/> Personal Injury (350)
<input type="checkbox"/> Wrongful Death (360)
<input type="checkbox"/> Assault/Battery (370)
<input type="checkbox"/> Slander/Libel (380)
<input type="checkbox"/> Other (399) _____ | Real Property
<input type="checkbox"/> Claim & Delivery (400)
<input type="checkbox"/> Condemnation (410)
<input type="checkbox"/> Foreclosure (420)
<input type="checkbox"/> Mechanic's Lien (430)
<input type="checkbox"/> Partition (440)
<input type="checkbox"/> Possession (450)
<input type="checkbox"/> Building Code Violation (460)
<input type="checkbox"/> Other (499) _____ |
| Inmate Petitions
<input type="checkbox"/> PCR (500)
<input type="checkbox"/> Mandamus (520)
<input type="checkbox"/> Habeas Corpus (530)
<input type="checkbox"/> Other (599) _____ | Administrative Law/Relief
<input type="checkbox"/> Reinstate Drv. License (800)
<input type="checkbox"/> Judicial Review (810)
<input type="checkbox"/> Relief (820)
<input type="checkbox"/> Permanent Injunction (830)
<input type="checkbox"/> Forfeiture-Petition (840)
<input type="checkbox"/> Forfeiture-Consent Order (850)
<input type="checkbox"/> Other (899) _____ | Judgments/Settlements
<input type="checkbox"/> Death Settlement (700)
<input type="checkbox"/> Foreign Judgment (710)
<input type="checkbox"/> Magistrate's Judgment (720)
<input type="checkbox"/> Minor Settlement (730)
<input type="checkbox"/> Transcript Judgment (740)
<input type="checkbox"/> Lis Pendens (750)
<input type="checkbox"/> Transfer of Structured Settlement Payment Rights Application (760)
<input type="checkbox"/> Confession of Judgment (770)
<input type="checkbox"/> Petition for Workers Compensation Settlement Approval (780) | Appeals
<input type="checkbox"/> Arbitration (900)
<input type="checkbox"/> Magistrate-Civil (910)
<input type="checkbox"/> Magistrate-Criminal (920)
<input type="checkbox"/> Municipal (930)
<input type="checkbox"/> Probate Court (940)
<input type="checkbox"/> SCDOT (950)
<input type="checkbox"/> Worker's Comp (960)
<input type="checkbox"/> Zoning Board (970)
<input type="checkbox"/> Public Service Comm. (990)
<input type="checkbox"/> Employment Security Comm (991) |
| Special/Complex /Other
<input type="checkbox"/> Environmental (600) <input type="checkbox"/> Pharmaceuticals (630)
<input type="checkbox"/> Automobile Arb. (610) <input type="checkbox"/> Unfair Trade Practices (640) | | | |

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| <input type="checkbox"/> Medical (620) | <input type="checkbox"/> Out-of State Depositions (650) | <input type="checkbox"/> Other (799) _____ | Other (999) _____ |
| <input type="checkbox"/> Other (699) _____ | <input type="checkbox"/> Motion to Quash Subpoena in an Out-of-County Action (660) | | |
| <input type="checkbox"/> Sexual Predator (510) | <input type="checkbox"/> Pre-Suit Discovery (670) | | |
| <input type="checkbox"/> Permanent Restraining Order (680) | | | |

Submitting Party Signature: _____

Date: _____

8/1/17

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCP, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

Effective January 1, 2016, Alternative Dispute Resolution (ADR) is mandatory in all counties, pursuant to Supreme Court Order dated November 12, 2015.

SUPREME COURT RULES REQUIRE THE SUBMISSION OF ALL CIVIL CASES TO AN ALTERNATIVE DISPUTE RESOLUTION PROCESS, UNLESS OTHERWISE EXEMPT.

Pursuant to the ADR Rules, you are required to take the following action(s):

1. The parties shall select a neutral and file a "Proof of ADR" form on or by the 210th day of the filing of this action. If the parties have not selected a neutral within 210 days, the Clerk of Court shall then appoint a primary and secondary mediator from the current roster on a rotating basis from among those mediators agreeing to accept cases in the county in which the action has been filed.
2. The initial ADR conference must be held within 300 days after the filing of the action.
3. Pre-suit medical malpractice mediations required by S.C. Code §15-79-125 shall be held not later than 120 days after all defendants are served with the "Notice of Intent to File Suit" or as the court directs.
4. Cases are exempt from ADR only upon the following grounds:
 - a. Special proceeding, or actions seeking extraordinary relief such as mandamus, habeas corpus, or prohibition;
 - b. Requests for temporary relief;
 - c. Appeals
 - d. Post Conviction relief matters;
 - e. Contempt of Court proceedings;
 - f. Forfeiture proceedings brought by governmental entities;
 - g. Mortgage foreclosures; and
 - h. Cases that have been previously subjected to an ADR conference, unless otherwise required by Rule 3 or by statute.
5. In cases not subject to ADR, the Chief Judge for Administrative Purposes, upon the motion of the court or of any party, may order a case to mediation.
6. Motion of a party to be exempt from payment of neutral fees due to indigency should be filed with the Court within ten (10) days after the ADR conference has been concluded.

Please Note: You must comply with the Supreme Court Rules regarding ADR.
Failure to do so may affect your case or may result in sanctions.

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
CIVIL ACTION NO. 2017-CP-10-3888

Tyler Kim)

Plaintiff,)

vs.)

Pi Kappa Phi Fraternity; Alpha Chapter of)
Pi Kappa Phi Fraternity; Pi Kappa Phi)
Properties; Richard M. Pierce, Individually)
and in his Official Capacity as Alpha)
Chapter Advisor; Brooke M. Kingsley Isbell,)
Individually and in her Official Capacity as)
Pi Kappa Phi Fraternity Director of)
Prevention Education; Justin Angotti,)
Individually, and in his Official Capacity as)
Pi Kappa Phi Fraternity Assistant Executive)
Director of Education & Accountability;)
Sean Daily; Matthew Louge; Nikos Lara;)
and Steve Leone.)

Defendants.)

SUMMONS
(JURY TRIAL DEMANDED)

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CLERK OF COURT

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is served upon you, and to serve a copy of your Answer to this Complaint upon counsel for the Plaintiff, Mark A. Peper, at 548 Savannah Highway, Charleston, SC 29407, within thirty (30) days after service hereof, exclusive of the day of service. If you fail to answer this Complaint within the aforesaid time, judgment by default shall be rendered against you for the relief demanded in the Complaint.

This 1 day of August, 2017
Charleston, South Carolina

THE PEPPER LAW FIRM, PA



Mark A. Peper, Esq
Julian A. Ferguson, Esq.
548 Savannah Highway
Charleston, South Carolina 29407
Phone: (843) 225-2520
Mark@PeperLawFirm.com

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
CIVIL ACTION NO. 2017-CP-10-35888

Tyler Kim)

Plaintiff,)

vs.)

Pi Kappa Phi Fraternity; Alpha Chapter of)
Pi Kappa Phi Fraternity; Pi Kappa Phi)
Properties; Richard M. Pierce, Individually)
and in his Official Capacity as Alpha)
Chapter Advisor; Brooke M. Kingsley Isbell,)
Individually and in her Official Capacity as)
Pi Kappa Phi Fraternity Director of)
Prevention Education; Justin Angotti,)
Individually, and in his Official Capacity as)
Pi Kappa Phi Fraternity Assistant Executive)
Director of Education & Accountability;)
Sean Daily; Matthew Louge; Nikos Lara;)
and Steve Leone.)

Defendants.)

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CLERK OF COURT

COMPLAINT
(JURY TRIAL DEMANDED)

COMES NOW Plaintiff Tyler Kim, by and through his undersigned counsel, complaining of Defendants Pi Kappa Phi Fraternity; Alpha Chapter of Pi Kappa Phi Fraternity; Pi Kappa Phi Properties; Richard M. Pierce, Individually and in his Official Capacity as Alpha Chapter Advisor; Brooke M. Kingsley Isbell, Individually and in her Official Capacity as Pi Kappa Phi Fraternity Director of Prevention Education; Justin Angotti, Individually and in his Official Capacity as Pi Kappa Phi Fraternity Assistant Director of Education & Accountability; Sean Daily; Matthew Louge; Nikos Lara; and Steve Leone, jointly and severally, would allege and show unto the Court the following:

PARTIES AND JURISDICTION

1. That Plaintiff Tyler Kim (hereinafter "Plaintiff") is, at all times relevant to this Complaint, a resident of Charleston County, South Carolina.

2. That Defendant Pi Kappa Phi Fraternity (hereinafter “Pi Kappa”) is a domestic 501(c)3 non-profit corporation that conducts its affairs and business activities in the State of South Carolina, and more particularly, was conducting such business activities in Charleston County, South Carolina at the time the causes of action arose, and further, has agents, employees, offices and/or properties located in the County of Charleston, State of South Carolina. Pi Kappa controls and directs all activities of its chapters throughout the country, including the Alpha Chapter of Pi Kappa Phi Fraternity located in Charleston County, South Carolina.

3. That Defendant Alpha Chapter of Pi Kappa Phi Fraternity (hereinafter “Alpha Chapter”) was founded in Charleston, South Carolina on December 10, 1904, is the Supreme Chapter of Pi Kappa, and conducts its affairs and business activities in the State of South Carolina, and more particularly, was conducting such business activities in Charleston County, South Carolina at the time the causes of action arose, and further, was acting by and through its members, agents, servants, employees, and/or officers, including, but not limited to those persons and/or individuals named in this Complaint.

4. That Defendant Pi Kappa Phi Fraternity Properties (hereinafter “Properties”) is a foreign 501(c)3 non-profit corporation organized under the laws of the State of Florida that conducts its affairs and business activities in the State of South Carolina, and more particularly, was conducting such business activities in Charleston County, South Carolina at the time the causes of action arose, and further, has agents, employees, offices and/or properties located in the County of Charleston, State of South Carolina. Specifically, Properties is the fraternity’s national housing corporation established to aid in the management of chapter housing, and owned and operated the property where the causes of action arose. Properties is subject to personal jurisdiction in the courts of the State of South Carolina pursuant to S.C. Code Ann. § 36-2-803.

5. That Pi Kappa is a top down organization structured in the mold of a traditional corporation with all directives, decisions, actions or instructions flowing directly from its officers down to its employees and agents. Those officers are directly responsible for the acts or omissions of its employees and agents.

6. That Defendant Richard M. Pierce (hereinafter “Chapter Advisor”) is an individual, citizen and resident of Charleston County, South Carolina. At all times relevant herein to this Complaint, Chapter Advisor, acting as an agent of Pi Kappa, was the Alpha Chapter Advisor and directly oversaw all conduct and activity of the Alpha Chapter and its member agents. Chapter Advisor was appointed by the Pi Kappa National Council and was charged with advising students of the potential and perceived risks involved in chapter activities and events and on the approach to managing chapter operations. Chapter Advisor oversaw the entire operation of the Alpha Chapter located in Charleston, South Carolina and at all times had the authority to act on its behalf. Chapter Advisor was acting within the course and scope of his agency at the time the causes of action arose.

7. That Defendant Brooke M. Kingsley Isbell (hereinafter “Director of Prevention Education”) is an individual, citizen and resident of Richmond, Virginia and was employed by Pi Kappa as Director of Prevention Education at all times relevant to this complaint. Director of Prevention Education was charged with responsibility for developing and managing the menu of programs and initiatives intended to prevent and address the negative behaviors associated with alcohol and drug abuse, hazing, sexual abuse and harassment for all chapters of Pi Kappa, including the Alpha Chapter located in Charleston County, South Carolina. Director of Prevention Education was acting within the course and scope of her employment at the time the causes of action arose.

8. That Defendant Justin Angotti (hereinafter “Director of Accountability”) is an individual, citizen and resident of Mecklenburg County, North Carolina and was employed by Pi Kappa as Assistant Executive Director of Education & Accountability at all times relevant to this complaint. Director of Accountability was charged with responsibility for the development and execution of the Alpha Chapter’s education and assessment strategy, including leadership development programs, officer and key committee chairman resources, member education, chapter advisor training and resources, and prevention education. Further, Director of Accountability oversaw the implementation of the Alpha Chapter’s risk management policies and managed the individual member and Alpha Chapter conduct processes. Director of Accountability was acting within the course and scope of his employment at the time the causes of action arose.

9. That Defendant Sean Daily (hereinafter “Member Agent 1”) is, at all times relevant to this complaint, a resident of Charleston County, South Carolina and was a member agent of the Alpha Chapter and acting at the direction and on behalf of the Alpha Chapter and within the course and scope of his agency at the time the causes of action arose.

10. That Defendant Matthew Louge (hereinafter “Member Agent 2”) is, at all times relevant to this complaint, a resident of Charleston County, South Carolina and was a member agent of the Alpha Chapter and acting at the direction and on behalf of the Alpha Chapter within the course and scope of his agency at the time the causes of action arose.

11. That Defendant Nikos Lara (hereinafter “Member Agent 3”) is, at all times relevant to this complaint, a resident of Charleston County, South Carolina and was a member agent of the Alpha Chapter and acting at the direction and on behalf of the Alpha Chapter within the course and scope of his agency at the time the causes of action arose.

12. That Defendant Steve Leone (hereinafter “Member Agent 4”) is, at all times relevant to this complaint, a resident of Charleston County, South Carolina and was a member

8. That Defendant Justin Angotti (hereinafter “Director of Accountability”) is an individual, citizen and resident of Mecklenburg County, North Carolina and was employed by Pi Kappa as Assistant Executive Director of Education & Accountability at all times relevant to this complaint. Director of Accountability was charged with responsibility for the development and execution of the Alpha Chapter’s education and assessment strategy, including leadership development programs, officer and key committee chairman resources, member education, chapter advisor training and resources, and prevention education. Further, Director of Accountability oversaw the implementation of the Alpha Chapter’s risk management policies and managed the individual member and Alpha Chapter conduct processes. Director of Accountability was acting within the course and scope of his employment at the time the causes of action arose.

9. That Defendant Shawn Daily (hereinafter “Member Agent 1”) is, at all times relevant to this complaint, a resident of Charleston County, South Carolina and was a member agent of the Alpha Chapter and acting at the direction and on behalf of the Alpha Chapter and within the course and scope of his agency at the time the causes of action arose.

10. That Defendant Matthew Louge (hereinafter “Member Agent 2”) is, at all times relevant to this complaint, a resident of Charleston County, South Carolina and was a member agent of the Alpha Chapter and acting at the direction and on behalf of the Alpha Chapter within the course and scope of his agency at the time the causes of action arose.

11. That Defendant Nikos Lara (hereinafter “Member Agent 3”) is, at all times relevant to this complaint, a resident of Charleston County, South Carolina and was a member agent of the Alpha Chapter and acting at the direction and on behalf of the Alpha Chapter within the course and scope of his agency at the time the causes of action arose.

12. That Defendant Steve Leone (hereinafter “Member Agent 4”) is, at all times relevant to this complaint, a resident of Charleston County, South Carolina and was a member

agent of the Alpha Chapter and acting at the direction and on behalf of the Alpha Chapter within the course and scope of his agency at the time the causes of action arose.

13. That venue is proper in this Court pursuant to § 15-7-30 South Carolina Code of Laws Annotated.

14. That this Court has personal jurisdiction over the parties and subject matter jurisdiction over the claims set forth herein.

CASE OVERVIEW

15. The Supreme Court of South Carolina said, “It is a trite saying that charity begins at home...men and corporations alike are required to be just before being charitable...” The Supreme Court recognized the irony presented under the facts set forth below: “it is almost contradictory to hold that an institution organized to dispense charity shall be charitable and extend aid to others, but shall not compensate or aid those injured by it in carrying on its activities.” *Fitzer v. Greater Greenville South Carolina Young Men’s Christian Ass’n*, 277 S.C. 1, 4, 282 S.E. 2d 230, 232 (1981) (quoting *Geiger v. Simpson Methodist-Episcopal Church of Minneapolis*, 174 Minn. 389, 219 N.W. 463, 465 (1928)).

16. This case arises out of the “anything goes” custom and culture created by Pi Kappa within its Alpha Chapter, leading to the brutal beating of Plaintiff by and at the direction of its member agents. Their repeated and continuous drug and alcohol abuse, multiple incidents of hazing and acts of violence, and refusal to implement, follow and enforce risk management policies over the course of several years were ignored by the Defendants, including Chapter Advisor, Director of Prevention Education, Director of Accountability and others, who instead, conspired to cover up these acts to protect the interests and image of Pi Kappa at all costs.

17. This case is not just about the lions, but those who let the lions out of their cage.

18. On April 15-16, 2017, Alpha Chapter hosted an initiation party at the Pi Kappa fraternity house wherein it supplied copious amounts of alcohol and illegal drugs to its member agents and guests.

19. An argument occurred between the Plaintiff and a newly initiated member agent of Pi Kappa.

20. Plaintiff was forcefully kicked out of the party, and member agents of Pi Kappa threatened to kill him if he ever returned.

21. Shortly thereafter, Plaintiff received a written threat from a member agent of Pi Kappa that eighty (80) of his brothers were coming to bury him.

22. As promised, four (4) member agents of Pi Kappa broke into the personal residence of Plaintiff and physically beat him to a pulp, leaving him in and out of consciousness, profusely bleeding, and helpless.

23. Pi Kappa member agents then spread the word of their successful lynching of Plaintiff throughout the fraternity and college campus.

24. Chapter Advisor immediately instructed the member agents to take all action necessary to prevent Plaintiff from seeking medical treatment or having any further communication with law enforcement.

25. As instructed, two (2) member agents collected Plaintiff from his residence and held him captive for the remainder of the night.

26. While being restrained, Plaintiff was personally contacted by Chapter Advisor, who in no uncertain terms, strongly discouraged him from seeking any medical treatment for his injuries or having any additional contact with law enforcement.

27. Plaintiff was finally returned to his residence and escorted inside by member agents only after they were certain Plaintiff would comply with these instructions.

28. At all times prior to, during, and following the above, the sole focus of the Defendants was to protect the interests and image of Pi Kappa at all costs, even at the expense of Plaintiff.

FACTUAL ALLEGATIONS

29. That Pi Kappa was “founded on the premise of creating leadership opportunities for our members. Our founders exemplified leadership in the classroom, on the athletic field, in campus politics and within the community of Charleston. Leadership is the very root of our organization, and it is the concept of leadership that shall guide us to our future.” <http://www.pikapp.org/content.aspx?id=162> .

30. That the members of which Pi Kappa considers to be “notable, famous, and considered to be Pi Kappa’s most prestigious and dedicated members” are: Carrol A. Campbell, Jr. (Sigma – South Carolina. Former Governor of SC), Lindsey Graham (Alpha – Charleston. US Senator – SC), Ernest “Fritz” Hollings (Alpha – Charleston. Former US Senator – SC), Olin D. Johnston (Zeta – Wofford. Former Governor of SC), George B. Timmerman, Jr. (Sigma – South Carolina. Former Governor of SC), Glenn McConnell (Alpha – Charleston. President – College of Charleston). <http://www.pikapp.org/content.aspx?id=484>.

31. That the mission of Pi Kappa is, “to create an uncommon and lifelong brotherhood that develops leaders and encourages service to others for the betterment of our communities.” <http://www.pikapp.org/content.aspx?id=162>.

32. That the vision of Pi Kappa is, “a future where every Pi Kappa Phi embraces his role as a leader, puts service before self and improves the world around him”. <http://www.pikapp.org/content.aspx?id=162>.

33. That the student creed values of Pi Kappa are “common loyalty, personal responsibility, achievement, accountability, campus involvement, responsible citizenship, lifelong commitment.” <http://www.pikapp.org/content.aspx?id=162>.

That the creed of Pi Kappa is,

I believe that the ideal chapter is made up of men

Who are bound together in a common loyalty
which transcends any personal selfishness;

Who realize that membership means personal responsibility
in bearing their share of the financial burden
of the chapter and the national organization;

Who bring credit to the fraternity by striving to attain
the highest possible standards of scholarship;

Who safeguard the reputation of their chapter
by keeping careful watch over their personal conduct;

Who uphold faithfully the
traditions and activities of their college;

Who prepare themselves diligently to shoulder their
full responsibility as citizens.

I believe that my chapter can become an ideal chapter,
and I shall do my share to make it so.
<http://www.pikapp.org/content.aspx?id=164>.

34. That at the 53rd Supreme Chapter in 2012, Pi Kappa adopted the following
Statement of Position on Alcohol Abuse:

The Supreme Chapter and the National Council of Pi Kappa Phi Fraternity,
acting out of concern for the safety and well-being of our members,
therefore oppose alcohol abuse by members of the fraternity, regardless of
whether the behavior occurs at a fraternity event.

Pi Kappa Phi defines alcohol abuse as the type of overuse that causes
irresponsible behavior, a dangerous loss of reaction time, physical illness
and damage to personal relationships. This abuse may occur in a solitary
incident or in a chronic behavior pattern.

The fraternity believes alcohol abuse prevents individual members from achieving their full potential as citizens and exemplifying the characteristics of true brotherhood. Consequently, Pi Kappa Phi works to address the negative behaviors associated with alcohol misuse and abuse, and not simply the location of those behaviors.

Through education, training and mature adult guidance, Pi Kappa Phi provides the tools to help students make good choices and to understand the consequences of their choices. The national fraternity will continue to provide information about alcohol abuse, as well as counseling resources, as part of its comprehensive prevention education strategy.

<http://www.pikapp.org/content.aspx?id=169>.

35. That at the 53rd Supreme Chapter in 2012, Pi Kappa adopted the following Statement of Position on Hazing:

The Supreme Chapter and the National Council of Pi Kappa Phi Fraternity unequivocally oppose all acts of hazing. The national fraternity, as well as most universities and states, define hazing as any action taken or situation created, intentionally, whether on or off fraternity premises, to produce mental or physical discomfort, embarrassment, harassment or ridicule, regardless of a person's willingness to participate. While the fraternity's risk management policy provides a list of activities that may constitute hazing, Pi Kappa Phi expects its chapters to provide an atmosphere where all members, associate members and guests feel safe by ensuring respect for human dignity is a chief priority. Additionally, members of the Fraternity are expected to hold each other accountable to our shared standards.

All alleged incidents of hazing will be investigated and adjudicated in accordance with the fraternity's disciplinary code. Any member found in violation of Pi Kappa Phi's hazing policy will be sanctioned in accordance with the code. Such sanctions may include suspension and expulsion from the fraternity.

Members and associate members who are aware of behavior that is inconsistent with this statement or Pi Kappa Phi's hazing policy should contact the fraternity's National Headquarters at (704) 504-0888. <http://www.pikapp.org/content.aspx?id=169>.

36. That at the 53rd Supreme Chapter in 2012, Pi Kappa adopted the following Statement of Position on Risk Management:

Pi Kappa Phi Fraternity's risk management policy (FIPG) shall apply to all fraternity entities and all levels of fraternity membership. The fraternity expects all members to comply with any and all applicable laws of the state, province, county, city and institution of higher education. Pi Kappa Phi

expects that chapter houses meet all local fire and health codes and standards at all times. Additionally, the possession and/or use of firearms, explosives or incendiary devices of any kind shall not be allowed on the premises of the chapter house.

Through education, training and mature adult guidance, Pi Kappa Phi provides the tools to help students make good choices and to understand the consequences of their choices. The fraternity will hold chapters and individual members accountable for the choices they make. <http://www.pikapp.org/content.aspx?id=169>.

37. That at the 53rd Supreme Chapter in 2012, Pi Kappa adopted the following Statement of Position on Substance Abuse:

The Supreme Chapter and the National Council Pi Kappa Phi Fraternity, realizing that substance abuse prevents individual members from achieving their full potential as citizen and exemplifying the characteristics of true brotherhood, oppose substance abuse at all times. Substances are broadly defined as items that, when absorbed into the body, alter normal bodily function. Substances include, but are not limited to, illegal drugs, as well as prescription drugs used in a manner contrary to their instructions or by someone to whom they were not prescribed.

The fraternity believes strongly in the betterment of men through our chapters and has consequently adopted a philosophy statement outlining its approach to illegal drugs and other controlled substances. Pi Kappa Phi also expects members to follow federal and state drug laws across the United States.

Pi Kappa Phi is concerned about the impact drugs and other mind-altering substances have on the safety and lifelong well-being of ours (sic) members, as well as the reputation of the fraternity. Through education, training, and mature adult guidance, Pi Kappa Phi provides the tools to help students make good choices and to understand the consequences of their choices. The national fraternity will continue to incorporate information about substance abuse, as well as counseling resources, into its prevention education initiatives. <http://www.pikapp.org/content.aspx?id=169>.

38. That Pi Kappa has a documented history, which is way too long to exhaustively catalogue in this Complaint, of alcohol abuse, hazing, disorderly conduct, violence, racism, feminism, hosting unapproved events, harassment, physical and verbal abuse, vandalism, and drug use within its chapters. https://en.wikipedia.org/wiki/Pi_Kappa_Phi.

39. That Pi Kappa is a member of the Fraternal Information and Programming Group, Inc. (hereinafter, "FIPG"). "FIPG was organized for the purpose of providing information on risk management issues. The mission is to promote sound risk management policies and practices" and "to be the leading resource of risk management education, programming and information to the broad-based constituency involved in all aspects of Greek Life." <http://www.fipg.org/>.

40. That in November, 2013, in an effort to address the documented history and ongoing problems within its chapters and desiring to preserve its public image, the Pi Kappa National Council adopted The Risk Management Policy of Pi Kappa Phi Fraternity. It mirrored the FIPG Risk Management Policy and applied to all fraternity entities and all levels of fraternity membership. With respect to Alcohol and Drugs, the policy included the following directives:

The possession, sale, use, or consumption of Alcoholic beverages, while on chapter premises, during a fraternity event or any event that an objective observer would associate with the fraternity must comply with the laws of the state, county, city and institution of higher education and comply with the BYOB or third party vender guidelines; No alcoholic beverages may be purchased through or with chapter funds nor may it be purchased for the chapter nor in quantity; no open parties where alcohol is present; no members shall purchase or serve to any minor; the possession, sale or use of any illegal drugs or other controlled substances is strictly prohibited; no chapter may co-sponsor an event with an establishment that provides alcohol for sale; all recruitment or rush activities must be non-alcoholic; no drinking games; no activity that involves duress or encouragement related to the consumption of alcohol; no alcohol shall be present at any member activity or ritual of the chapter. *See Exhibit #1.*

41. That with respect to Hazing, the policy forbids any form of hazing by any chapter, member, student, alumnus or volunteer. *See Exhibit #1.*

42. That with respect to Fighting or Physical Abuse, the policy strictly prohibits any form of fighting or physically abusive behavior while on chapter premises or during a fraternity event or at any event a reasonable observer would associate with the fraternity. *See Exhibit #1.*

43. That with respect to Water Features, the policy prohibited the use of self-constructed pools, bodies of water, slip-and-slides, or anything similar on chapter premises or any event associated with the fraternity. *See Exhibit #1.*

44. That the policy requires all student members and associate members to be instructed on the Risk Management Policy of Pi Kappa annually. *See Exhibit #1.*

45. That, *The Ladder of Risk*, is the presentation of the fraternity's risk management policy "to be delivered by a dynamic facilitator" who shall "educate all chapter members every other year." Justin Angotti, Joslyn McGriff, & Adam Phillips, *The White Diamond: A Guide to Brotherhood*. 160 (2014). This "every other year" requirement directly contradicts the "annual" requirement included in the November 2013 Risk Management Policy.

46. That on April 7-9, 2014, the Alpha Chapter required new recruits to stay at the fraternity house for a week leading up to their initiation, known as "hell week". The potential new members were only allowed to leave to shower or attend class. They could only eat at certain times, their amount of sleep was restricted, and their cell phones were confiscated.

47. That on April 18, 2014, following a brief investigation by Pi Kappa into the violations committed the week prior, the College of Charleston adopted the self-imposed sanctions of Pi Kappa, which included: "Revision of the Associate Member Education Program; Revision of the Written Big Brother Program and Contracts; Hazing Prevention Workshop; Chapter Standards Board Training; Chapter Code of Conduct Updated; Associate Member Education Activity Monitoring by Chapter Advisor." <http://deanofstudents.cofc.edu/organizational-student-conduct/index.php>.

48. That the College of Charleston found the self-imposed sanctions issued by Pi Kappa to be insufficient, thus imposed further sanctions against the Alpha Chapter, including, but not limited to: social probation through September 30, 2014; member attendance at a hazing

prevention workshop; the removal of the Alpha Chapter new member educator; the requirement that one executive board member attend all new member meetings along with the new member educator; a chapter wide service project each semester of 2014, required Pierce to attend all events/meetings during the probation as well as attend the Fall 2014 officer transition workshop. <http://deanofstudents.cofc.edu/organizational-student-conduct/index.php>.

49. That on May 1, 2014, due to the continued violations of Pi Kappa's standards of conduct, National Chancellor James M. Smith informed the Alpha Chapter that a membership review would be conducted by National Headquarters to remediate the chapter. Each member agent of the Alpha Chapter was required to accept certain terms of the review process and waive certain rights afforded them under Supreme Law VIII in order to retain their status as an undergraduate member agent of Pi Kappa. *See Exhibit #2.*

50. That on September 5, 2014, in furtherance of the review process, member agents were required to sign a FERPA release granting Pi Kappa access to each member agent's academic and conduct records, complete the Fraternity's Student Information Questionnaire, complete an interview with a designated member of the National Headquarters staff on September 8, 2014, and agree to and affirm certain conditions outlined in the Alpha Chapter Membership Expectations Agreement, including, but not limited to:

Abide by the Supreme Laws, policies and resolutions of the Supreme Chapter and hold each other accountable to these standards; abide by the College of Charleston policies and regulations governing student, fraternities, and fraternity members; abide by and actively enforce the Pi Kappa Phi Fraternity Risk Management Policy; ensure all members are treated with dignity and respect by actively enforcing the National Fraternity and College's hazing policies; ensure all recruitment and associate member activities remain alcohol-free by not consuming alcohol beforehand and ensuring alcohol is not available to members, potential new members, or associate members prior to, during, or after any of these events or activities; confront any member who violates these standards using both Ultimate Respect and the chapter Standards Board. *See Exhibit # 2.*

51. That on September 22, 2014, Pi Kappa released the results of the Alpha Chapter Membership Review. Of the thirty-six (36) member agents, fifteen (15) remained classified as members of the Alpha Chapter in good standing; eight (8) were suspended until they paid their outstanding financial obligations; three (3) were placed on probation until they graduated or discontinued their course study at the College of Charleston; and ten (10) were placed on Academic Probation and restricted from holding a chapter leadership position, of whom eight (8) were placed on Academic Probation until the conclusion of the Fall semester with the other two (2) being placed on indefinite probation until they became academically eligible. None of the member agents were sanctioned for anything related to their actions of April 7-9, 2014 that triggered the membership review. *See Exhibit # 3.*

52. That following the results, the Alpha Chapter was placed on indefinite probationary status by Pi Kappa, and Director of Prevention Education, Director of Accountability, and Chapter Advisor were charged with actively enforcing, ensuring compliance, and supervising the implementation of the results of the Alpha Chapter Membership Review. The repercussions from their failure to do so was immediate.

53. That at the 2015 Borelli Awards, despite the above, the Alpha Chapter was recognized for the Office of Sustainability Award, Chapter of Achievement Award, and Citizenship & Social Development Award. Further, member agent Trevor Stubbs was named 2015 Greek Scholar of the Year and Defendant Pierce was named Chapter Advisor of the Year.

54. That in February, 2016, the Pi Kappa National Council re-adopted The Risk Management Policy of Pi Kappa Phi Fraternity. It mirrored the FIPG Risk Management Policy and applied to all fraternity entities and all levels of fraternity membership. It was verbatim to the policies adopted in November, 2013. *See Exhibit #4.*

55. That on August 23-24, 2016, less than eleven (11) months post Membership Review and while still on indefinite probation, the Alpha Chapter hosted recruitment events and provided free alcohol to member agents and recruits at the personal residence of Member Agent 4.

56. That on August 29, 2016, the Princeton Review released its list of top party schools, wherein the College of Charleston was ranked 15th. Further, it was ranked 15th in the category of most hard liquor, and 17th for most beer. <https://www.princetonreview.com/college-rankings?rankings=party-schools>.

57. That when Glenn McConnell, (hereinafter, "McConnell"), took over as President of the College of Charleston in 2014, it recognized thirteen (13) fraternities; it currently recognizes only nine (9). On August 30, 2016, McConnell, he himself an alumnus member of the Alpha Chapter, suspended all alcohol-related activities for its fraternities and sororities, citing disruptive parties and excessive drinking among students. In a message to campus community, McConnell stated:

This is not a knee-jerk reaction to an isolated incident, but rather a serious response to a series of dangerous behaviors connected to some members of our fraternities and sororities, ranging from disruptive parties out in the community this month, to recent medical transports related to extreme intoxication. Enough is enough. This type of reckless and dangerous behavior will not be tolerated. While we have a robust and comprehensive education and disciplinary conduct process for drug and alcohol abuse, clearly the message is not getting through to all students.

McConnell consulted with fraternity and sorority leaders before making the decision that the College would "lift the suspension of individual chapters once the Division of Student Affairs had conducted a review of each organization and after each chapter's members had successfully completed additional education and training regarding alcohol and substance abuse, high-risk behavior, and bystander intervention." In closing, McConnell relayed that he had consistently told the chapter members that he'd be their champion, but that he also held chapter members to a higher

standard of civility, integrity and respect than students who were not members of a fraternity chapter. <http://today.cofc.edu/2016/08/30/greek-life-message/>

58. That on or about September 5, 2016, an investigation was initiated by the College of Charleston into the above referenced recruitment events of August 23-24, 2016 held by the Alpha Chapter at the personal residence of Member Agent 4. The findings included the service of alcohol to minors, the hazing of pledges, an above-ground pool filled with water and beer cans, excessive alcohol and drug abuse, multiple violations of Pi Kappa risk management policies, multiple violations of the College of Charleston risk management and event policies, a complete disregard by the Alpha Chapter for decision-making skills, and a finding of the immediate violation of the policies and resolutions of the Supreme Chapter as outlined in the Alpha Chapter Membership Review that was to be implemented by Pi Kappa eleven (11) months earlier.

59. That on November 1, 2016, based on its findings, the College of Charleston imposed further sanctions against the Alpha Chapter, including:

90% chapter participation in a workshop led by the chapter Leadership Consultant on decision-making skills; 90% chapter participation in a meeting specifically called to review the risk management and event policies of the College of Charleston and the Pi Kappa Phi Fraternity; Chapter President will write a letter of apology to the College President, Dean of Students and Director of Fraternity and Sorority Life; a requirement that the 2017 Pi Kapp College for Chapter Officers Chapter will send the required ten (10) delegates from the Alpha Chapter (Archon, Vice Archon, Treasurer, Secretary, Warden, Historian, Chaplain, Risk Management Chairman, Philanthropy Chairman, and Standards Board Chairman) to Pi Kapp College for Chapter Officers in January 2017 and pay all applicable fees, with additional requirements that the chapter's delegates must attend all conference sessions and abide by the Pi Kapp College for Chapter Officers student conduct policies; Beginning January 1, 2017, the Alpha Chapter shall be placed on a suspension of events with alcohol until the conclusion of Spring 2017 Interfraternity Council recruitment (i.e. bid signing day). During this time, the chapter may not host, sponsor, organize, endorse, or plan any events where alcohol is present; beginning August 1, 2017, the Alpha Chapter shall be placed on a suspension of events with alcohol until the conclusion of Fall 2017 Interfraternity Council recruitment (i.e. bid signing day). During this time, the chapter may not host, sponsor, organize, endorse, or plan any events where alcohol is present; Chapter

President and Vice President will organize and execute an alcohol-free event, and a philanthropy event which will benefit *The Ability Experience*.
<http://deanofstudents.cofc.edu/organizational-student-conduct/index.php>.

60. That the *Star & Lamp* is Pi Kappa's official publication, and on November 7, 2016, during its *26 Days of Thanks*, member agent Gary Sugg published a comment wherein he thanked Chapter Advisor for, "his commitment and dedication to our beloved Alpha Chapter. Richard Pierce definitely deserves recognition for his dedication to the rebound of Alpha Chapter", and "has been instrumental in Alpha Chapter's recent improvements. He guides them week by week, sits in on every meeting, event, and chapter and has a great relationship with the chapter members. Richard paints the image of an ideal chapter advisor and is continuing his involvement within Pi Kappa Phi by leading our men by example."

<http://www.starandlamp.com/index.php/features-nav/special-sections/days-of-thanks/item/1437-richard-pierce>.

61. That Pi Kappa issued a Social Media Guide to its chapters "to provide basic social media knowledge to allow chapters from across the country to connect and share their positive fraternity experience with the general public." The Guide contains guidelines "established to protect our members and the image of the fraternity" and requires the content to be "appropriate, contains only public information about the fraternity, and portrays Pi Kappa Phi in a positive light." It warns member agents that, "social media is a very public world, the chapter should be sure that content found on their pages or accounts do not violate any university, Pi Kappa Phi or FIPG policy." Pi Kappa offers Fan pages used to provide for a chapter's "public" presence on Facebook, and Group pages used to communicate within a specific group, which are typically "closed" or "secret." The Guide prohibits the creation of a Facebook page to simply provide the details of a party and prohibits the enabling of photos or videos. *See Exhibit 5.*

62. That the Alpha Chapter created a closed, secret Facebook page to advertise parties, to notify each other as to how much alcohol would be provided by the Chapter, to implement hazing techniques, to establish weight limits for females attending chapter parties, to inform members when to bring controlled substances to overnight hazing retreats, to task members with their respective hazing assignments, to organize sex parties, to remind member agents to protect the chapter and members at all costs, to determine where pledges were to sleep each night, to restrict the number of allowed bathroom breaks by pledges, to notify member agents where hidden drugs are located, to suggest what websites to use to purchase term papers, to promote cheating and academic fraud, and among others, to relay the rules of “hell week”.

63. That during April of 2017, Kim was a former member agent of Alpha Chapter and student at the College of Charleston.

64. That during April of 2017, Chapter Advisor was tasked by Pi Kappa to oversee and supervise all fraternity activities and events of the Alpha Chapter, to include advising its individual member agents. Updated in March 2017, the Chapter Advising Guide instructs Chapter Advisor to:

Advise students on the approach to managing chapter operations and of the potential and perceived risks involved in chapter activities or events. Our goal is to provide students the support and opportunity to make decisions that advance the chapter and empower them to minimize or eliminate risks to an acceptable level.” Further, it charged Pierce to accept the newly defined responsibility to engage in dialogue about chapter operations and risk management with students, empower students to create a safe and productive environment, and respond appropriately to decisions and/or incidents that are not aligned with expectations. *See Exhibit #6.*

65. That during April of 2017, Director of Prevention Education was tasked by Pi Kappa with educating its member agents and prevent the immoral or illegal behavior of the fraternity member agents in addition to delivering *The Risk Ladder* presentation to the Alpha Chapter. Further, Director of Prevention Education served as the main point of contact for

questions related to *The Ability Experience*, the Pi Kappa philanthropy project that allows member chapters in good standing to host chapter events with alcohol. Under the *Who to Contact* page of the National Fraternity website, updated in February 2017, Director of Prevention Education was the direct point of contact for Certificate of Insurance Requests - Events, Counseling Resources, and Social Event Planning Resources. *See Exhibit #7.*

66. That during April of 2017, Director of Accountability charged by Pi Kappa to keep Alpha Chapter eligible as an active chapter on its college campus. Specifically, Director of Accountability was responsible for ensuring that Alpha Chapter member agents maintained the organization's moral standards, refrained from the use of alcohol during fraternity activities or events, were held accountable for their actions, and properly educated on risk management. Director of Accountability was the first employee of Pi Kappa to respond to chapter violations and was the main point of contact between Chapter Advisor, the College of Charleston, Alpha Chapter member agents, and the National Fraternity. Director of Accountability was responsible for implementing and enforcing the 2016 Risk Management Policies adopted by the National Council within the Alpha Chapter. Under the *Who to Contact* page of the National Fraternity website, updated in February 2017, Director of Accountability was the direct point of contact for Minimum Chapter Standards Compliance, Certificate of Insurance Requests – University Requirement, General Insurance Inquires (Non-Billing), *Gold Books*, Chapter Conduct & Sanction Inquiries, Chapter Incident Reporting, Individual Member Expulsions & Resignations, and Sexual Misconduct Incident Reporting. *See Exhibit #7.*

67. That on April 15 – April 16, 2017, Alpha Chapter planned, advertised, promoted, hosted, and financed an open party to celebrate the initiation of its newest member agents, wherein it provided free alcohol to its member agents and any attendees, including minors under the age of 21, at 43 Coming Street, Charleston, South Carolina which is owned by Properties. Further, Alpha

Chapter provided and encouraged the use of illegal drugs, including but not limited to, cocaine, marijuana, and ecstasy, to its member agents and guests.

68. That Plaintiff and a newly initiated member agent of Alpha Chapter got into an argument over a female guest. Out of concern that law enforcement would soon respond to find minors being served with alcohol and the presence of illegal drugs, Plaintiff was forcefully thrown out of the party while member agents threatened to kill him if he ever returned. Soon thereafter, Alpha Chapter posted the following message on its Facebook page to be seen by Plaintiff and others, which read: "I will personally square up with you but that doesn't matter cuz you are gone brother. We will get 80 bros behind us to burry you fucking queer. I will end your god damn life. As well as 80 other ppl who think you are the biggest pussy to step foot on planet earth." See Exhibit #8.

69. That immediately following the verbal and written death threats on Plaintiff, Member Agent 1, Member Agent 2, newly initiated Member Agent 3, and Member Agent 4 were dispatched to the personal residence of Plaintiff with instructions to seek retribution of one of its newly initiated member agents by causing physical harm to Plaintiff. As instructed, they broke into his residence and carried out a brutal assault on Plaintiff. Said assault resulted in damage to Plaintiff's personal property and significant bodily injury, including but not limited to, lacerations to his face, cracked ribs, a closed head injury, loss of consciousness, and extensive bruising all over his body.

70. That immediately following the lynching of Plaintiff, and on the way back to the party, Member Agent 1, Member Agent 2, Member Agent 3, and Member Agent 4 notified fellow member agents that Plaintiff "cried like a little bitch" as they completed their assignment and sought approval and credibility for their actions by bragging about their successful retribution.

71. That Plaintiff contacted the City of Charleston Police Department who responded and found Plaintiff with blood smeared on his chest, a bloody nose, injuries to his head and body, blood covering the inner walls of his apartment, a pool of blood in the bathroom sink, and significant property damage. Plaintiff provided Officer Crapps of the City of Charleston Police Department with the names of the four (4) member agents he believed had assaulted him along with a screenshot of the life-threatening Facebook post made by a member agent. Officer Crapps provided Plaintiff with a case number on a business card and left the scene. *See Exhibit #9.*

72. That Pi Kappa alumnus and attendee of the party, Gunnar Burts (hereinafter "Burts"), overheard member agents bragging about its successful beating of Plaintiff, and contacted Chapter Advisor to inform him of same. Upon returning to the party, Member Agent 2 contacted Chapter Advisor and affirmed the mission was a success. Chapter Advisor believes he was contacted by Member Agent 2 because Member Agent 2 sits on an Alpha Chapter committee that Chapter Advisor personally oversees and advises.

73. That instead of personally checking on the welfare of Plaintiff, notifying law enforcement, notifying college public safety, notifying Director of Prevention Education or Director of Accountability, or implementing the chapter's crisis management plan, Chapter Advisor attempted to contact member agent Nick Bullen (hereinafter "Bullen"), to no avail. Chapter Advisor then contacted member agent Brian Browne (hereinafter "Browne"), and ordered Browne and Bullen to respond to Plaintiff's residence to make sure he didn't alert law enforcement or seek medical treatment. Upon arriving at Plaintiff's residence, Browne advised Chapter Advisor of the blood on the counter, walls and bathroom, and that the doors to the laundry area were off their hinges and leaning on the washer and dryer. Bullen advised Chapter Advisor that it was clear that a violent beating of Plaintiff had taken place, and that Plaintiff was begging to be taken to the

hospital due to his immense pain in his head, body, and blood all over his face and stomach. Chapter Advisor instructed Bullen and Browne to take Plaintiff anywhere but the hospital.

74. That Bullen and Browne placed Plaintiff in their car, and as instructed by Chapter Advisor, refused Plaintiff's request to be taken to the hospital and instead drove him to the house of member agent Greg Rothman (hereinafter "Rothman"). At Rothman's house was Eric Rinklin, a former member agent who was on vacation from New York. They provided ice to Plaintiff for his injuries while Rothman prepared pasta for the group.

75. That Chapter Advisor, acting on behalf of Pi Kappa and the Alpha Chapter, once again contacted Browne to ensure his prior instructions had been adhered to. Chapter Advisor asked to speak to Plaintiff, and Browne placed the call on speakerphone. During the call, Chapter Advisor strongly discouraged Plaintiff from seeking treatment for his injuries, and further, encouraged Plaintiff to forego pressing criminal charges against Member Agent 1, Member Agent 2, Member Agent 3, and Member Agent 4. At all times, the only concern of Chapter Advisor was to protect the interests and image of Pi Kappa, the Alpha Chapter, and its member agents.

76. That Plaintiff again requested to be driven to the hospital, but Browne instead drove Plaintiff back to his personal residence, and escorted Plaintiff inside until he was sure that Plaintiff would not seek medical treatment or call law enforcement.

77. That once Browne left and he was finally away from member agents of Alpha Chapter, Plaintiff called an Uber for a ride to the Medical University of South Carolina (hereinafter "MUSC") where he was treated for his injuries, which included a concussion, broken ribs, body contusions, and lacerations to his face, neck and body area.

78. That Plaintiff notified the City of Charleston Police Department of his visit to MUSC and provided the Department with pictures of his injuries.

79. That on or about April 17, 2017, the City of Charleston Police Department contacted Chapter Advisor, who informed the Department that an investigation of the matter was unnecessary due to the in-house judicial procedures at the College of Charleston, and further, reached an understanding with the Department that Pi Kappa would handle the matter in-house.

80. That Plaintiff was referred to by member agents to campus students as a “fucking queer”, “the biggest pussy to step foot on planet earth”, “a rat”, and “a little bitch” for going to the hospital and communicating with law enforcement, exposing him to public hatred, ridicule, shame, and causing him to be shunned and avoided by other member agents and campus students.

81. That on or about April 19, 2017, Plaintiff contacted the City of Charleston Police Department requesting assistance from its Office of Victims’ Advocates due to his fear of staying at his current residence. He was advised that the matter was not being handled by the City of Charleston, and was referred to the College of Charleston Victim Services for emergency housing.

82. That on or about April 20, 2017, Chapter Advisor finally notified Pi Kappa of the beating of Plaintiff by member agents of the Alpha Chapter, and was immediately tasked by Pi Kappa to complete an internal review of the matter for the national organization. As of the date of the filing of this Complaint, Chapter Advisor has yet to conclude said review. Throughout the course of his ongoing internal review, Chapter Advisor has yet to speak additionally with Plaintiff or meet with him in person.

83. That on or about April 27, 2017, the *Star & Lamp*, shined its *Volunteer Spotlight* on Chapter Advisor, who stated, “I believe in the values and ideals of Pi Kappa Phi, and being able to share this with the men of Alpha is important.” The two life lessons he tries to teach to chapter member agents are, “be smart and do the right thing and build relationships.” In the article’s cover picture, Chapter Advisor is shown next to Member Agent 2 and Member Agent 4.

<http://www.starandlamp.com/index.php/features-nav/special-sections/volunteer-appreciation/item/3023-volunteer-spotlight-richard-pierce>.

84. That on May 3, 2017, the understanding reached between Chapter Advisor and the City of Charleston Police Department came to fruition, as the Department notified Plaintiff that it would not be prosecuting the matter and classified the case as Pending Inactive.

85. That on or about May 10, 2017, out of concern for his safety and ongoing public hatred, ridicule, and shame, Plaintiff withdrew as a student from the College of Charleston and fled to New Jersey.

86. That on or about May 17, 2017, Joey Ferrelli, acting as the Archon (President) of the Alpha Chapter, informed the member agents through its closed secret Facebook page that:

Sometime this week, the Post and Courier will be posting an article about our assault incident a few weeks ago. I have been informed to warn u all that it will be coming out, and also to not talk to and reporters/investigators. Headquarters and the school are aware of the situation and will tell us what steps to take. Everything will be fine. As Richard says, continue to be smart and do the right thing. *See Exhibit #10.*

87. That Plaintiff is informed and believes that Chapter Advisor, Director of Prevention Education, Director of Accountability, and Pi Kappa entities will attempt to throw its member agents to the wolves and assert and allege that they are not responsible for the harm caused to Plaintiff by the individual acts of Member Agent 1, Member Agent 2, Member Agent 3, and Member Agent 4. To do so would be contrary to the well-settled law of principal-agency, the doctrine of *respondeat superior*, the failure to understand the proximate cause of Plaintiff's injuries, and proof certain of its mandate to protect the interests and image of its chapter at all costs.

88. That Plaintiff is informed and believes that Chapter Advisor, the other individually-named Defendants, and the Pi Kappa entities will assert and allege that Plaintiff has not been

harmed by the acts described above or that Plaintiff “had it coming to him” and “his injuries are not that bad.”

89. That fortunately for Plaintiff, he has a right to have a jury of his peers determine the level of harm and damage that he has suffered and endured.

90. That as a direct and proximate result of the above-referenced acts of the Defendants, and as alleged herein, Plaintiff sought medical and psychological treatment, suffered and continues to suffer irreparable mental and emotional harm that has caused, and in the future will cause, him to suffer one or more of the following elements of damage:

- a. physical pain and suffering;
- b. mental anguish;
- c. emotional distress;
- d. impairment of health and bodily efficiency;
- e. loss of sleep and inability to concentrate;
- f. loss of the Plaintiff’s enjoyment of life;
- g. shock and injury to Plaintiff’s nerves and nervous system;
- h. increased susceptibility to future injury;
- i. substantial expenses for medical and psychological services;
- k. future medical care; and
- l. any and all other damages provable at the trial of this case.

FOR A FIRST CAUSE OF ACTION
(Negligent Hiring Against Defendant Pi Kappa)

91. Plaintiff reincorporates and realleges all preceding paragraphs as if fully set forth herein.

92. At all relevant times, Defendant owed Plaintiff a duty of care in that of which a reasonable person would have used under the circumstances then and there prevailing.

93. Defendant specifically owed Plaintiff a duty of care to not subject him to hazing, death threats and physical injury by any member agent of Defendant.

94. Defendant owed a duty not to negligently hire individuals generally and not to negligently hire employees who would ignore their responsibilities under the facts set forth herein.

95. At the time of the hiring of Director of Prevention Education and Director of Accountability, Defendant knew or should have known that their employment would create an undue risk of harm to its member agents if they ignored their responsibilities under the facts set forth herein.

96. The harm to Plaintiff was or should have been anticipated by Defendant upon the hiring of Director of Prevention Education and Director of Accountability and was foreseeable.

97. Director of Prevention Education did not have the requisite experience or knowledge to be employed as the Director of Prevention Education and charged with developing and managing the menu of programs and initiatives intended to prevent and address the negative behaviors associated with alcohol and drug abuse, hazing, sexual abuse and harassment for all chapters of Pi Kappa, including the Alpha Chapter located in Charleston County, South Carolina, nor the requisite experience or knowledge to educate and prevent the immoral or illegal behavior of the fraternity or its member agents.

98. Director of Accountability did not have the requisite experience or knowledge to be employed as the Assistant Executive Director of Education and Accountability charged with the development and execution of the Alpha Chapter's education and assessment strategy, including leadership development programs, officer and key committee chairman resources, member education, chapter advisor training and resources, and prevention education, nor the requisite experience or knowledge to oversee the implementation of the Alpha Chapter's risk management policies and individual member and Alpha Chapter conduct processes.

99. Despite the actual and/or constructive knowledge of Defendant that Director of Prevention Education and Director of Accountability lacked this requisite experience or knowledge, the Defendant hired them and bestowed upon them these duties.

100. The multiple harms and injuries suffered by Plaintiff were the direct, foreseeable, and proximate result of the negligent, grossly negligent, reckless, and willful and wanton hiring of Director of Prevention Education and Director of Accountability by Defendant.

101. Due to the willful, wanton, reckless, grossly negligent, and negligent acts of the Defendant, Plaintiff is entitled to recover actual and punitive damages as determined by a jury.

FOR A SECOND CAUSE OF ACTION
(Negligent Retention Against Defendant Pi Kappa)

102. Plaintiff reincorporates and realleges all preceding paragraphs as if fully set forth herein.

103. At all relevant times, Defendant owed Plaintiff a duty of care in that of which a reasonable person would have used under the circumstances then and there prevailing.

104. Defendant specifically owed Plaintiff a duty of care to not subject him to hazing, death threats, and physical injury.

105. Defendant had an ongoing duty to ensure that its employees were competent and effectively discharged their respective duties.

106. Defendant also had a duty imposed by the standard of care adopted and enacted by the internal risk management policies of Pi Kappa as set forth above.

107. Defendant breached these duties by negligently retaining employees who failed to discharge their duties in a competent and effective manner.

108. The Defendant had actual and constructive knowledge that members of Alpha Chapter had a proclivity and propensity for violence and reckless behavior leading up to the Plaintiff's injuries.

109. The facts of this case have a substantial nexus to the previous sanctions against Alpha Chapter for similarly related incidents.

110. Despite this actual knowledge, the Defendant continued to employ Director of Prevention Education and Director of Accountability and had actual knowledge of their failure to implement, enforce, and ensure proper compliance with any of the measures set forth under the Defendant's own internal risk management policy.

111. The negligent and careless, and willful, wanton, reckless, and grossly negligent acts/omissions of the Defendant was the direct, foreseeable, and proximate cause of Plaintiff's multiple personal injuries and damages described herein.

112. Due to the willful, wanton, reckless, and grossly negligent acts/omissions of the Defendant, Plaintiff is entitled to recover actual and punitive damages as determined by a jury.

FOR A THIRD CAUSE OF ACTION
(Negligent Supervision Against Defendant Pi Kappa)

113. Plaintiff reincorporates and realleges all preceding paragraphs as if fully set forth herein.

114. Defendant owed a duty to Plaintiff not to negligently supervise its employees, agents, and members.

115. Defendant knew or should have known that allowing Director of Prevention Education, Director of Accountability, and Chapter Advisor to supervise the member agents of Alpha Chapter created an undue risk of harm to others, including Plaintiff, based on the repeated acts of hazing, violence, and alcohol and drug abuse within the chapter throughout the course of their employment and agency.

116. The negligent and careless, and willful, wanton, reckless, and grossly negligent acts/omissions of the Defendant was the direct, foreseeable, and proximate cause of Plaintiff's multiple personal injuries and damages described herein.

117. Due to the willful, wanton, reckless, and grossly negligent acts/omissions of the Defendant, Plaintiff is entitled to recover actual and punitive damages as determined by a jury.

FOR A FOURTH CAUSE OF ACTION
(Negligent Supervision Against Defendants Pi Kappa, Alpha Chapter,
Chapter Advisor, Director of Prevention Education and Director of Accountability)

118. Plaintiff reincorporates and realleges all preceding paragraphs as if fully set forth herein.

119. Defendants Pi Kappa, Alpha Chapter, Director of Prevention Education, and Director of Accountability owed a duty to Plaintiff not to negligently supervise Chapter Advisor.

120. Defendants Pi Kappa, Alpha Chapter, Director of Prevention Education, and Director of Accountability knew or should have known that breaching its duty to supervise Chapter Advisor created an undue risk of harm to others, including Plaintiff, based on the repeated acts of hazing, violence, and alcohol and drug abuse within the chapter throughout the course of his agency.

121. Defendants owed a duty to Plaintiff not to negligently supervise its member agents of Alpha Chapter.

122. Defendants knew or should have known that breaching its duty to supervise its member agents created an undue risk of harm to others, including Plaintiff, based on the repeated acts of hazing, violence, and alcohol and drug abuse within the chapter throughout the course of their supervision.

123. Defendant breached this duty in a grossly negligent manner, by specifically:

- a) failing to adequately investigate member agents' background/history;
- b) failing to adequately investigate member agents' propensity for violence;
- c) failing to warn plaintiff of the imminent threat to his safety upon having actual and constructive notice of the member agents' intent to cause him physical harm;

- d) failing to adequately educate member agents;
- e) failing to adequately discipline member agents for prior similar conduct;
- f) failing to adequately implement and enforce risk management;
- g) failing to adequately implement alcohol education;
- h) failing to ensure that only member agents over the age of 21 were served alcohol;
- i) failing to ensure that member agents and guests were not overserved;
- j) failing to prohibit member agents from using controlled substances;
- k) failing to prevent the initial altercation between plaintiff and member agents’;
- l) failing to prevent member agents’ from making direct threats to plaintiff’s life;
- m) failing to prevent member agents’ from savagely assaulting plaintiff;

124. The negligent and careless, and willful, wanton, reckless, and grossly negligent acts/omissions of the Defendants was the direct, foreseeable, and proximate cause of Plaintiff’s multiple personal injuries and damages described herein.

125. Due to the willful, wanton, reckless, and grossly negligent acts/omissions of the Defendants, Plaintiff is entitled to recover actual and punitive damages as determined by a jury.

FOR A FIFTH CAUSE OF ACTION
(Negligence/Gross Negligence Against All Defendants)

126. Plaintiff reincorporates and realleges all preceding paragraphs as if fully set forth herein.

127. Defendants owed a duty to control the conduct of its member agents and to warn Plaintiff of the potential for danger or harm.

128. Because plaintiff was entrusted to the care, custody, and control of them, each Defendant, including the individually-named Defendants, had a special relationship to plaintiff.

129. Because Defendants Pi Kappa, Alpha Chapter, Chapter Advisor, Director of Prevention Education, and Director of Accountability had the right and duty to invite them to be

member agents of the Alpha Chapter, Defendants had a special relationship to Member Agent 1, Member Agent 2, Member Agent 3, and Member Agent 4, the injurers.

130. Through that special relationship, Defendants were vicariously liable for all acts/or omissions committed by the injurers.

131. Under the doctrine of *respondeat superior*, Defendants are responsible and liable for all acts and/or omissions committed by the injurers.

132. The Defendants knew or should have known of the repeated violent acts of their member agents, thus they are liable for the direct and foreseeable conduct of the injurers.

133. As fully set out above, Defendants failed to perform and breached their duties to Plaintiff.

134. As a direct and proximate cause of the breach of their duties, plaintiff suffered multiple personal injuries as set forth herein.

135. Due to the willful, wanton, reckless, and grossly negligent acts/omissions of the Defendants, Plaintiff is entitled to recover actual and punitive damages as determined by a jury.

FOR A SIXTH CAUSE OF ACTION
(Negligence/Gross Negligence Against All Defendants)

136. Plaintiff reincorporates and realleges all preceding paragraphs as if fully set forth herein.

137. At all times relevant to this Complaint, Defendants owed a duty to provide a safe and harm free environment to its guests.

138. Defendants knew or should have known of the repeated hazing, alcohol and drug abuse, and violent tendencies of its member agents, yet failed to provide a safe environment for Plaintiff, thus they are liable for the direct and foreseeable conduct of the member agents.

139. The failure to provide the safe and harm free environment directly, proximately and foreseeably caused the injuries and harm to Plaintiff described more fully above.

140. Due to the willful, wanton, reckless, and grossly negligent acts/omissions of the Defendants, Plaintiff is entitled to recover actual and punitive damages as determined by a jury.

FOR A SEVENTH CAUSE OF ACTION
(Negligence/Gross Negligence Against All Defendants)

141. Plaintiff reincorporates and realleges all preceding paragraphs as if fully set forth herein.

142. Pi Kappa by and through its management, employment, and agency of Defendants had a duty and responsibility to make sure that the policies and procedures enacted, including *Ladder of Risk*, are real and they are enforced.

143. Because Defendants systematically and continuously ignored the policies and procedures enacted as the standard of care within Pi Kappa, those policies and procedures effectively did not exist.

144. The systematic and continual violations of these purported policies and procedures directly, proximately and foreseeably caused the harms and injuries suffered by Plaintiff described more fully above.

145. Due to the willful, wanton, reckless, and grossly negligent acts/omissions of the Defendants, Plaintiff is entitled to recover actual and punitive damages as determined by a jury.

FOR AN EIGHTH CAUSE OF ACTION
(Negligence/Gross Negligence S.C. Code Ann. § 33-56-180(A)
Against the Individually Named Defendants)

146. Plaintiff reincorporates and realleges all preceding paragraphs as if fully set forth herein.

147. By ignoring and failing to implement and enforce the policies and procedures enacted as the standard of care within Pi Kappa, by failing to warn Plaintiff of the known hazing, alcohol and drug abuse and violent tendencies of its member agents, by failing to provide a harm free and safe environment to Plaintiff, and by other particulars to be developed at the trial of this

case demonstrating gross negligence, recklessness, and willful and wanton conduct, the above named Defendants are not subject to the protection afforded pursuant to S.C. Code Ann. § 33-56-180.

148. Because of the herein-described grievous behavior, the individual Defendants are not subject to the limitations and protections of S.C. Code Ann. § 33-56-180.

149. Because the individually-named Defendants were the agents and employees of Pi Kappa, the organization is responsible and liable for their conduct.

150. Due to the willful, wanton, reckless, and grossly negligent acts/omissions of the Defendants, Plaintiff is entitled to recover actual and punitive damages as determined by a jury.

FOR A NINTH CAUSE OF ACTION
(Assault and Battery Against All Defendants)

151. Plaintiff reincorporates and realleges all preceding paragraphs as if fully set forth herein.

152. Acting on behalf of Pi Kappa, Defendants made threats on Plaintiff's life as he left the party, and immediately following via social media which put him in immediate fear of his life.

153. Defendants had reason to know that Plaintiff would be peculiarly susceptible to fear after being involved in an altercation with one of its newly initiated member agent's, and took advantage of that fact.

154. That the proximate cause of Plaintiff's injuries was the infliction of forcible, unwanted contact to Plaintiff's person by Member Agent 1, Member Agent 2, Member Agent 3, and Member Agent 4, in effect, acting as lynch mob for Pi Kappa by carrying out the aforementioned verbal and written threats.

155. The multiple harms and injuries suffered by Plaintiff were the direct, foreseeable, and proximate result of the custom and culture created within the Alpha Chapter by Pi Kappa.

156. Due to the willful, wanton, reckless, and grossly negligent acts/omissions of the Defendants, Plaintiff is entitled to recover actual and punitive damages as determined by a jury.

FOR A TENTH CAUSE OF ACTION
(Dram Shop Liability Against All Defendants)

157. Plaintiff reincorporates and realleges all preceding paragraphs as if fully set forth herein.

158. Defendants owed a duty of care and protection to not provide its member agents and guests, including minors, with drugs and alcohol.

159. Defendants owed a duty of care and protection to not provide and allow its member agents and guests, including minors, from consuming copious amounts of drugs and alcohol.

160. The Defendants breached that duty in a grossly negligent manner by:

- a) allowing members of Pi Kappa to purchase alcohol for its member agents and guests, including minors;
- b) allowing its member agents and guests, including minors, to continuously consume alcohol and other illicit drugs despite visible inebriation; and
- c) allowing its member agents and guests, including minors, to leave the premises after consuming copious amounts of drugs and alcohol.

161. The negligent and careless, and willful, wanton, reckless, and grossly negligent acts/omissions of the Defendant was the direct, foreseeable, and proximate cause of Plaintiff's multiple personal injuries and damages described herein.

162. Due to the willful, wanton, reckless, and grossly negligent acts/omissions of the Defendant, Plaintiff is entitled to recover actual and punitive damages as determined by a jury.

FOR AN ELEVENTH CAUSE OF ACTION
(Civil Conspiracy Against All Defendants)

163. Plaintiff reincorporates and realleges all preceding paragraphs as if fully set forth herein.

164. Acting as agents of Alpha Chapter, Defendants conspired together to seek retribution for their newly initiated member agent by agreeing to cause physical harm to Plaintiff.

165. The conspiracy among the member agents was the direct, foreseeable, and proximate cause of Plaintiff's multiple personal injuries and damages described herein.

166. Following the lynching of Plaintiff, Defendants conspired to protect the interests and image of Pi Kappa by forcefully discouraging and preventing Plaintiff from seeking immediate medical treatment and having contact with law enforcement.

167. The nature of the acts described above, the relationship of the parties, the interests of the conspirators, and by other such particulars to be developed at the trial of this case, show an inference of conspiracy.

168. The initial phone call from Chapter Advisor to Bullen and Browne instructing them to discourage and prevent Plaintiff from seeking immediate medical attention, which they successfully did, along with the subsequent phone call from Chapter Advisor directly to Plaintiff through Brown show a common design of the conspirators and actual conspiracy.

169. Defendants conspiracy to protect the fraternity at all cost even at the expense of Plaintiff's health and welfare shows the culture and custom created within Pi Kappa by its officers, employees, and member agents.

170. That as a result of the aforesaid conspiracy, Plaintiff was prevented from seeking immediate medical attention and thwarted from seeking justice through any judicial or administrative proceedings.

171. Due to the conspiracy of the Defendants, Plaintiff is entitled to recover actual and punitive damages as determined by a jury.

FOR A TWELTH CAUSE OF ACTION
(Intentional Infliction of Emotional Distress/Outrage
Against all Defendants)

172. Plaintiff reincorporates and realleges all preceding paragraphs as if fully set forth herein.

173. Defendants formation of a lynch mob against Plaintiff, threats to take Plaintiff's life, overt acts to prevent Plaintiff from seeking immediate medical treatment, and subsequent conspiracy to protect their own interests and image by shaming him into staying quiet resulted in the delay of Plaintiff's necessary medical treatment, seeking out alternate housing assistance, withdrawal from college, relocation to New Jersey, and ongoing mental health counseling.

174. The Defendants conduct was so extreme and outrageous that it exceeded all possible bounds of decency and must be regarded as atrocious and utterly intolerable in a civilized community. Defendants operated the Alpha Chapter as if Chapter Advisor was Tony Soprano and its member agents were made men. They did anything and everything to protect their own interests and image, including threatening to kill one of its former members with the apparent ability to do so.

175. Once a hit has been taken out on a former member agent of the Alpha Chapter, no reasonable person can be expected to endure the severe emotional distress it causes.

176. Due to the acts of the Defendants, Plaintiff suffered injuries and is entitled to recover actual and punitive damages as determined by a jury.

FOR A THIRTEENTH CAUSE OF ACTION
(False Imprisonment Against all Defendants)

177. Plaintiff reincorporates and realleges all preceding paragraphs as if fully set forth herein.

178. Member agents were instructed by Defendants to ignore Plaintiff's immediate and subsequent request to seek medical treatment for his injuries and discouraged and prevented him from doing so.

179. Member agents were instructed by Defendants to drive Plaintiff to the home of another member agent and keep him confined there to delay any medical treatment and further communication with law enforcement.

180. Member agents were instructed by Defendants not to allow Plaintiff to leave on his own accord.

181. Member agents were instructed by Defendants to drive Plaintiff directly back to his personal residence and escort him inside to ensure he didn't seek medical treatment or have any further communication with law enforcement.

182. Defendants restraint of Plaintiff was unlawful, not consented to by Plaintiff, unauthorized by anyone other than Defendants and done only to protect the interests and image of the Defendants.

183. Due to the acts of the Defendants, Plaintiff suffered injuries and is entitled to recover actual and punitive damages as determined by a jury.

FOR A FOURTEENTH CAUSE OF ACTION
(Defamation Against all Defendants)

184. Plaintiff reincorporates and realleges all preceding paragraphs as if fully set forth herein.

185. Plaintiff was referred to as a "fucking queer" and "the biggest pussy to step foot on planet earth" by a member agent on Facebook and seen by other member agents and all others who had access to the site.

186. Following the savage beating of Plaintiff, member agents called him "a rat" and "little bitch" for going to the hospital and communicating with law enforcement.

187. These statements were communicated to other member agents and campus students to expose him to public hatred, ridicule, shame, and cause him to be shunned and avoided by other member agents and campus students.

189. As a result of these communications, Plaintiff withdrew from school, moved out of state, and suffered injuries and is entitled to recover actual and punitive damages as determined by a jury.

WHEREFORE, Plaintiff prays for a trial by jury and for the following:

- i. Judgment against the Defendants, individually and as joint tortfeasors, including their joint and several liability;
- ii. For actual, special, and punitive damages in the amount to be determined by the jury;
- iii. For the costs of this action; and
- iv. For all other and further relief as this court deems just and proper.

THE PEPPER LAW FIRM, PA



Mark A. Peper, Esq.
Julian A. Ferguson, Esq.
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Charleston, South Carolina 29407
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Julian@peperlawfirm.com

This 1 day of August, 2017
Charleston, South Carolina

PI KAPPA PHI FRATERNITY RISK MANAGEMENT POLICY AS ADOPTED NOVEMBER 2013

The Risk Management Policy of Pi Kappa Phi Fraternity, adopted by the National Council pursuant to Article IV of the Constitution, mirrors the FIPG, Inc. Risk Management Policy, includes the following provisions, and applies to all fraternity entities and all levels of fraternity membership.

ALCOHOL AND DRUGS

1. The possession, sale, use, or consumption of ALCOHOLIC BEVERAGES, while on chapter premises or during a fraternity event, in any situation sponsored or endorsed by the chapter, or at any event a reasonable, objective observer would associate with the fraternity, must be in compliance with any and all applicable laws of the state, province, county, city, and institution of higher education and must comply with either the BYOB or third party vendor guidelines.
2. No alcoholic beverages may be purchased through or with chapter funds nor may the purchase of same for members or guests be undertaken or coordinated by any member in the name of or on behalf of the chapter. The purchase or use of a bulk quantity or common source(s) of alcoholic beverage, including but not limited to kegs or cases, is prohibited.
3. OPEN PARTIES, meaning those with unrestricted access by non-members of the fraternity without specific invitation, where alcohol is present, are prohibited.
4. No members, collectively or individually, shall purchase for, serve to, or sell alcoholic beverages to any minor (i.e. those under legal drinking age).
5. The possession, sale, or use of any ILLEGAL DRUGS or OTHER CONTROLLED SUBSTANCES while on chapter premises or during a fraternity event or at any event that a reasonable, objective observer would associate with the fraternity is strictly prohibited.
6. No chapter may co-sponsor an event with an alcohol distributor or tavern (tavern defined as an establishment generating more than half of annual gross sales from alcohol) at which alcohol is given away, sold, or otherwise provided to those present. This includes any event held in, at, or on the property of a tavern as defined above for purposes of fundraising. However, a chapter may rent or use a room or area in a tavern as defined above for a closed event held within the provisions of this policy, including the use of a third party vendor and guest list. An event at which alcohol is present may be conducted or co-sponsored with a charitable organization if the event is held within the provisions of this policy.
7. No chapter may co-sponsor, co-finance, attend, or participate in a function at which alcohol is purchased by any of the host chapters, groups, or organizations.
8. All recruitment or rush activities associated with any chapter will be non-alcoholic. No recruitment or rush activities associated with any chapter may be held at or in conjunction with a tavern or alcohol distributor as defined in this policy.
9. No member or associate member shall permit, tolerate, encourage, or participate in "drinking games." The definition of drinking games includes but is not limited to the consumption of shots of alcohol, liquor, or alcoholic beverages; the practice of consuming shots equating to one's age; "beer pong;" "century club;" "dares;" or any other activity involving the consumption of alcohol that involves duress or encouragement related to the consumption of alcohol.
10. No alcohol shall be present at any associate member activity or ritual of the chapter. This includes but is not limited to activities associated with "bid night," "Big Brother - Little Brother" events or activities, "family" events or activities, and initiation.



HAZING

No chapter, associate chapter, student, alumnus, or volunteer shall conduct nor condone hazing activities. Permission or approval by a person being hazed is not a defense. Hazing activities are defined as:

"Any action taken or situation created, intentionally, whether on or off fraternity premises, to produce mental or physical discomfort, embarrassment, harassment, or ridicule. Such activities may include but are not limited to the following: use of alcohol; paddling in any form; creation of excessive fatigue; physical and psychological shocks, quests, treasure hunts, scavenger hunts, road trips, or any other such activities carried on outside or inside of the confines of the chapter house; wearing of public apparel that is conspicuous and not normally in good taste; engaging in public stunts and buffoonery; morally degrading or humiliating games and activities; and any other activities that are not consistent with academic achievement; fraternal law, ritual, or policy; the regulations and policies of the educational institution; or applicable state law."

SEXUAL ABUSE AND HARASSMENT

The fraternity will not tolerate or condone any form of sexist or sexually abusive behavior on the part of its members, whether physical, mental, or emotional. This is to include any actions, activities, or events, whether on chapter premises or an off-site location, that are demeaning to women or men, including but not limited to verbal harassment and sexual assault by individuals or members acting together. The employment or use of strippers, exotic dancers, or similar, whether professional or amateur, at a fraternity event as defined in this policy is prohibited.

FIGHTING AND PHYSICAL ABUSE

The fraternity will not tolerate or condone any form of fighting or physically abusive behavior while on chapter premises or during a fraternity event, in any situation sponsored or endorsed by the chapter, or at any event a reasonable observer would associate with the fraternity.

FIRE, HEALTH, AND SAFETY

1. All chapter houses should meet all local fire and health codes and standards.
2. All chapters should post by common phones and in other locations emergency numbers for fire, police, and ambulance and should have posted evacuation routes on the back of the door of each sleeping room.
3. All chapters should comply with engineering recommendations as reported by the insurance company or municipal authorities.
4. The possession and/or use of firearms or explosive or incendiary devices of any kind within the confines and premises of the chapter house is prohibited.
5. Candles should not be used in chapter houses or individual rooms except under controlled circumstances such as initiation.

WATER FEATURES

The use of self-constructed pools, bodies of water, slip-and-slides, or similar on chapter premises or at any event a reasonable observer would associate with the fraternity is prohibited.

EDUCATION

All student members and associate members shall be instructed on the Risk Management Policy of Pi Kappa Phi Fraternity annually. A copy of the Risk Management Policy is also available on the Fraternity's website.



PI KAPPA PHI

MEMORANDUM

TO: Initiated Members of the Alpha Chapter (College of Charleston)

CC: James M. Smith, National Chancellor
Mark E. Timmes, Chief Executive Officer
Christian Wiggins, Chief Operating Officer
Chris Conner, Assistant Executive Director of Chapter Development
Scott Leighty, Director of Chapter Development
Trae Hestness, Leadership Consultant
Richard Pierce, Chapter Advisor

FROM: Justin Angotti, Assistant Executive Director of Education & Accountability

DATE: September 5, 2014

SUBJECT: Overview of the Alpha Chapter Membership Review Process

Pursuant to chapter's sanctions outlined in the decision letter from National Chancellor James M. Smith dated May 1, 2014, the National Headquarters staff will conduct a membership review at the Alpha Chapter in accordance with the procedures outlined in this memorandum.

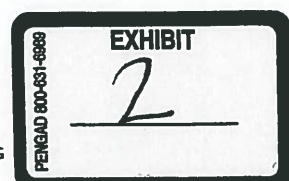
In order to be eligible to retain undergraduate student status in Pi Kappa Phi, an individual must:

1. Sign a copy of the College's Authorization and Consent to Release Education Records form, permitting the National Headquarters staff to review his College academic and conduct records, which would otherwise be protected under the Family Educational Rights and Privacy Act (FERPA);
2. Sign a copy of the Fraternity's Membership Review Acknowledgement and Agreement form;
3. Complete the Fraternity's Student Information Questionnaire;
4. Agree to and affirm the conditions outlined in the Alpha Chapter Membership Expectations Agreement; and
5. Complete an interview with a designated member of the National Headquarters staff.

Interviews with individuals wishing to retain undergraduate student status will be conducted on September 8, 2014 by the following staff members: Justin Angotti, Assistant Executive Director of Education & Accountability; Chris Conner, Assistant Executive Director of Chapter Development; Nick Atzenbeck, Director of Chapter Development; and Ryan Lugabihl, Director of Chapter Operations. During the individual meetings, the interviewers will seek to understand each individual's role in the organization and interest in furthering the mission, vision, values, and standards of Pi Kappa Phi at the College of Charleston. Only those individuals wishing to retain undergraduate student status will be interviewed.

Upon completion of all interviews, the interviewers will make a determination on the status of each member based on all available information, including any supporting documentation submitted by the individuals wishing to retain undergraduate student status. Supporting documentation must be e-

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mailed to Director of Chapter Operations Ryan Lugabihl (rlugabihl@pikapp.org) no later than 5:00pm (EDT) on September 7, 2014.

Any individuals who do not wish to remain classified as an undergraduate member of the Fraternity, as well as any individuals reclassified as part of the membership review, shall be placed on disciplinary alumni status. This reclassification will preserve their membership in the Fraternity, but **preclude them from any involvement in the operations or activities of an undergraduate chapter for a period of no less than four (4) years.** This includes, but is not limited to, participation in rituals, social events, intramural, brotherhood and associate member activities; contact with the chapter property, outside of the execution of a valid lease agreement; and attendance at any event hosted by an undergraduate chapter.

Initiated members may be reclassified to disciplinary alumni status for the following reasons:

- Failure to complete any of the requirements for retaining undergraduate student status outlined above;
- Outstanding financial obligations more than 30 days past due;
- Conduct that is inconsistent with Pi Kappa Phi's Constitution, Supreme Laws, Ritual of Initiation, and/or resolutions and policies of the Supreme Chapter;
- Involvement in a hazing incident;
- Involvement in an incident of sexual misconduct;
- Involvement in an incident involving the violation of applicable policies and/or laws governing the use, sale, and/or possession of alcohol or other controlled substances;
- Determination that the individual is "high-risk" and his participation is not in the best interest of the Fraternity; and/or
- Failure of the individual to demonstrate congruence with Pi Kappa Phi's standards and values resulting in a determination that his continued participation is not in the best interest of the Fraternity.

Notwithstanding the above stated criteria:

- Any individual whose term or cumulative grade point average does not meet the minimum academic standards set forth in Supreme Law (i.e. a GPA at or above the all-men's average on campus or a GPA of 2.55 or better on a 4.00 scale or an equivalent grade point index), shall be placed on academic probation until at least the conclusion of the Fall 2014 semester. At the end of the probationary period, any member who has failed to meet the outlined academic standards may be automatically reclassified to disciplinary alumni status. Individuals who have met the minimum academic standards by the end of the probationary period shall be considered members in good standing and subject to the requirements outlined in the Alpha Chapter's constitution, bylaws, and scholarship program.

The final results of the membership review will be released by the National Headquarters **no later than September 15, 2014**, provided each member's academic and conduct records have been received from the College.

COLLEGE OF CHARLESTON
AUTHORIZATION AND CONSENT TO RELEASE EDUCATION RECORDS

In accordance with the *Family Educational Rights and Privacy Act of 1974 (FERPA)*, as amended, a student's education records are maintained as confidential by the College of Charleston and, except for a limited number of special circumstances listed in that law, will not be released to a third party without the student's prior written consent. A student may grant permission to authorized personnel of the College to release some or all of that student's education records by completing this authorization and consent form. The student will be given a copy of the completed form. This form must be filed by the student with each office which is being requested to share information with a third party.

Student Name (print): _____ Student ID: _____

I, the undersigned current or former student, hereby consent and authorize:

Office of Fraternity & Sorority Life and Dean of Students _____ (Office or Department or School) with the College of Charleston to release the following records upon the request of the person(s) identified below:

CHECK ALL APPLICABLE RECORD(S)

- | | |
|---|---|
| <input type="checkbox"/> All Educational Records Listed in this Form | <input type="checkbox"/> Financial Aid Records (includes grants, loans, scholarships) |
| <input checked="" type="checkbox"/> Academic Records
(includes transcript, grades reports, advising records) | <input checked="" type="checkbox"/> Student Affairs Records (includes housing, conduct/disciplinary, class absence records) |
| <input type="checkbox"/> Student Account and Billing Records | <input type="checkbox"/> Other Records (specify) _____

_____ |

The person(s) authorized to receive these records is (are):

Name, Address & Telephone: Justin Angotti // P.O. Box 240526, Charlotte, NC 28224 // jangotti@pikapp.org // (980) 318-5305

For the Purpose of: Reviewing grade reports and student conduct records as part of the Pi Kappa Phi Fraternity membership review

Name, Address & Telephone: _____

For the Purpose of: _____

DURATION OF AUTHORIZATION/CONSENT

(Complete first option for a limited duration consent/authorization. Otherwise complete second option for an indefinite consent/authorization.)

-- ONLY SIGN ONE SECTION--

☐ ***By my signature below, I acknowledge that this consent and authorization is valid from 9/7/2014 to 9/30/2014.***

Student's signature: _____ Date: _____

☒ ***By my signature below, I understand that this consent and authorization shall remain in effect until written revocation from me is received by the office/school/department above named, and that such revocation shall not affect disclosures previously made prior to the receipt of my written revocation.***

Student's signature: _____ Date: _____

For Official Use Only	
Form Received by: _____	Date: _____
Records Disclosed by: _____	Date: _____

REVOCATION OF CONSENT AND AUTHORIZATION

I, the above named student or former student, hereby revoke my consent and authorization to release my education records.

Student Signature: _____ Date: _____

For Official Use Only	
Revocation Received by: _____	Date: _____



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MEMBERSHIP REVIEW ACKNOWLEDGEMENT & AGREEMENT

PREAMBLE

On May 1, 2014, the Alpha Chapter was informed that a membership review would be conducted by the National Headquarters following violations of Pi Kappa Phi's standards of conduct. Consequently, a review process has been established by the National Headquarters staff in an effort to remediate the chapter.

In accordance with the memorandum dated September 5, 2014 ("Membership Review Process"), the National Headquarters staff of Pi Kappa Phi will interview any individual wishing to retain his status as an undergraduate member of the Fraternity, and following those interviews, will make a determination on the status of each member interviewed.

Any member wishing to retain his status as an undergraduate member of Pi Kappa Phi who disagrees with the determination made regarding his status in the Fraternity shall have the right of appeal, in writing, to the National Council, or its designee. Appeals shall be adjudicated without a presumption that the Interviewers' decision was correct. An appeal shall be limited to a review of any relevant notes collected during the course of the membership review, the appellant's written statement, and any written response or memoranda prepared by the National Headquarters.

Notice that the individual wishes to exercise such an appellate right must be submitted to the National Council, or its designee, within fourteen (14) days of the Interviewers' findings. The decision by the National Council, or its designee, on any appeal, and the decision by the Interviewer(s) with regard to any individual who does not file a timely appeal, shall be final.

ACCEPTANCE

I, the undersigned, have received, reviewed, and accept the terms and conditions outlined above in the Preamble, as well as those included in the memorandum dated September 5, 2014 ("Membership Review Process"). Additionally, pursuant to Section 2, Paragraph f of Supreme Law VIII, I hereby waive my rights as specified under Section 2, Paragraphs (a) through (e) of Supreme Law VIII, and consent to the decision of the National Council, or its designee, on any appeal and the decision of the Interviewer(s) should I not file a timely appeal.

Signature

Date

Printed Name



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STUDENT INFORMATION QUESTIONNAIRE

Please complete this questionnaire and bring it with you to your individual interview.

Name:

Cumulative GPA:

Major:

Spring 2014 GPA:

Semester Initiated:

Chapter Leadership Positions Held:

-
1. Describe Pi Kappa Phi's values, as well as the extent to which you believe the Alpha Chapter exemplifies each of those values.
 2. Describe the extent to which you participated in and/or failed to confront and stop the hazing activities that during the Spring 2014 semester (be specific).

3. When considering whether an event or activity will maintain the safety, well being, and dignity of our members, it is important to consider both the *intent* of the activity and the potential *impact* – mental, physical, or emotional – on those being asked, encouraged, or required to participate.

Using that information, what, if anything, should specifically be changed about the chapter's associate member education experience, why do you think it needs changed, and how would you change it?

4. Do you believe the Alpha Chapter should be undergoing a membership review? Why or why not?

5. What can you do to ensure the chapter prevents a violation of the College and National Fraternity's policies during the period of deferred charter revocation?

6. Describe your vision for the Alpha Chapter. What can you do to ensure the chapter truly leads the fraternity community at the College of Charleston?

Signature

Date



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MEMBERSHIP EXPECTATIONS AGREEMENT ALPHA CHAPTER (COLLEGE OF CHARLESTON)

Pi Kappa Phi Fraternity exists on the basis of shared values and standards of conduct as established in the Constitution, Supreme Laws, policies and resolutions of the Supreme Chapter, and Ritual of the Fraternity. Additionally, members are expected to hold each other accountable to these standards. The Fraternity expects its members, wherever they are, to adhere to high standards of honor and good citizenship and to conduct themselves according to the teachings of the Ritual of the Fraternity in a responsible manner that brings credit to the Fraternity. Specifically, as a member of Pi Kappa Phi, I agree to (*initial each*):

- _____ Abide by Pi Kappa Phi's Constitution, Supreme Laws, Ritual, and/or resolutions and policies of the Supreme Chapter, as well as the chapter's constitution, bylaws, house rules, and/or Code of Conduct as they now exist or may hereafter be enacted.
- _____ Abide by the College of Charleston policies and regulations governing students, fraternities, and fraternity members.
- _____ Abide by and actively enforce the Pi Kappa Phi Fraternity Risk Management Policy, as well as any applicable College and/or Interfraternity Council policies.
- _____ Abide by and actively enforce the chapter's sanctions from the College and National Fraternity, including the terms of the deferred charter revocation.
- _____ Meet or exceed the Fraternity's minimum expectations for members by paying my financial obligations when due and maintaining an grade point average at or above the Pi Kappa Phi's minimum standard.
- _____ Attend all chapter events (i.e. meetings, retreats, recruitment activities, philanthropy events, etc.) as required by the Alpha Chapter constitution and bylaws.
- _____ Ensure all members are treated with dignity and respect by actively enforcing the National Fraternity and College's hazing policies.
- _____ Ensure all recruitment and associate member activities remain alcohol-free by not consuming alcohol beforehand and ensuring alcohol is not available to members, potential new members, or associate members prior to, during, or after any of these events or activities.
- _____ Abide by and enforce the membership review results, including the reclassification of members to disciplinary alumni status under the terms and conditions outlined in the memorandum dated September 5, 2014.
- _____ Confront any member who violates these standards using both Ultimate Respect and the chapter Standards Board.

I, the undersigned, understand that failure to meet any of the included obligations of membership may constitute grounds for summary removal from the Alpha Chapter at a later date.

Signature

Date

Printed Name



PI KAPPA PHI

TO: Members of the Alpha Chapter (College of Charleston)

CC: Christian Wiggins, Chief Operating Officer
Chris Conner, Assistant Executive Director of Chapter Development
Scott Leighty, Director of Chapter Development
Trae Hestness, Leadership Consultant
Richard Pierce, Chapter Advisor
Sarah Loge, Director of Fraternity & Sorority Life (College of Charleston)

FROM: Justin Angotti, Assistant Executive Director of Education & Accountability

DATE: September 22, 2014

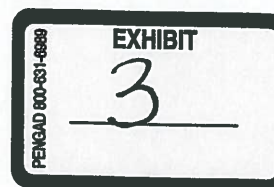
SUBJECT: Alpha Chapter Membership Review Results

Members of Pi Kappa Phi are expected to uphold and abide by certain standards of conduct as established by the Constitution, Supreme Laws, policies and resolutions of the Supreme Chapter, and Ritual of the Fraternity. Additionally, members are expected to hold each other accountable to these standards. When an individual is unable to conform to the expectations of a member of Pi Kappa Phi, however, it may be determined that he should no longer share in the privilege of participating in the Fraternity.

In accordance with the Alpha Chapter's decision letter dated May 1, 2014, and pursuant to the outlined Membership Review Process, the following staff members interviewed individuals wishing to retain their status as undergraduate members of the Fraternity on September 8, 2014: Justin Angotti, Assistant Executive Director of Education & Accountability; Chris Conner, Assistant Executive Director of Chapter Development; Nick Atzenbeck, Director of Chapter Development; and Ryan Lugabihl, Director of Chapter Operations.

The results contained herein are based on the interviews conducted, as well as other relevant information provided to the National Headquarters staff in accordance with the outlined Membership Review Process. All initiated members who participated in individual interviews, as well as those listed on the chapter's Fall 2014 Green Report, are included in the results.

The results of the membership review may be amended upon the receipt of additional, relevant information by the National Headquarters.



STUDENT MEMBERS & APPLICABLE RESTRICTIONS

The following initiated members will continue to be classified as student members of the Alpha Chapter and are subject to any additional restrictions outlined herein:

Nathan E. Akers	William B. Davis III	Conor T. Moran
P. Conner Akers	Alexander N. DiMeo	Stephen P. Muething
Bryce S. Baldelli	Brendan N. Edwards	Jacob P. Pierce
John P. Barrett	Lucas A. Freeman	Eric A. Rinklin
Brian J. Browne Jr.	Reilly C. Gardner	Luke L. Schweitzer
Nicholas T. Bullen	Justin C. Garraux	Maxwell N. Smith
Gunnar G. Burts	Michael P. Gelber	Trevor A. Stubbs-Stroud
Christopher R. Calligan	Simon G. Harris	William C. Vesley
Daniel A. Castro	Jeffrey L. Heath	Matthew V. Wightman
Christian D. Cherry	Shayne P. Lisa	Tyler L. Williams
Jordan T. Costello	Braxton S. Marshall	Bryan J. Williams
Bryn S. D'Andrea	William C. McKenzie	Benjamin R. Winckler

RESTRICTIONS ON STUDENT MEMBERS

Suspension for Financial Delinquency

The following initiated members are hereby suspended, effective immediately, pursuant to Supreme Law, for failure to pay their financial obligations when due based on the chapter's listing of past due accounts:

Bryce S. Baldelli	Jordan T. Costello	William C. McKenzie
John P. Barrett	Reilly C. Gardner	Jacob P. Pierce
Nicholas T. Bullen	Justin C. Garraux	Luke L. Schweitzer
Daniel A. Castro	Simon G. Harris	

The suspension of a member deprives him temporarily of all rights and privileges in the Fraternity. During this time, these members shall be prohibited from participating in any Fraternity activities, including but not limited to: meetings; rituals; social events; intramurals; philanthropy events; Big Brother/Little Brother events; brotherhood and associate member activities; or any other event a reasonable, objective observer would associate with the Fraternity.

These members shall remain suspended until they pay their outstanding financial obligations. During this time, the chapter shall remain responsible for all applicable dues and fees owed to the National Fraternity on behalf of these members, pursuant to Supreme Law. After a member has been suspended for ninety (90) days, his name shall be reported to the National Council, which shall expel the member from the Fraternity. Once expelled, the National Headquarters will credit the chapter's account for any outstanding dues and fees owed to the National Fraternity.

Probation & Associate Member Education Restrictions

The following individuals are hereby placed on probation until **May 15, 2015, the date of their graduation, or the discontinuation of their course of study at the College (whichever comes first)**. During this time, any violations of Pi Kappa Phi's Risk Management Policy, standards of conduct, or the Alpha Chapter Code of Conduct may lead to further discipline by the Alpha Chapter Standards Board or a duly-appointed National Council Hearing Committee with notification of applicable sanctions to the Director of Chapter Development. Violations of the Fraternity's standards of conduct may be grounds for summary removal from the chapter and reclassification to disciplinary alumni status.

Additionally, these individuals are **prohibited from participating in associate member education activities during the probationary period**. This restriction includes, but is not limited to, participation in the completion of any sanctions involving the rewrite of the chapter's associate member education program, associate member education meetings, subordinate rituals, the Big Brother/Little Brother program, associate member class retreats, and any other activity that is specifically geared toward associate members.

Jeffrey L. Heath

Braxton S. Marshall

Matthew V. Wightman

Academic Probation

The following initiated members are hereby placed on academic probation **until the conclusion of the Fall 2014 semester**. If these members are still below the minimum academic standards established by Supreme Law at the conclusion of the probationary period, they may be automatically reclassified to disciplinary alumni status in accordance with the terms and conditions outlined herein or their probationary period may be extended at the discretion of the National Headquarters staff.

Bryce S. Baldelli
Christopher R. Calligan
Christian D. Cherry

William B. Davis III
Brendan N. Edwards
Jacob P. Pierce

Luke L. Schweitzer
Bryan J. Williams

Restrictions on Chapter Leadership Positions: Academic Eligibility

In accordance with Supreme Law VI, Subdivision 3, Section 13, to be eligible to hold an officer position, a member must have attained and maintain a cumulative grade point average at or above the all-men's average on campus; or a cumulative GPA at or above 2.6 for the Fall 2014 semester.

Based on the information available, the following individuals are prohibited holding an elected or appointed leadership position **until they meet one of the above outlined academic eligibility requirements**. This includes, but is not limited to, being elected to the chapter's Executive Council, being appointed as a committee chairman or committee member, or serving on the chapter Standards Board.

P. Conner Akers
Bryce S. Baldelli
Christopher R. Calligan
Christian D. Cherry

William B. Davis III
Alexander N. DiMeo
Brendan N. Edwards
Jeffrey L. Heath

Jacob P. Pierce
Luke L. Schweitzer
Bryan J. Williams

INDIVIDUALS PREVIOUSLY EXPELLED FOR FINANCIAL DELINQUENCY

Pursuant to Supreme Law VIII, Section 11, Paragraph a, **M. Benjamin Byrd** was reported to the National Council for expulsion from Pi Kappa Phi Fraternity on September 13, 2014 after being suspended for ninety (90) days for failure to pay their financial obligations when due. By resolution of the National Council, Mr. Byrd was duly expelled from the Fraternity.

The expulsion of a member is the permanent dissolution of the fraternal relationship between the individual and the Fraternity. An expelled member loses all rights and privileges and forfeits all claims on the Fraternity. Mr. Byrd may not again become a member of the Fraternity in good standing unless authorized for reinstatement by the National Council upon the verification that all outstanding financial obligations to the Alpha Chapter have been satisfied.

MEMBERS RECLASSIFIED TO DISCIPLINARY ALUMNI STATUS

Robert L. Hainey did not complete the requirements for retaining undergraduate student status outlined in the memorandum dated September 5, 2014. Consequently, Mr. Hainey is hereby reclassified, effective immediately, to **disciplinary alumni status**, which will preserve his membership in the Fraternity but **preclude him from any involvement in the operations or activities of an undergraduate chapter for a period of no less than four (4) years**. This includes, but is not limited to, participation in rituals, social events, intramurals, brotherhood and associate member activities; contact with the chapter property, outside of the execution of a valid lease agreement; and attendance at any event hosted by the undergraduate chapter. **Any alumnus or student member who violates this sanction is subject to conduct proceedings as outlined in Pi Kappa Phi's Conduct Code. Possible sanctions for such violations may include expulsion from the Fraternity.**

In the event Mr. Hainey has outstanding financial obligations to the Alpha Chapter that were incurred prior to the date of this memorandum, he shall be responsible for the payment of such obligations pursuant to Supreme Law and any agreements made with the chapter. **Failure to pay his outstanding financial obligations shall subject Mr. Hainey to the summary actions outlined in Supreme Law, including expulsion from the Fraternity.**

Additionally, effective immediately, **Stuart J. Mason** is hereby reclassified to **disciplinary alumni status**, which will preserve his membership in the Fraternity but **preclude him from any involvement in the operations or activities of an undergraduate chapter for a period of no less than four (4) years**. This includes, but is not limited to, participation in meetings, rituals, social events, intramurals, recruitment activities, philanthropy events, brotherhood and associate member activities, and initiation; contact with the chapter property, outside of the execution of a valid lease agreement entered into prior to the date of this memorandum; and attendance at any event hosted by the undergraduate chapter. **Any alumnus or student member who violates this sanction is subject to conduct proceedings as outlined in Pi Kappa Phi's disciplinary code. Possible sanctions for such violations may include expulsion from the Fraternity.**

In the event Mr. Mason has outstanding financial obligations to the Alpha Chapter that were incurred prior to the date of this memorandum, he shall be responsible for the payment of such obligations pursuant to Supreme Law and any agreements made with the chapter. **Failure to pay his outstanding financial obligations shall subject Mr. Mason to the summary actions outlined in Supreme Law, including expulsion from the Fraternity.**

APPEALS PROCESS FOR INITIATED MEMBERS

As outlined in the Membership Review Acknowledgement and Agreement, any member wishing to retain his undergraduate student status who disagrees with the determination made regarding his status in the Fraternity shall have the right of appeal. **Notice that the individual wishes to exercise such an appellate right must be submitted to Ryan Lugabihl, Director of Chapter Operations, via e-mail (rlugabihl@pikapp.org) by October 6, 2014 at 5:00pm (EDT).** The National Council shall prescribe the procedure for all appeals. The decision of the National Council, or its designee, on any appeal and the decision by the Interviewer(s) with regard to any individual who does not file a timely appeal shall be final.



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RISK MANAGEMENT POLICY AS ADOPTED FEBRUARY 2016

The Risk Management Policy of Pi Kappa Phi Fraternity, adopted by the National Council pursuant to Article IV of the Constitution, mirrors the FIPG, Inc. Risk Management Policy, includes the following provisions, and applies to all fraternity entities and all levels of fraternity membership.

ALCOHOL AND DRUGS

1. The possession, sale, use, or consumption of ALCOHOLIC BEVERAGES, while on chapter premises or during a fraternity event, in any situation sponsored or endorsed by the chapter, or at any event a reasonable, objective observer would associate with the fraternity, must be in compliance with any and all applicable laws of the state, province, county, city, and institution of higher education and must comply with either the BYOB or third party vendor guidelines.
2. No alcoholic beverages may be purchased through or with chapter funds nor may the purchase of same for members or guests be undertaken or coordinated by any member in the name of or on behalf of the chapter. The purchase or use of a bulk quantity or common source(s) of alcoholic beverage, including but not limited to kegs or cases, is prohibited.
3. OPEN PARTIES, meaning those with unrestricted access by non-members of the fraternity without specific invitation, where alcohol is present, are prohibited.
4. No members, collectively or individually, shall purchase for, serve to, or sell alcoholic beverages to any minor (i.e. those under legal drinking age).
5. The possession, sale, or use of any ILLEGAL DRUGS or OTHER CONTROLLED SUBSTANCES while on chapter premises or during a fraternity event or at any event that a reasonable, objective observer would associate with the fraternity is strictly prohibited.
6. No chapter may co-sponsor an event with an alcohol distributor or tavern (tavern defined as an establishment generating more than half of annual gross sales from alcohol) at which alcohol is given away, sold, or otherwise provided to those present. This includes any event held in, at, or on the property of a tavern as defined above for purposes of fundraising. However, a chapter may rent or use a room or area in a tavern as defined above for a closed event held within the provisions of this policy, including the use of a third party vendor and guest list. An event at which alcohol is present may be conducted or co-sponsored with a charitable organization if the event is held within the provisions of this policy.
7. No chapter may co-sponsor, co-finance, attend, or participate in a function at which alcohol is purchased by any of the host chapters, groups, or organizations.
8. All recruitment or rush activities associated with any chapter will be non-alcoholic. No recruitment or rush activities associated with any chapter may be held at or in conjunction with a tavern or alcohol distributor as defined in this policy.
9. No member or associate member shall permit, tolerate, encourage, or participate in "drinking games." The definition of drinking games includes but is not limited to the consumption of shots of alcohol, liquor, or alcoholic beverages; the practice of consuming shots equating to one's age; "beer pong;" "century club;" "dares;" or any other activity involving the consumption of alcohol that involves duress or encouragement related to the consumption of alcohol.
10. No alcohol shall be present at any associate member activity or ritual of the chapter. This includes but is not limited to activities associated with "bid night," "Big Brother - Little Brother" events or activities, "family" events or activities, and initiation.



HAZING

No chapter, associate chapter, student, alumnus, or volunteer shall conduct nor condone hazing activities. Permission or approval by a person being hazed is not a defense. Hazing activities are defined as:

"Any action taken or situation created, intentionally, whether on or off fraternity premises, to produce mental or physical discomfort, embarrassment, harassment, or ridicule. Such activities may include but are not limited to the following: use of alcohol; paddling in any form; creation of excessive fatigue; physical and psychological shocks, quests, treasure hunts, scavenger hunts, road trips, or any other such activities carried on outside or inside of the confines of the chapter house; wearing of public apparel that is conspicuous and not normally in good taste; engaging in public stunts and buffoonery; morally degrading or humiliating games and activities; and any other activities that are not consistent with academic achievement; fraternal law, ritual, or policy; the regulations and policies of the educational institution; or applicable state law."

SEXUAL ABUSE AND HARASSMENT

The fraternity will not tolerate or condone any form of sexist or sexually abusive behavior on the part of its members, whether physical, mental, or emotional. This is to include any actions, activities, or events, whether on chapter premises or an off-site location, that are demeaning to women or men, including but not limited to verbal harassment and sexual assault by individuals or members acting together. The employment or use of strippers, exotic dancers, or similar, whether professional or amateur, at a fraternity event as defined in this policy is prohibited.

FIGHTING AND PHYSICAL ABUSE

The fraternity will not tolerate or condone any form of fighting or physically abusive behavior while on chapter premises or during a fraternity event, in any situation sponsored or endorsed by the chapter, or at any event a reasonable observer would associate with the fraternity.

FIRE, HEALTH, AND SAFETY

1. All chapter houses should meet all local fire and health codes and standards.
2. All chapters should post by common phones and in other locations emergency numbers for fire, police, and ambulance and should have posted evacuation routes on the back of the door of each sleeping room.
3. All chapters should comply with engineering recommendations as reported by the insurance company or municipal authorities.
4. The possession and/or use of firearms or explosive or incendiary devices of any kind on chapter premises or during a fraternity event or in any situation sponsored or endorsed by the chapter is prohibited.
5. Candles should not be used in chapter houses or individual rooms except under controlled circumstances such as initiation.

WATER FEATURES

The use of self-constructed pools, bodies of water, slip-and-slides, or similar on chapter premises or at any event a reasonable observer would associate with the fraternity is prohibited.

EDUCATION

All student members and associate members shall be instructed on the Risk Management Policy of Pi Kappa Phi Fraternity annually. A copy of the Risk Management Policy is also available on the Fraternity's website.



SOCIAL MEDIA GUIDE

This guide is intended to provide basic social media knowledge to Pi Kappa Phi members in order to allow chapters and brothers from across the country to connect and share their positive fraternity experience with the general public.

THIS RESOURCE CONTAINS THE FOLLOWING:

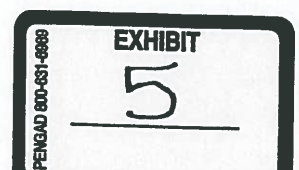
- Guidelines that are established to protect our members and the image of the fraternity.
- Brand standards that are meant to provide consistency in quality and content throughout our chapters
- Best practices for effective marketing and public relations.
- References to social media sites managed and created at the national level.

GENERAL GUIDELINES

- Please remember privacy on social media is very low; nonmembers can and do have access to many of our chapter's existing pages and accounts. Ensure that your content is appropriate, contains only public information about the fraternity, and portrays Pi Kappa Phi in a positive light.
- Social media should be a fun way to share and promote the identity of your chapter. Your first priority should be to promote a positive image of Pi Kappa Phi. Your content should also reflect positively on the organization's environment (university, college, city, state).
- We are proud to be Exceptional leaders. Be sure that your content does not contradict our values. When posting pictures on Facebook, Twitter, Instagram, Flickr, etc. remember the impact your photograph may have on the chapter and the national organization. Social media is a very public world, the chapter should be sure that content found on their pages or accounts do not violate any university, Pi Kappa Phi or FIPG policy.
- Pi Kappa Phi staff does not search for posts or photographs with violations of FIPG policy or Pi Kappa Phi Supreme Law, but if tagged pictures or statements show up on the staff's or volunteer's news feeds, we are legally obligated to investigate the content.
- Questions or Concerns - Please direct any inquiries regarding social media to jandrews@pikapp.org.

FACEBOOK

- Promotion of Events



- Chapter Events - No events that include alcohol may be publicized or listed on Facebook, even if the event has been approved by the university or Fraternity/Sorority Life office.
- The chapter hosting the event must regularly monitor all content posted by guests on the wall of the event and should remove content immediately that does not adhere to the guidelines set forth in this document.
- Chapters should only publicize activities with appropriate event names via Facebook.
- Pages and Groups
 - Facebook currently offers two networking tools to organize and promote a chapter or alumni chapter: Groups and Fan pages.
 - Fan pages - Forum for a chapter's "public" presence on Facebook. Good vehicle to provide information to members, potential new members, friends, family and others. Fan pages are primarily used to provide interesting and entertaining content to fans as well as begin conversation between fans. Fan pages can be viewed and added by anyone with a Facebook profile.
 - Groups - Forum to facilitate and encourage interaction within a specific group. Useful for ongoing communication between group members through discussion topics. Group members can be invited to join in bulk. These groups privacy settings should typically be "closed" or "secret." Even though groups are less public than a page, they should still be treated as a public forum as anyone can take a screenshot of content in that closed group.
- Pi Kappa Phi Fan Page
 - We would like to encourage our members to utilize the Pi Kappa Phi Fan page as a way to communicate with the Pi Kappa Phi Headquarters and brothers across the country. Any fans are encouraged to post chapter or member news. We also hope to see your responses to our questions, photos and other posts.

TWITTER

- Suggested usernames for chapter or alumni chapter Twitter accounts is "UniversityNamePiKapp" (e.g., "@USMPiKapp" or "@DukePiKapp"). Existing Twitter accounts do not need to be renamed.
- Follow @PiKappaPhi for content from the fraternity to retweet (RT @PiKappaPhi) to your followers.
- Please be sure to share any individual or chapter news with the national office and brothers across the country by tweeting it to @PiKappaPhi. This will allow your news to be spread to thousands of Pi Kappa Phi fans and followers.
- Be sure your chapter is included on our master Twitter list of Pi KappaPhi Chapters. If your chapter is not listed, please tweet @PiKappaPhi and let us know.
- The nature of Twitter is that users regularly follow others they do not know personally. It is more likely on Twitter than any other social media site that your chapter or alumni group will have unknown/non-Pi Kappa Phi followers. Please keep this in mind when using any proprietary or potentially sensitive information for your tweets.

INSTAGRAM

- Pi Kappa Phi (@PiKappaPhi) is on Instagram.
- Tag fraternity-related photos with @PiKappaPhi, #PiKappaPhi or #PiKapp to share your photos with brothers.
- Be sure to keep content safe and appropriate. You don't want your content to tarnish your reputation or the reputation of the fraternity.

LINKEDIN

- Pi Kappa Phi has created a LinkedIn group for all Pi Kappa Phi members. In order to join the group, the national office must verify all members after a request to join is submitted.
- Once you have joined the group, be sure to post and introduce yourself to the members. Simply providing your professional introduction could be very beneficial.
- We encourage brothers to post relevant content and create conversation within the group. As questions about your profession, publicize alumni news, share interesting articles, etc.

PINTEREST, PERISCOPE, FOURSQUARE ETC.

- New social media websites are popping up frequently. If your chapter creates a new profile, group or page, please contact the communication team to share your work and keep the national office aware of the advancements made by your chapter.

OFFICIAL PI KAPPA PHI SOCIAL MEDIA OUTLETS

- Pi Kappa Phi's main social media sites include:
 - Facebook fan page - <http://www.facebook.com/thepikapps>
 - Twitter - <http://twitter.com/pikappaphi>
 - LinkedIn- <http://www.linkedin.com/groups?mostPopular=&gid=44917>
 - Instagram- @PiKappaPhi
 - Flickr- <http://www.flickr.com/photos/pikapphq>
 - Periscope- @PiKappaPhi
- To protect chapter and member privacy, Pi Kappa Phi does not publish an online database of official chapter/association Facebook links.
- It is appropriate to post a link to your chapter or association Facebook and/or Twitter accounts on your organization's website.

UNACCEPTABLE CONTENT and TERMINOLOGY TO AVOID

- Photo Albums - All photos posted must be appropriate in nature and should not include alcoholic beverage containers or drug paraphernalia.
- Any written references to alcohol, drugs or drinking.
- Anything associated with the Ritual of Initiation or related materials.
- References to hazing or pledges will not appeal to potential new members. Even from a member's personal account, these conversations can hinder your chapter's growth.
- Totalfratmove.com (TFM) and its various social media accounts are popular humor sites within college communities; however, we encourage members to refrain from

posting TFM content. Even if done so for strictly humorous reasons, this content feeds anti-fraternity perspectives.

BRANDING

- The Star Shield graphic is the ideal logo for new media presence. While symbols such as the crest, the flag or bell certainly have good use, the Star Shield is the official logo of Pi Kappa Phi and is a unique within the interfraternal community. If used consistently, the Star Shield is effective branding images that can help viewers identify the fraternity. Please view Pi Kappa Phi's brand guidelines for access to our official logos and information on how to brand your social media accounts correctly.
- Any questions related to branding can be directed to Assistant Communication Director Victor Tran at vtran@pikapp.org
- Chapters and alumni groups may use any images created and posted by the national organization.



ADVISING GUIDE (UPDATED MARCH 2017)

PI KAPPA PHI FRATERNITY

MISSION | To create an uncommon and lifelong brotherhood that develops leaders and encourages service to others for the betterment of our communities.

VISION | A future where every Pi Kappa Phi embraces his role as a leader, puts service before self and improves the world around him.

TAGLINE | Exceptional Leaders. Uncommon Opportunities.

STUDENT CREED VALUES

- Common Loyalty
- Personal Responsibility
- Achievement
- Accountability
- Campus Involvement
- Responsible Citizenship
- Lifelong Commitment

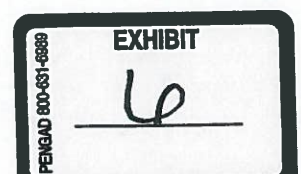
THE ABILITY EXPERIENCE

MISSION | We use shared experiences to support people with disabilities and develop the men of Pi Kappa Phi into servant leaders.

VISION | Create a community, one relationship at a time, where the abilities of all people are recognized and valued.

CORE VALUES

- Empathy
- Integrity
- Abilities
- Teamwork



OUR PHILOSOPHY OF ADVISING

As facilitators, Chapter Advisors partner with students, headquarters' staff, other fraternity volunteers, and campus staff to help the chapter make intelligent, fair, and reasonable choices within the boundaries established by state, federal, and local laws, headquarters' and university rules, and the educational mission of the institution and the overarching mission of Pi Kappa Phi. The goal of the facilitator is to advise students on the approach to managing chapter operations and of the potential and perceived risks involved in chapter activities or events. Our goal is to provide students the support and opportunity to make decisions that advance the chapter and empower them to minimize or eliminate risks to an acceptable level.

Advisor's Role in the Partnership

- Accept the newly defined responsibility to engage in dialogue about chapter operations and risk management with students
- Appropriately utilize headquarters' services to frame strategies for meeting the challenges of advising responsibility
- Appropriately utilize campus services to frame strategies for meeting the challenges of advising responsibility
- Clearly communicate expectations to chapter membership and leadership
- Design proactive relationship to empower students to create a safe and productive environment
- Respond appropriately to decisions and/or incidents that are not aligned with expectations

Student's Role in the Partnership

- Accept responsibility as both individuals and members of a community to proactively manage chapter operations and risks and by doing so care for member and guests
- Embrace the proactive processes that serve as the foundation for their partnership with the chapter advisor, institution and Pi Kappa Phi National Office
- Clearly communicate expectations to membership of the chapter
- Design internal systems to empower leadership and members to proactively manage chapter operations and risks
- Respond appropriately to decisions and/or incidents that are not aligned with expectations



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WHO TO CONTACT (UPDATED FEBRUARY 2017)

ACADEMIC SUCCESS

Chapter Scholarship Resources
Foundation Scholarships
Order of the Lamp

Dylan McKenzie
Vicky Halsey
Dylan McKenzie

ALUMNI ENGAGEMENT

Affinity Networks
Alumni Awards (including Thirty Under 30)
Alumni Chapters
Alumni Lists & Contact Information
Anniversaries & Chapter Alumni Event Support
Contact Information Updates
City/Regional Alumni Events
Family Member Program
Graduating Senior Transition
Regional Governors & City Engagement Coordinators
Vendor Relationships (including Nationwide)

Andrew Bublitz
Andrew Bublitz
Andrew Bublitz
www.pikapp.org
Carrie Clifford
Carrie Clifford
Carrie Clifford
Andrew Bublitz
Andrew Bublitz
Denise Nelson
Denise Nelson

CHAPTER DEVELOPMENT

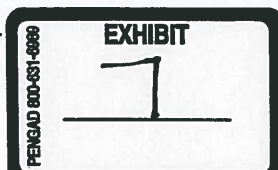
Associate Chapter & Chartering Inquiries
General Chapter Development
Leadership Consultant Feedback & General Inquiries
Leadership Consultant Recruitment & Hiring
Minimum Chapter Standards Compliance
National Awards Process
Seven Objectives of Chapter Excellence Reporting

Dalton Guthery
Brent Grunig
Brent Grunig
Brandon Belote
Justin Angotti
Kate Andrews
Brent Grunig

CHAPTER OPERATIONS & FINANCES

Certificate of Insurance Requests - University Requirement
Chapter Billing & Balances
Chapter Gateway
Fee Inquiries & Payment Plans
General Insurance Inquiries (Non-Billing)
Green Report Questions & Updates
IRS 990 Inquiries
Member & Officer Updates
National Council Administrative Deadline (NCAD) Inquiries
OmegaFi

Justin Angotti
C. Brad Middleton
Kate Andrews
C. Brad Middleton
Justin Angotti
Kate Andrews
C. Brad Middleton
Kate Andrews
C. Brad Middleton
C. Brad Middleton



COMMUNICATIONS & MEDIA RELATIONS

Alumni Newsletters
Chapter News Briefs & Success Stories
e-Newsletters
Fraternity Images & Logos
New Releases
Social Media
Star & Lamp Content & Submission Deadlines
Star & Lamp Subscription Management
The Ability Experience Images & Logos

Victor Tran
letusknow@pikapp.org
Todd Shelton
Victor Tran
Todd Shelton
John Andrews
Todd Shelton
Carrie Clifford
Victor Tran

EXPANSION & GROWTH

Expansion Inquiries
Interest Group Cultivation & Inquiries
Legacy Referrals
Recruitment Support & Resources

James Maloney
James Maloney
Brent Grunig
James Maloney

MEMBER EDUCATION

Associate Member Education Resources
Four-Year Member Development Resources
Test on the 10th Resources
Subordinate Ritual Resources

Dylan McKenzie
Rachel Westra
Dylan McKenzie
Dylan McKenzie

MERCHANDISE & SUPPLIES

Bid Cards & Initiation Cards
Gold Books
Merchandise Ordering & Inquiries (including *The White Diamond*)
Ritual Books & Paraphernalia
Member Shingles & ID Cards

Kate Andrews
Justin Angotti
Vicky Halsey
C. Brad Middleton
Kate Andrews

NATIONAL EVENTS

Certified Ritualist Training
Pi Kapp College for Chapter Officers - Logistics
Pi Kapp College for Chapter Officers - Programming & Curriculum
Pi Kapp College for Emerging Leaders
Summer Alumni Reunion
Supreme Chapter - Alumni Registration, Events, & Inquiries
Supreme Chapter - Student Registration, Events, & Inquiries

Dylan McKenzie
Meghan Gibson
Rachel Westra
Dylan McKenzie
Denise Nelson
Denise Nelson
Kate Andrews

PI KAPPA PHI FOUNDATION

Chapter Investment Funds
Making a Gift

Vicky Halsey
DeVin Taylor

PI KAPPA PHI PROPERTIES

Housing Acquisition Inquiries
Infrastructure Loan Fund (ILF) Inquiries
Lease Inquiries

Greg Buehner
Greg Buehner
Greg Buehner

PIKAPP.ORG

Event Posting
Username & Password Inquiries
Website Accessibility Issues
Website Stories

Carrie Clifford
Kate Andrews
Todd Shelton
letusknow@pikapp.org

PREVENTION EDUCATION

Alcohol Skills Training Program (ASTP)
Certificate of Insurance Requests - Events
Counseling Resources
GreekLifeEdu
Ladder of Risk Program
Program Fines
Social Event Planning Resources
Ultimate Respect in Action Program

Meghan Gibson
Brooke Kingsley Isbell
Brooke Kingsley Isbell
Meghan Gibson
Meghan Gibson
Meghan Gibson
Brooke Kingsley Isbell
Meghan Gibson

STUDENT & CHAPTER CONDUCT

Chapter Conduct & Sanction Inquiries
Chapter Incident Reporting
Individual Member Expulsions & Resignations
Sexual Misconduct Incident Reporting
Individual Member Financial Suspensions & Expulsions

Justin Angotti
Justin Angotti
Justin Angotti
Justin Angotti
Kate Andrews

THE ABILITY EXPERIENCE

AccessAbility, Ability Weekends, Ability Camps, & Summer Fellowships
Disability Awareness & Volunteerism Resources
Fundraising Resources & Circle of Giving Grants
Joining the Build America Team
Joining the Journey of Hope & Gear Up Florida Teams
The Ability Experience Challenges
The Ability Experience Event Planning Resources & Support

Gary Sugg
Eric Kierszkowski
Eric Kierszkowski
Spencer Haworth
Spencer Haworth
Andrew Matznick
Eric Kierszkowski

VOLUNTEER SERVICES

Chapter Advisor Symposium
Chapter Advisor Convocation
Chapter Advisors and Council of Advisors

Beau Samples
Beau Samples
Beau Samples

WORKSHOPS & RETREATS

Officer Transition Plan
Recruitment Workshop
Strategic Planning Workshop
Space Reservation at the Kelley A. Bergstrom Leadership Center
Visits to the Kelley A. Bergstrom Leadership Center

Brent Grunig
Dalton Guthery
Rachel Westra
Dylan McKenzie
Dylan McKenzie



Q Search

**Conor Moran**

Square up. I'll put my life savings on daily

52 minutes ago · Like ·  1 · Reply**Sean Patric**

This was these pledges first time having the time of there lives and if you are going to punch a brother over a stupid fucking girl. Go fuck yourself. I will personally square up with you but that doesn't matter cuz you are gone brother. Pussiest move i have ever seen in my life. We will get 80 bros behind us to burry you fucking queer

38 minutes ago · Like ·  1 · Reply**Sean Patric**

Never step foot in my house again cuz i will end your god damn life. As well as 80 other ppl who think you are the biggest pussy to step foot on planet earth

37 minutes ago · Like ·  2 · Reply

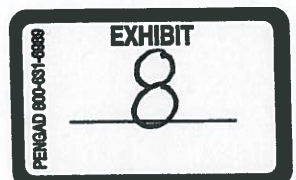
Write a reply...

**Daniel Clavier**

Hand down man down

19 minutes ago · Like ·  1 · Reply**Bryn Sean D'Andrea**

Write a comment...



INCIDENT/INVESTIGATION REPORT

Charleston Police Department

Case # 17-06538

Status Codes 1 = None 2 = Burned 3 = Counterfeit / Forged 4 = Damaged / Vandalized 5 = Recovered 6 = Seized 7 = Stolen 8 = Unknown

D R U G S	IBR	Status	Quantity	Type Measure	Suspected Type	

Assisting Officers

Suspect Hate / Bias Motivated:

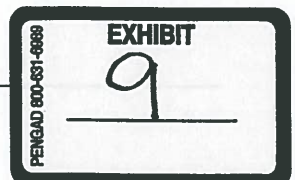
NARRATIVE

On 04-16-2017 at 029hrs. R/O responded to 6 Woolfe St Apt. C in reference to an assault. Upon arriving on scene R/O made contact with the complainant/ victim (Tyler Kim) and observed that the victim had a bloody nose and blood smeared on his chest. The victim stated that 4 of his Fraternity (Pi Kapa Phi at CofC) brothers beat him. The victim advised that he knows all 4: Shawn Daily (43 Coming St), Mathew Lounge (43 Coming St), Mike Allewelt (The Warren dorm at CofC), and Steve Leone (53 South St).

The victim advised that he was in a verbal altercation with the 4 offenders at a party and decided to leave. The offenders then followed him home and proceeded to enter the residence. Once the offenders entered the residence, they proceeded to punch the victim in the face with closed fists several times and tackled him to the floor. The victim advised that once he was on the floor they stopped and left the scene going West bound on Woolfe St towards Meeting St. Let it be known that the victim advised that these are close friends of his so they frequent his residence often.

One of the offenders (Shawn Daily) posted the following on the victims Facebook page sometime between the argument and the fight: "We will get 80 bros behind us to burry you. you fucking queer."

The victim was checked out by Fire but denied EMS. R/O issued the victim a business card with case number.





Q Search



Live

Photo

Check In

**Joey Ferrelli** ▶ Shotcallerz OG

2 mins ·

Brothers,

Sometime this week, the Post and Courier will be posting an article about our assault incident a few weeks ago. I have been informed to warn u all that it will be coming out, and also to not talk to and reporters/investigators. If they do contact u, which they most likely will not, just tell them to please contact our national headquarters for information. I also just want to say that everything is going to be okay and that we are going to get through this. Headquarters and the school are aware of the situation and will tell us what steps to take. Everything will be fine. As Richard says, continue to be smart and do the right thing.

Archon Ferrelli
Alpha 1263

Mikey Henzy and 9 others

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Suggested Video

