

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION  
CASE NO.: 3:18-CV-1604-MGL

Allison R. Dunavant, )  
                          )  
Plaintiff,            )  
                          )  
v.                     )  
                          )  
University of South    )  
Carolina, The International    )  
Center for the Arts, LLC,    )  
David W. Voros and Harris    )  
Pastides,             )  
                          )  
Defendants.            )

**COPY**

DEPOSITION OF

PETER M. CHAMETZKY

\*\*\*\*\*

Thursday, August 8, 2019

10:05 a.m. - 12:20 p.m.

The deposition of PETER M. CHAMETZKY was taken before Christine A. Cortright, a notary public in and for the State of South Carolina, commencing on August 8, 2019, at the law offices of Cromer Babb Porter & Hicks, 1418 Laurel Street, Suite A, Columbia, South Carolina, pursuant to Notice of Deposition and/or agreement of counsel.

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22 Also Present (Via Telephone):

23 David Voros  
24  
25

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## 1 STIPULATIONS

2 It is stipulated by and between counsel for  
3 the respective parties that all objections are  
4 reserved until the time of trial, except as to the  
5 form of the questions.

6 This deposition is being taken pursuant to  
7 the Federal Rules of Civil Procedure.

8 - - - -

9 The reading and signing of this deposition  
10 is waived by the deponent and counsel for the  
11 respective parties.

12 Whereupon,

13 PETER M. CHAMETZKY, being duly sworn and cautioned  
14 to speak the truth, the whole truth, and nothing  
15 but the truth, testified as follows:

## 16 EXAMINATION

17 BY MS. ALBRECHT:

18 Q. Good morning, Mr. Chametzky. My name is Samantha  
19 Albrecht; I introduced myself a few minutes ago.  
20 I'm an attorney at Cromer Babb Porter & Hicks and  
21 we represent Allison Dunavant in a case against the  
22 University. Can you please state your full name  
23 for the record?

24 A. Peter Martin Chametzky.

25 Q. Mr. Chametzky, have you ever been deposed before?

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1 A. No.

2 Q. Before we get started, I'm going to go through some

3 ground rules, as well as my own recommendations to

4 try and make this go as fast and smoothly as

5 possible for you. First, you're required to ask

6 me, now that your deposition has begun, for any

7 clarifications, questions on any of the questions I

8 ask you or documents I present you throughout the

9 course of your deposition. If you answer a

10 question that I've asked, I'm going to assume that

11 you understood what that question is. Second, your

12 attorney or one of the others in this room may

13 object to the form of my question but you will

14 still need to answer that question unless you're

15 specifically told not to. Third, you're not

16 allowed to engage in any private, off-the-record

17 conferences with your attorney now that the

18 deposition has begun until after the deposition has

19 concluded. If you engage in those conversations

20 during any break we may take, I can ask you about

21 those conversations. Additionally, I want to point

22 out to you that we have a court reporter recording

23 everything that we're all saying. With that in

24 mind and to keep the record clear, try and allow me

25 to finish speaking before you begin answering, even

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1                   if you can tell where my question is going.

2   A.    Uh-huh.

3   Q.    And I will try my best to allow you to finish  
4                   everything you want to say in response before I  
5                   begin speaking again.  We also have a tendency to  
6                   give nonverbal or unclear answers; we nod or shake  
7                   our head, we say uh-huh or huh-uh.  That doesn't  
8                   get taken down by our Court Reporter so to make  
9                   sure your intended answer is clear on the record  
10                  when we receive it down the line, make sure to give  
11                  a clear affirmative or negative response to the  
12                  questions.  This should not take all day but if you  
13                  need breaks, we will take them.  Just let us know  
14                  and we'll accommodate breaks for you.

15   A.    Thank you.

16   Q.    Do you understand everything I've just gone  
17                  through?

18   A.    Yes.

19   Q.    Did you do anything to prepare for today's  
20                  deposition?

21   A.    We met two days ago.

22   Q.    Okay.

23   A.    The attorney and I, Evan.

24   Q.    That would be one of those things that doesn't get  
25                  taken down.

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1 A. Yes.

2 Q. But I understand.

3 A. Evan Gessner.

4 Q. Did you review any documents to prepare for today's

5 deposition?

6 A. Yes, he brought some documents to that meeting.

7 Q. Okay. Who, if anyone, have you talked to about

8 your deposition here today?

9 A. I've told my wife that I'm doing it. I also told

10 Laura Kissel, the current director of the School of

11 Visual Art and Design.

12 Q. Is there anything that might make it difficult for

13 you to truthfully answer my questions today?

14 A. No.

15 Q. Do you have any issues with recall or your memory

16 in general, whether medical or otherwise?

17 A. No, I don't.

18 Q. Are you taking any drugs or medications that might

19 interfere with your ability to answer my questions?

20 A. No.

21 Q. Is there any other reason, whatever it is, you

22 think might hinder you from giving me full,

23 complete, truthful answers to my questions?

24 A. No, I don't think so.

25 Q. Do you understand that if your testimony differs at

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1                   the trial for this case that we will ask you about  
2                   that at trial?

3       A.    Yes.

4       Q.    If at any time today you realize that an answer  
5                   you've given me is either wrong or incomplete, will  
6                   you tell me about that before your deposition  
7                   concludes?

8       A.    Yeah.

9       Q.    What is your current address?

10      A.    2800 Wheat Street, Columbia, South Carolina, 29205.

11      Q.    And how long have you lived there?

12      A.    Moved in in March of 2013.

13      Q.    What other cities or towns have you lived in in the  
14                   last ten years?

15      A.    We moved here from Columbia -- I'm sorry, we're in  
16                   Columbia now -- from Carbondale, Illinois. Prior  
17                   to that, I lived in Brooklyn, New York. I lived a  
18                   year in Stuttgart, Germany. I lived a year -- oh,  
19                   wait a minute, I lived a year in Berlin, Germany  
20                   when we were living in Carbondale so that was 2005.  
21                   Prior to that, prior to Carbondale where we moved  
22                   in 1998, lived in Brooklyn from 1991 to '98.  
23                   Manhattan from 1982 to '98 with a year in  
24                   Stuttgart, Germany. In '80 -- how many years are  
25                   we going back?

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1 Q. Just ten so you're --  
2 A. I think I've covered that already.  
3 Q. -- you've more than covered it.  
4 A. Carbondale covers the ten.  
5 Q. Okay.  
6 A. So it's just -- it would just be here for the last  
7 seven years, Carbondale was 14 years with one year  
8 in Berlin punctuating that.  
9 Q. I saw you taught at SIU. I'm from Illinois.  
10 A. Oh, good.  
11 Q. What is your date of birth?  
12 A. 12/2/1958.  
13 Q. Are you married?  
14 A. Yes.  
15 Q. To whom?  
16 A. Susan Felleman, F-E-L-L, not Sullivan which often  
17 gets confused, people often hear Sullivan,  
18 Felleman, F-E-L-L-E-M-A-N.  
19 Q. And how long have you been married?  
20 A. Since 1987, so we're talking, let's see, that's 30  
21 -- over 30 years, right?  
22 Q. I won't make you do the math. You are close.  
23 A. Thirty-two years.  
24 Q. What does your spouse do?  
25 A. She's a professor.

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1 Q. Where does she teach?

2 A. University of South Carolina.

3 Q. Have you been married previously?

4 A. No.

5 Q. Do you have any children who are 18 years or older

6 who live in the Midlands region?

7 A. We have two children over 18 but neither lives in

8 the Midlands region.

9 Q. Do you have any family over the age of 18 who live

10 in the Midlands of South Carolina?

11 A. No.

12 Q. Do you attend a church in the area?

13 A. No.

14 Q. Are you involved in any civic organizations?

15 A. Civic organizations? I guess I'd have to say no.

16 Q. Are you part of --

17 A. No, not official. I mean I --

18 Q. Okay.

19 A. -- I'm involved in a lot of things in the arts but

20 yeah, like the museum and so forth, but you know.

21 Q. Are you part of any professional organizations?

22 A. Yes.

23 Q. And which professional organizations are you a

24 member of?

25 A. I'm a member of the College Art Association; I'm a

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1 member of the National Council of Arts  
2 Administrators, I'm a member of the board of  
3 directors of that latter group, I'm a secretary to  
4 the board; I'm a member of the German Studies  
5 Association, and I believe that's all.

6 Q. Do you use any social media sites?

7 A. Do I -- I can't hear you.

8 Q. Use any social media sites?

9 A. Yes.

10 Q. What social media sites do you use?

11 A. Facebook, Instagram, Twitter.

12 Q. Have you posted, commented or messaged or otherwise  
13 communicated on any of your social media sites  
14 about Allison Dunavant, David -- or David Voros?

15 A. Not that I can remember. I don't think so.

16 Q. Where did you go to high school?

17 A. Amherst Regional High School, Amherst,  
18 Massachusetts.

19 Q. And what is your highest level of education?

20 A. Ph.D.

21 Q. In a narrative fashion, can you tell me where you  
22 went to school after high school and what degree  
23 you received from each school?

24 A. Yes, I can. Out of high school, I went to Cornell  
25 University where I received a bachelor's degree in

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1                   art history. After that, I studied one year in  
2                   Germany at the Albert-Ludwigs-Universität in  
3                   Freiburg im Breisgau.

4                   COURT REPORTER: Great.

5                   THE WITNESS: If you want, I'll write it down for you.

6                   COURT REPORTER: I'm just -- no, it's --

7                   A. I didn't get any degree there except a certificate  
8                   in German language. I studied then at the City  
9                   University of New York Graduate Center where I  
10                   earned a, what they call, a -- well, I earned a  
11                   Ph.D. there but prior to that, they give you a  
12                   master's in phil, master of philosophy. It was  
13                   only a Ph.D. program, you don't get a -- an MA  
14                   prior to the Ph.D. there, but they give you a  
15                   master's of philosophy when you've completed all  
16                   your requirements except the Ph.D. dissertation.  
17                   So that's -- that's all.

18                   Q. All right. Are you currently employed?

19                   A. Yes.

20                   Q. And where are you employed?

21                   A. University of South Carolina.

22                   Q. And what is your current position?

23                   A. Professor of art history.

24                   Q. And who supervises you?

25                   A. Laura Kissel.

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1 Q. When did you first start at the University of South  
2 Carolina?

3 A. I was hired in August of 2012.

4 Q. And what was your position when you were hired?

5 A. Professor of art history to become chair of the  
6 Department of Art as of January 1, 2013. I'd had a  
7 research leave the first semester I was on the  
8 faculty.

9 Q. When you were professor in August of 2012, who was  
10 your supervisor at that point in time?

11 A. Would have been Brad Collins since he was interim  
12 chair of the art department. Bradford Collins.

13 Q. Then once you became chair of the department, who  
14 were you reporting to?

15 A. Dean Mary Anne Fitzpatrick, dean of the College of  
16 Arts and Sciences.

17 Q. And how long were you the chair of the department?

18 A. Five years. I became -- when I was hired, just to  
19 clarify "chair of the department," we're big on  
20 nomenclature in academia, when I was hired, it was  
21 the Department of Art which has a chair. We then  
22 transitioned to become the School of Visual Art and  
23 Design, I believe in the spring of 2014, and then  
24 my title changed to director of the School of  
25 Visual Art and Design. It's basically the same

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1                   duties but just a different nomenclature. You call  
2                   the chief -- chief administrator of a school a  
3                   director, chief administrator of a department is a  
4                   chair.

5   Q.   And then you stepped down from your, I guess,  
6                   director position at that point in 2018?

7   A.   I served through December of 2017, so it was five  
8                   calendar years, 2013, '14, '15, '16, '17. So in --  
9                   yeah.

10   Q.   Prior to coming to work at the University of South  
11                   Carolina, where else have you worked in the  
12                   academic world?

13   A.   I was at Southern Illinois University Carbondale  
14                   and prior to that, I was at Adelphi University.  
15                   And those were my full-time jobs. Prior to that, I  
16                   had part-time jobs as a graduate student.

17   Q.   And what was your position at Adelphi?

18   A.   Assistant professor of art history.

19   Q.   And what was your position at SIU?

20   A.   First I was associate professor of art history,  
21                   then I became -- then I was professor of art  
22                   history, and director of the School of Art and  
23                   Design.

24   Q.   Have you ever been terminated from any employment?

25   A.   No. I'm trying to think back to high school. I

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1           don't think so.

2   Q.    I'm less concerned about --

3   A.    No.

4   Q.    -- your high school jobs.

5   A.    No.  Oh, yeah -- well, I wasn't exactly terminated.

6           I'm trying to answer everything very truthfully.

7   Q.    I understand.

8   A.    During book rush, I was working at the bookstore at  
9           Cornell a year after I graduated, I wouldn't say I  
10          was terminated, but he had to hire -- there were  
11          two of us working and he hired the other guy and  
12          not me.  He told me, "Okay, you can't work here  
13          anymore."

14   Q.    Have you ever received any formal disciplinary  
15          action from the University of South Carolina?

16   A.    No.

17   Q.    Have you ever received any formal disciplinary  
18          action from anywhere else you have worked in the  
19          academic sector?

20   A.    No, I have not.

21   Q.    While you were the director of the School of Visual  
22          Art and Design, did you have any employees who  
23          reported directly to you?

24   A.    Yes.

25   Q.    Okay.  Which positions reported to you?

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1 A. Basically, everyone in the school. The faculty,  
2 full-time, part-time; the staff, which consists of  
3 five or six people.

4 Q. And who was the dean of the College of Visual -- or  
5 sorry, of the College of Arts and Sciences when you  
6 were the director of the School of Visual Art and  
7 Design?

8 A. First of all, it was Mary Anne Fitzpatrick, who was  
9 the dean who hired me, and then Lacy Ford, who's  
10 the current dean.

11 Q. Do you recall when Lacy Ford started?

12 A. I couldn't give you the exact date. I think it's  
13 2016 or '17. It was late in my being the director.

14 I know he was the director the last year. I mean  
15 he was the dean the last year that I was the  
16 director, but I'm not sure the exact date.

17 Probably began -- so I ended end of 2017, he would  
18 have been dean that fall and probably the academic  
19 year before that.

20 Q. Okay. Did you provide evaluations to the faculty  
21 and staff that you supervised?

22 A. Yes, to the full-time faculty. One of the  
23 director's duty is to do an annual review letter of  
24 the full-time faculty, as well as do an evaluation  
25 of staff, full-time staff.

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1 Q. Is the annual review process the same for tenured  
2 faculty and non-tenured faculty?

3 A. Yes. Well, yeah. Tenured, you're talking about  
4 people who are on the tenure track versus people  
5 who are already tenured?

6 Q. Yes.

7 A. Yes.

8 Q. Okay. Are you responsible for who is employed as  
9 an adjunct within the School of Visual Art and  
10 Design? I apologize. Were you while you were the  
11 director?

12 A. Yes.

13 Q. Did you make hiring and firing decisions as to  
14 adjunct faculty as the director?

15 A. The director has to sign hiring paperwork, so yes.  
16 Firing, I'm not sure. Because probably we wouldn't  
17 use that term, to fire, fire someone. Non-  
18 reappointment can occur.

19 Q. Were you involved in non-reappointment decisions?

20 A. Yeah. Yes.

21 Q. Did you have any hiring or firing abilities with  
22 regard to faculty in the School of Visual Art and  
23 Design?

24 A. Hiring? You mean all of the faculty?

25 Q. Yes.

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1 A. Can you repeat the question?

2 Q. Yes. In your capacity as director of the School of

3 Visual Art and Design, did you have the authority

4 to hire or fire faculty?

5 A. It's kind of a complicated question. The authority

6 to hire or fire? I wouldn't say that you have sole

7 -- and, again, it depends upon what type of faculty

8 you're talking about. And in terms of --

9 Q. Let's start with --

10 A. -- hiring --

11 Q. -- non-tenured and --

12 A. In terms of hiring, the process of hiring a tenure

13 track faculty, let alone a tenured faculty member,

14 involves many, many people. The director makes --

15 there's a -- there's a search committee and the

16 search committee makes a recommendation to the

17 director and the director makes a recommendation to

18 the dean. And it's ultimately the dean who would

19 hire a tenured faculty member in the School of

20 Visual Art and Design. The -- the director doesn't

21 really have that authority.

22 Q. So as the director, you make a recommendation?

23 A. Exactly.

24 Q. Did you make recommendations to hire faculty while

25 you were the director of the School of --

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1 A. Yes.

2 Q. -- Visual Art and Design? Did you ever make a  
3 recommendation to terminate any employee while you  
4 were the director of the School -- in the School of  
5 Visual Art and Design?

6 A. No.

7 Q. Are you aware of what the process is to terminate a  
8 tenured faculty member?

9 A. No, I'm not really. I mean --

10 Q. In your capacity as director, did you have the  
11 ability to provide disciplinary action to any  
12 tenured faculty?

13 A. Not to my knowledge.

14 Q. If there was an issue with a tenured faculty member  
15 within the School of Visual Art and Design, where  
16 would you go? What would be your first step?

17 A. What would --

18 MR. GESSNER: Object to the form. Please answer the  
19 question.

20 THE WITNESS: Pardon?

21 MR. GESSNER: Please answer the question.

22 A. Oh. It would depend upon -- you said an issue,  
23 right?

24 Q. Yes.

25 A. It would depend upon the issue.

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1 Q. If you receive student complaints about a tenured  
2 faculty member, what is the process for handling  
3 student complaints?

4 A. Again, it depends upon the complaint.

5 Q. Okay. In your position of director -- while you  
6 were in the position of --

7 A. Uh-huh.

8 Q. -- director, how often did you interact directly  
9 with students?

10 A. I also taught classes, so often. Probably every  
11 day.

12 Q. Would you agree that the safety of students is a  
13 high priority for the University?

14 A. Yes, I would.

15 MR. GEISSNER: Object to the form.

16 Q. Are you aware of whether or not you are a mandatory  
17 reporter under Title IX?

18 A. I was, yes.

19 Q. Are you currently a mandatory reporter under Title  
20 IX?

21 A. I believe we are. Well, I believe as state  
22 employees, we are.

23 Q. And what's your understanding of what a mandatory  
24 reporter under Title IX is?

25 A. That there are certain complaints that could be

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1                   made to you that you are required to report to the  
2                   appropriate offices at the University.

3           Q.    What types of complaints would you be required to  
4                   report?

5           A.    Ones in which the complaint -- complainee thinks  
6                   there's a physical danger to her, his or their self  
7                   or that someone is going to do damage to  
8                   themselves, issues of sexual harassment, things  
9                   that could endanger, yeah, could provide a -- yeah,  
10                  endanger people. That's my understanding.

11          Q.    And who are the appropriate offices to make those  
12                  reports to?

13          A.    Well, if there's an issue of -- in terms of the  
14                  first thing I was talking about, you know, where  
15                  someone thinks there's physical danger to  
16                  themselves, if someone else is going to do harm,  
17                  you need to report it to the campus police. If  
18                  they think that person is in danger of doing harm  
19                  to themselves, there's an office of like mental  
20                  health that you need to report it to. Issues of  
21                  sexual harassment to the EOP office. That's my  
22                  understanding. We had a chart that would say, you  
23                  know, which different offices you would report  
24                  different complaints to, and I always -- and I  
25                  would consult that chart.

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1 Q. You trained on the Title IX procedures at the  
2 University?

3 A. Yes, I believe so. I mean I think we had to look  
4 at, you know, some kind -- you know, PowerPoints  
5 that told us the different procedures.

6 Q. Since you've begun at the University in 2012, can  
7 you recall how many times you've received Title IX  
8 training?

9 A. No, I can't recall.

10 Q. Can you recall when you first met David Voros?

11 A. When I was a candidate to be chair of the art  
12 department when I came on my campus visit. So that  
13 would have been in the spring of 2012.

14 Q. How often, if at all, would you have the  
15 opportunity to observe Mr. Voros's work product?

16 A. His work product; is that what you said?

17 Q. Yeah.

18 A. You mean his paintings?

19 Q. I guess I should rephrase. I apologize. How often  
20 would you have the opportunity to evaluate  
21 Professor Voros as a professor?

22 A. When I was director, all the full-time faculty get  
23 a once a year annual review.

24 Q. And how did you put together that annual review?

25 A. Faculty file an annual achievement report with the

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1 school, so you review that as well as their student  
2 evaluations of their teaching, which the director  
3 gets, and any peer evaluations of their teaching  
4 that might have been conducted in that year. Those  
5 would be the basic components. Yeah, those are the  
6 components.

7 Q. Would you personally evaluate any of the teaching  
8 that took place?

9 A. What do you mean by personally evaluate?

10 Q. Did you ever sit in on any of Professor Voros's  
11 classes?

12 A. No.

13 Q. Have you ever received any student complaints about  
14 Professor Voros?

15 A. Yes.

16 Q. When do you recall first receiving complaints about  
17 Professor Voros?

18 A. I really couldn't tell you when.

19 Q. When you started with the University, was Professor  
20 Voros already a tenured faculty member?

21 A. Yes.

22 Q. As the director for the School of Visual Art and  
23 Design, what role did you have in selecting  
24 programs for School of Visual Art and Design study  
25 abroad programs?

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1       A. For study abroad programs, the director, I believe,  
2           I'm trying to remember the process, would have to  
3           approve that that -- actually, it's -- it's a --  
4           it's a tough question in terms of University of  
5           South Carolina because there are a number of  
6           different kinds of study abroad programs so there's  
7           no kind of one word or one package answer for it.  
8           Could you repeat the question?

9       Q. Yes. As the director for the School of Visual Art  
10           and Design, how were you involved in selecting  
11           programs for study abroad programs for the School  
12           of Visual Art and Design?

13      A. Seems to me, I'm just trying to remember that, I  
14           was not involved in selecting study abroad programs  
15           for the School of Visual Art and Design.

16      Q. Did you have any duty in approving school -- study  
17           abroad programs?

18      A. I'm trying to think whether we had any self-  
19           standing School of Visual Art and Design study  
20           abroad programs and to the best of my knowledge, we  
21           really didn't.

22      Q. Did you have to approve courses that were taught  
23           abroad that gave credit within the School of Visual  
24           Art and Design?

25      A. Yes.

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1 Q. Did you ever visit any of the study abroad  
2 locations personally?

3 A. Yes.

4 Q. And where did you visit?

5 A. I went to Monte Castello di Vibio.

6 Q. And when did you visit Monte Castello?

7 A. Would have been the summer of -- again, I'm not --  
8 I think it was either 2014 or '15. My wife and I  
9 went there for a couple of days when we were on  
10 vacation.

11 Q. Did you visit as a part of a USC organized trip?

12 A. No. As I said, we were on vacation.

13 Q. Was there a study abroad program occurring when you  
14 visited?

15 A. Not a University of South Carolina one. I think  
16 when we were there, a group from Maryland College  
17 of Art and Design showed up.

18 Q. Were you visiting anyone in particular in Monte  
19 Castello?

20 A. Well, I saw David Voros and Pam Voros.

21 Q. Was there anyone else from USC present in Monte  
22 Castello when you visited?

23 A. I don't think there was anyone at that time who was  
24 affiliated with USC at that time.

25 Q. Okay. And what can you recall about your visit to

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1                   Monte Castello?

2       A.    It was a nice, small town. Village, really, on top  
3                   of a hill.

4       Q.    Did you drive within the village?

5       A.    There's really hardly any traffic in the village so  
6                   we parked. We did have a rental car and we parked  
7                   sort of when you enter the village and then it was  
8                   all walking.

9       Q.    Did you stay in the village for your trip?

10      A.    Yes.

11      Q.    And where did you stay?

12      A.    In an apartment.

13      Q.    Was the apartment part of the International Center  
14                   for the Arts facilities?

15      A.    No.

16      Q.    And you drove to and from the town?

17      A.    Yes.

18      Q.    Did you see a train station while you were in the  
19                   town?

20      A.    No.

21      Q.    Do you recall if you saw any bus stations while you  
22                   were in the town?

23      A.    I don't recall.

24      Q.    Can you recall when you first met Allison Dunavant?

25      A.    I don't know exactly when it was. If I -- when I -

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1           - I probably met her when she first became a  
2           graduate student, maybe at the first meet and greet  
3           that we always have at the beginning of the year  
4           when the new graduate students come in, but I don't  
5           remember. Could have been then.

6   Q.    Do you recall when you first found out that Allison  
7           was having problems in Italy?

8   A.    Yes.

9   Q.    And when was that?

10   A.   I saw -- when she was there, I saw a post by her on  
11           Facebook.

12   Q.    Can you recall what type of post you saw on  
13           Facebook that indicated she was having problems?

14   A.    Yes.

15   Q.    Can you tell me what that post was?

16   A.   It was about missing the train connection when she  
17           was -- that she had missed the train connection.

18   Q.    Were you friends with Allison on Facebook at this  
19           point in time?

20   A.   I must have been if I saw it. I think so. I'm not  
21           sure, but I think so.

22   Q.    At some point, did the University alert you that  
23           there were problems occurring in Italy?

24   A.    Yes.

25   Q.    Do you recall who notified you?

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1 A. Not exactly, no.

2 COURT REPORTER: This is going to be 62.

3 (Plaintiff's Exhibit Number 62 was marked for  
4 identification purposes.)

5 Q. You were just handed what's been marked as Exhibit  
6 Number 62, Mr. Chametzky, and this is an email that  
7 was sent May 16th of 2016. Have you ever seen this  
8 email before?

9 A. I don't think so. I'm not -- I'm not copied on it.

10 Q. The last paragraph or sentence of the email says,  
11 "Peter Chametzky needs to be involved."

12 A. Correct.

13 Q. Does May 16th or around that time sound like when  
14 you had first found out from faculty that there  
15 were issues in Italy?

16 A. I didn't find out from faculty. Like I said, the  
17 first I saw there was some issue was something on  
18 Facebook. Then I was probably contacted by someone  
19 who's on this email.

20 Q. Sorry, I apologize. I'll re-ask. What -- does  
21 this timing sound like the first time a faculty  
22 member would have reached out to you, around May  
23 16th?

24 A. I'm not sure what you mean by a faculty member.

25 Q. Someone from --

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1 A. Do you mean these people --

2 Q. -- the university.

3 A. -- who are here?

4 Q. Just anyone from the university as opposed to

5 Allison's Facebook post?

6 A. Anyone at the university?

7 Q. Yes.

8 A. So the people who are listed on this email?

9 Q. Yeah.

10 A. Could be. It was probably a little bit later than

11 that. It probably didn't happen May 16th but yeah.

12 Q. Do you know if the university alerted you to these

13 issues while Allison was still in Italy?

14 A. I don't know.

15 Q. Do you recall, in any way, being involved in the

16 actions to get Allison home from Italy?

17 A. No, I don't.

18 Q. Now, after Allison returned from Italy, do you

19 recall meeting with her at all?

20 A. No.

21 Q. Have you ever sat down to discuss with Allison what

22 occurred in Italy?

23 A. No.

24 Q. What's your understanding of what occurred in

25 Italy?

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1 A. That she and David had a falling out.

2 Q. Have you ever had any conversations with David  
3 about what happened in Italy?

4 A. Very generally.

5 Q. And what can you recall David telling you about  
6 Italy?

7 A. Basically, that things Allison was alleging,  
8 charging, whatever, weren't true.

9 Q. Okay. Did you followup with anybody at the  
10 university what those allegations were?

11 A. What do you mean by followup?

12 Q. David tells you these things Allison is saying  
13 aren't true --

14 A. Uh-huh (affirmative response).

15 Q. -- did you talk to anybody else about what he was  
16 alleging Allison was accusing him of?

17 A. What he was alleging Allison was accusing him of?  
18 The first I -- I really saw or heard in any of  
19 these conversations with David would have been  
20 subsequent to my seeing the letter from the EOP  
21 office saying that certain charges have been filed  
22 against faculty member David Voros and we're going  
23 to look into it. And it was probably -- and David  
24 would have gotten that letter at the same time and  
25 I think subsequent to that he, you know, came and

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1           saw me probably and said, you know, "This is not  
2           true."

3   Q.    Okay.

4   A.   And I wouldn't have followed up with EOP to see,  
5           you know -- no.

6   Q.    Were you notified when a no contact order was  
7           issued?

8   A.   That was in that letter.

9   Q.    And did you have to take any actions, as the  
10           director, to make sure the no contact order was  
11           abided by?

12   A.   Yes.

13   Q.    And what action did you have to take?

14   A.   Saying to David, "We both understand this is the  
15           situation, no contact," and then assuring -- doing  
16           whatever we could to assure that Allison would be  
17           able to take her courses, you know, move forward in  
18           her degree.

19   Q.    Are you aware of what degree Allison was seeking?

20   A.   Master of fine arts.

21   Q.    And did she have a concentration with that master  
22           of fine arts?

23   A.   In the School of Visual Art and Design, people  
24           declare concentrations -- you're smiling because  
25           you've probably heard this before -- people declare

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1           concentrations but they all get a master of fine  
2           arts.

3       Q.    Do you know what Allison's concentration initially  
4           was?

5       A.    I believe it was painting.

6       Q.    And are you aware of who the graduate level  
7           professors are who teach painting courses for  
8           University of South Carolina?

9       A.    Yes.

10      Q.    And who are they?

11      A.    David Voros is and Pam Bowers-Voros would also  
12           teach on the graduate level at times. I think most  
13           of her teaching was not graduate.

14      Q.    Are there any other professors who teach graduate  
15           level painting courses at the university?

16      A.    Not -- no, not that I know of. It's possible it  
17           could happen. If you have an MFA, if you have the  
18           right qualifications, a part-time person could  
19           teach those.

20      Q.    So are you aware of whether or not Allison was able  
21           to complete her painting courses with the  
22           university?

23      A.    Best of my knowledge, she did.

24      Q.    Are you aware of whether or not Allison took any  
25           graduate level painting courses after the no

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1 contact order was issued with David?

2 A. I don't know.

3 (Plaintiff's Exhibit Number 63 was marked for  
4 identification purposes.)

5 COURT REPORTER: Sixty-three.

6 MS. ALBRECHT: Thank you, Christine.

7 Q. All right. You've been handed what's been marked  
8 as Exhibit Number 63. Have you seen this letter  
9 before?

10 A. Yes.

11 Q. The first paragraph, second sentence, says, "The  
12 complainant's main concern at this point is fear of  
13 retaliation." Did you take any actions, as the  
14 director, to make sure that David would not be able  
15 to retaliate against Ms. Dunavant?

16 A. That's difficult to answer because how can you take  
17 an action? The action would be to say, "We both  
18 understand the content of this letter, which says  
19 you can't retaliate."

20 Q. Were you made aware of any complaints that David  
21 was trying to retaliate against Allison?

22 A. Yes. A complaint was made to me.

23 Q. Who made that complaint?

24 A. Jaime Misenheimer.

25 Q. Do you recall when she made that complaint?

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1 A. No.

2 Q. And can you recall what the complaint was?

3 A. She said that David had told her to get -- give

4 Allison a bad grade in the independent study course

5 she was doing with Jamie.

6 Q. Did you have any conversations with Professor Voros

7 about that complaint?

8 A. I don't think so.

9 Q. Were you made aware that Ms. Dunavant had made a

10 complaint about a grade she received from David

11 after her complaint?

12 A. I don't remember. It's possible, but I don't

13 really remember. Though, she wouldn't -- after the

14 complaint, she wouldn't have been taking a course

15 with him. That's why I'm a little confused.

16 Q. Sorry. About a class she would have taken the

17 spring semester, prior to going to Italy, but the -

18 -

19 A. Oh.

20 Q. -- grade came out summer of 2016?

21 A. I may have heard something about that. It's hard

22 to recall.

23 Q. Did Jamie Misenheimer ever have any other

24 complaints about Professor Voros that she brought

25 to your attention?

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1 A. I'd have to say yes.

2 Q. What other complaints did she bring to your  
3 attention?

4 A. I'm trying to remember. There were -- there was --  
5 there were some issues between them in terms of  
6 when she was the technical support person in the  
7 painting area and he wasn't happy with her  
8 performance there. And in a sense, I tried to  
9 mediate and say, "Okay. Are you doing this? Are  
10 you doing that?"

11 Q. Did any other faculty members bring you complaints  
12 regarding Professor Voros?

13 A. Did any other faculty members bring complaints to  
14 me --

15 Q. Yes.

16 A. -- regarding --

17 Q. Faculty or staff?

18 A. -- Professor Voros? Yes.

19 Q. And who are those faculty or staff members?

20 A. I couldn't remember who exactly.

21 Q. Did Professor, let me see if I can say all these  
22 names right, Virginia Scotchie ever bring any  
23 complaints to your attention?

24 A. About Voros?

25 Q. Yes.

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1 A. I don't think so. No, not that I remember.

2 Q. Did Pam Bowers ever bring any complaints to you

3 about David Voros?

4 A. Yes.

5 Q. And what complaints did Ms. Bowers bring you?

6 A. There were issues with she felt like he was going

7 into her office without asking. She -- I can

8 recall her also complaining him going into the

9 painting studio when she was teaching classes in

10 there. Those are basically the ones I remember.

11 Or kind of impinging upon her professional space.

12 Q. Do you recall a no contact order being issued

13 between Ms. Bowers and Mr. Voros?

14 A. No, I don't.

15 Q. Do you recall a no contact order being issued

16 between Ms. Misenheimer and Mr. Voros?

17 A. No.

18 Q. Would you have been made aware of no contact orders

19 as the director of the School of Visual Art and

20 Design?

21 A. If I were the director, I would think I would be.

22 Q. Can you recall --

23 A. Oh.

24 Q. -- oh, go ahead.

25 A. I'm not sure. Yeah, I -- I don't know. I -- I

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1           really don't remember.

2       Q.    Can you recall any other no contact orders being  
3            issued regarding Mr. Voros?

4       A.    No, I don't recall any others.

5       Q.    As the director for the School of Visual Art and  
6            Design, did you have to sign off on a professor's  
7            ability to teach a graduate level course?

8       A.    No.

9       MS. ALBRECHT:   Let's take a quick break.

10      (Off the Record from 10:53 a.m. until 11:08 a.m.)

11     BY MS. ALBRECHT:

12       Q.    Mr. Chametzky, I don't know if I asked you this  
13            before, but is there a reason you stepped down from  
14            your position as director of the School of Visual  
15            Art and Design?

16       A.    Yeah.

17       Q.    And what is that reason?

18       A.    I wanted to get back to my research. I had done  
19            nine years at that point as a school director or  
20            chair, so it was time to get back to research.

21       COURT REPORTER:   This is 64.

22      (Plaintiff's Exhibit Number 64 was marked for  
23            identification purposes.)

24       Q.    Mr. Chametzky, have you ever seen this before?

25       A.    Yeah, that's my handwriting.

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1 Q. Okay. And the date at the top says Tuesday,  
2 October 18, 2016. Would that be when you wrote  
3 this?

4 A. Probably.

5 Q. And then you said you wrote this so I might have to  
6 yield to you on what some of this handwriting --

7 A. It's my handwriting.

8 Q. -- says. Yes. But I'm going to do the best that I  
9 can with it. Here it says, "On Friday, October  
10 14th, I became aware that Dr. Voros wanted to hire  
11 Alex Miller to teach Arts 234."

12 A. Correction. "Professor Voros." P-R.

13 Q. Oh, okay.

14 A. He's not a doctor.

15 Q. Sorry.

16 A. He's an MFA, not a Ph.D.

17 Q. I've got you. No, that's my reading of --

18 A. That's okay.

19 Q. -- the letters. Thank you. As the director, did  
20 you have to approve of the hiring of Alex Miller?

21 A. Yes.

22 Q. Okay. As of October of 2016, was Alex Miller  
23 already teaching at the University?

24 A. I don't think so, no.

25 Q. Are you aware of whether or not she had taught in

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1                   the past?

2       A.   Yes, she had.

3       Q.   And then the next part references, "Given that Ms.  
4                   Miller played a prominent role in the complaint  
5                   filed by a student." What was your understanding  
6                   of the role that Ms. Miller played in Ms.  
7                   Dunavant's complaint?

8       A.   Basically, intermediary between David and Allison.

9       Q.   The next page references that you consulted with  
10                  Carl Wells of EOP and Henry Wright, Assistant  
11                  University Counsel?

12      A.   Associate, I think that says.

13      Q.   Okay. And then do you recall consulting with Carl  
14                  Wells and Henry Wright?

15      A.   I recall that I did, as it says here.

16      Q.   Do you recall anything specific about your  
17                  conversations with Carl Wells or Henry Wright about  
18                  the hiring of Alex Miller?

19      A.   Basically, what it says here; that I probably told  
20                  them that this was his wish and that I didn't think  
21                  it was a good idea at this point and what was their  
22                  take on it.

23      Q.   Okay. And then do you recall informing Professor  
24                  Voros of that decision?

25      A.   I don't recall specifically. I would think I

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1                   probably did.

2   Q.    Okay.  The --

3   A.    But that wasn't a decision at that point, that was  
4                   really opinions on -- on my part, as well as on the  
5                   two gentlemen I consulted with.

6   Q.    Okay.  The bottom of the second page of Exhibit 64,  
7                   it says, "I informed Dr. Voros of my decision on  
8                   Tuesday, October 18th via email."

9   A.    Yeah.

10   Q.    "With offer to discuss it with him"?

11   A.    Uh-huh.

12   Q.    Is that what that says?

13   A.    That's what it says, yes.

14   Q.    Okay.  I just want to make sure I have my  
15                   translation correct as well.

16   A.    I apologize for my handwriting.

17   Q.    No, mine is just as bad.  And then it says he  
18                   called soon thereafter.  Do you recall having a  
19                   phone call with Professor Voros about --

20   A.    Again, I don't recall --

21   Q.    -- the hiring?

22   A.    -- the specific phone call but I would stand by  
23                   whatever I wrote here; that's why I wrote it.

24   Q.    Okay.  All right.  This references that Professor  
25                   Voros stated he would be suing you?  Sorry, it's at

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1                   the bottom of --

2   A.    "He stated he would be suing me."  That's what it  
3                   says, yeah.

4   Q.    Okay.  If you wrote that, was that a part of your  
5                   phone conversation?

6   A.    It must have been something that he said to me over  
7                   the phone, yeah.

8   Q.    And then after it says, "He stated he would be  
9                   suing me," can you help me with what it says?

10   A.    "The office of EOP, the University."

11   Q.    After that, it says, "He stated he could and should  
12                   have had Ms. Dunavant imprisoned in" --

13   A.    "Perugia."

14   Q.    Thank you.  "In the same prison as Amanda Knox"?

15   A.    Yes.

16   Q.    Okay.  If you put quotations around the "the same  
17                   prison as Amanda Knox," would that be a direct  
18                   quote you were writing down?

19   A.    That's how I interpret it.

20   Q.    Okay.  And then can you help me with what it says  
21                   on the rest of this?

22   A.    I can read, if you want.

23   Q.    I would greatly appreciate that so I don't --

24   A.    "He accused me" --

25   Q.    -- keep butchering it.

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1 A. -- "of making 'a shambles' of the 'department,  
2 school, college' or whatever it is. Excoriated my  
3 'visionary leadership.' At times, he seemed  
4 incoherent evolving into a tantrum."

5 Q. Okay. Did you tell anyone else at the University  
6 about this conversation?

7 A. I don't -- I don't recall having done that at the  
8 time. I can qualify that in one way.

9 Q. Okay.

10 A. That you asked me about my wife previously --

11 Q. Yes.

12 A. -- who I said is a professor at the University. I  
13 may well have told her. Though, I will qualify  
14 that, too. At the time that I was director, I  
15 often did not tell her things that were going on  
16 and different conversations. Certainly not  
17 conversations having to do with many of our  
18 colleagues. I don't know whether I -- I couldn't  
19 guarantee that I didn't mention it --

20 Q. Okay. Did you have any --

21 A. -- to my wife.

22 Q. Okay.

23 A. But I don't think anyone else.

24 Q. Did you have any concerns with the fact that  
25 Professor Voros was comparing Ms. Dunavant to

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1                   Amanda Knox in that phone call?

2       A. Since I put it in here, I'd say it must have stood  
3                   out in my mind.

4       Q. Okay.

5       A. Although, I would also qualify that. That being a  
6                   professor, I try to be careful with language and as  
7                   I'm sure you do, too, as a lawyer. You said  
8                   comparing her to Amanda Knox; that's not exactly  
9                   how I would interpret what I wrote there.

10      Q. Did you have any concerns about him making the  
11                   comment that he should have had a student of the  
12                   University of South Carolina imprisoned in the same  
13                   prison as --

14      A. He didn't say he should have, he said he could  
15                   have, I believe. Let me -- or -- or am I wrong?  
16                   What did I write?

17      Q. "He could and should have had" --

18      A. "He could and should." Yeah, I did -- I did have a  
19                   concern and that's why I think I wrote that down.

20      Q. Okay. But with the exception of possibly talking  
21                   to your wife about it, you don't recall bringing  
22                   that concern to anybody at the University?

23      A. No, I don't.

24      (Plaintiff's Exhibit Number 65 was marked for  
25                   identification purposes.)

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1 Q. Sixty-five.

2 A. Oh, is it in here? Ah, I did. You've got it.

3 Q. All right. Have you ever seen this before?

4 A. Yes, I have.

5 Q. Okay.

6 A. I wrote it.

7 Q. All right. Can you explain why this was written?

8 A. I wanted to memorialize as best I could both for

9 myself what had gone on up to this time, then I

10 wanted to inform the dean's office so this was

11 written in order to give to the office of the dean

12 of the College of Arts and Sciences.

13 Q. Do you recall who you gave it to?

14 A. Yes. That would be the associate dean, Cynthia

15 Davis, who's -- there are two or three associate

16 deans in the College of Arts and Sciences, her

17 bailiwick is humanities, arts and maybe social

18 sciences, too. And anyway, yes, I gave it to her.

19 Q. All right. Did you have any follow-up meetings

20 with her after you provided this to her?

21 A. I believe I brought this to her and, you know, she

22 read it and that was basically our meeting. I

23 don't think I had any follow-up meetings with her

24 but I don't -- I don't recall.

25 Q. All right. And if you need to sit down and reread

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1                   this, you can. But to the best of your knowledge,  
2                   is everything that you provided in Exhibit 65 true?

3   A.    True? You're right, I would have to read it very  
4                   carefully. I think it reflects what I had  
5                   experienced and/or heard to that time. Whether  
6                   those things are absolutely true isn't something  
7                   that I can really, you know, judge.

8   Q.    Okay. Where did you receive the information that  
9                   Professor Voros had demanded that Ms. Dunavant  
10                  vacate the premise and threatened to have her  
11                  thrown in jail if she did not? That's at the top  
12                  of the second page, if you want to reference it.

13   A.    Wait a minute. "He demanded she vacate the  
14                  premises and threatened to have her thrown in jail  
15                  if she did not." The threatened to throw in jail  
16                  comes from that phone conversation.

17   Q.    Okay.

18   A.    The vacating the premises, I believe, initially  
19                  came from the complaint that Allison filed with  
20                  EOP.

21   Q.    Okay.

22   A.    I think she -- I believe, I don't remember it that  
23                  specifically, but I think it said in there that he  
24                  had told her that she had to vacate the premises.

25   Q.    Were you provided with a copy of Ms. Dunavant's EOP

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1 | complaint?

2 | A. Yes.

3 Q. Were you provided with a copy of Ms. Misenheimer's  
4 EOP complaint?

5 A. No, I don't think so. Which complaint do you mean  
6 by her? I'm not sure what complaint you're talking  
7 about because I'm -- sorry.

8 Q. No, you're fine. At this point in time, have you  
9 been -- were you provided with any of Ms.  
10 Misenheimer's EOP complaints?

11 | A. I don't think so.

12 Q. Okay.

13 A. I don't think I remember any.

14 Q. Do you recall how you were first informed that  
15 Misenheimer had complained that Voros instructed  
16 her that she had to find a reason to give Ms.  
17 Dunavant a bad grade?

18 A. Well, she told that to me.

19 Q. Okay.

20 A. And -- yeah.

21 Q. Was Ms. Misenheimer the one who informed you that  
22 Professor Voros and Alex Miller were in a  
23 relationship, as well?

24 A. I don't think so.

25 Q. Okay. Where did you first find out that Ms. Miller

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1 and Mr. Voros were engaged in a relationship?

2 A. You know, it was never actually confirmed to me, as  
3 it says in this document that I wrote. There were  
4 rumors around the school.

5 Q. Do you recall when you first started hearing those  
6 rumors?

7 A. So this is May 16th. Probably, since this is dated  
8 May 16, 2016, that is Exhibit 62, probably would  
9 have been in the fall. Probably sometime in the  
10 fall when people had returned to school.

11 Q. Okay.

12 A. Probably.

13 Q. Do you believe it was in 2016?

14 A. Well, if it was the fall --

15 Q. The year all of this occurred?

16 A. -- if it was the fall, yeah, that would be fall of  
17 2016.

18 Q. Were you made aware of any campus police reports  
19 made against Professor Voros?

20 A. No. As it says in here, they -- they told -- I was  
21 told by Jamie that they had gone to the police but  
22 I don't think I got any kind of official statement  
23 of that.

24 (Plaintiff's Exhibit Number 66 was marked for  
25 identification purposes.)

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1       COURT REPORTER: That's 66.

2       Q.     Okay. I handed you what's been marked as Exhibit  
3                   Number 66. Is this your handwriting, as well?

4       A.     Yes, it is.

5       Q.     Okay. I'm going to start my first question. Can  
6                   you read to me what these say just so I make sure I  
7                   have that correct?

8       A.     Okay. The one at the top dated 3/2/17 says, "Phone  
9                   call from Pam Bowers-Voros. 'I served papers on  
10                   David last week (Friday). He responded that he had  
11                   seen Jamie (Misenheimer) 'talking to students' in  
12                   her office, threatened to have her fired.'"

13      Q.     Okay. Did David have hiring and firing powers over  
14                   Ms. Misenheimer?

15      A.     Through the director.

16      Q.     So that would be through you?

17      A.     Yes.

18      Q.     Okay. Was that a recommendation he would give to  
19                   you?

20      A.     Yes.

21      Q.     Okay. All right. And then the next note that  
22                   says, April 10, 2017.

23      A.     April 10, 2017. "Voros, after receiving the letter  
24                   from Carl Wells, calls me threatening to take legal  
25                   action against me because it's 'a bunch of crap, my

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1 word against hers.'" And those were -- that last  
2 two lines are in quotation marks.

3 Q. Okay. Would this be a separate occasion that Mr.  
4 Voros is threatening legal action from Exhibit  
5 Number 64?

6 A. Exhibit 64 was this one, which is dated October 18,  
7 2016. This one's dated April 10, 2017, so I would  
8 assume it's a separate occasion.

9 Q. Did you ever talk to anyone at the University, with  
10 the exception of what you provided in Exhibit 65,  
11 regarding Professor Voros's threats to sue you or  
12 the University?

13 A. I don't remember. I really don't.

14 Q. All right. And then can you read that bottom note  
15 card dated August 10th?

16 A. 8/10. "Phone call from D. Voros from Italy.  
17 Incensed about J. Misenheimer still being employed.  
18 Says he is going to provost/dean. Telling graduate  
19 school to end painting. Disparaging media arts,  
20 Laura Kissel, which has no relation to issue."

21 Q. Okay. Did you ever have any personal concerns  
22 about Jamie Misenheimer's teaching at the  
23 University?

24 A. Yes.

25 Q. Okay. And what concerns did you have?

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1 A. There was a semester where she had very, very bad  
2 student evaluations and she was teaching in the  
3 program called "On Your Time," which is a separate  
4 administrative unit from the College of Arts and  
5 Sciences.

6 Q. All right. Do you recall what semester that was?

7 A. No.

8 Q. Okay. Is Jamie Misenheimer still employed with the  
9 University?

10 A. I don't know. She may be. I -- I don't know.

11 Q. Did you ever take action to, I guess you had said  
12 not terminate but not reassign her or rehire her?

13 A. We did not rehire her for one class but did hire  
14 her for another class.

15 (Plaintiff's Exhibit Number 67 was marked for  
16 identification purposes.)

17 COURT REPORTER: That's 67.

18 Q. Okay. You've been handed what's been marked as  
19 Exhibit Number 67. Do you recall receiving this  
20 letter?

21 A. I don't recall specifically receiving it. It looks  
22 quite familiar.

23 Q. If you received a letter like the one marked  
24 Exhibit 67, would you forward these student  
25 concerns on to anyone at the University?

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1 A. No.

2 Q. Is this something that you would have talked to

3 Professor Voros about directly?

4 A. Yes.

5 Q. This particular letter is signed "concerned

6 students." If you knew who the students were, is

7 there somewhere else you would refer them to to

8 make complaints?

9 A. That's very conjectural.

10 Q. Okay.

11 A. I'm sorry. If I knew who they were --

12 Q. Is there a specific --

13 A. -- because there are a lot of different --

14 Q. -- office?

15 A. When I say that, that's very -- there are a lot of

16 different, you know, contingencies there. If there

17 were students who I knew, had some relationship

18 with, I might talk to them. If they're students I

19 didn't know, I -- I don't know. To refer them?

20 Not -- not that -- not for this kind of complaint

21 particularly.

22 Q. Okay. Let me see if I can ask you a better -- for

23 complaints such as those referenced in Exhibit

24 Number 67 --

25 A. Yes.

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1 Q. -- are you the appropriate avenue for students to  
2 talk to?

3 A. Yeah.

4 Q. Okay.

5 A. Yes. I'm sorry.

6 (Plaintiff's Exhibit Number 68 was marked for  
7 identification purposes.)

8 COURT REPORTER: Sixty-eight.

9 Q. You've been handed what's been marked --

10 A. Got it.

11 Q. -- as Exhibit Number 68. Is this your handwriting?

12 A. Yes.

13 Q. Okay. This is the last one with your handwriting.

14 A. Uh-huh.

15 Q. Could you read this note to me?

16 A. "Discussion with," redacted, "March 23, 2017, in  
17 office. October." So I think that must refer to  
18 something had happened in October. "Touching.

19 Voros grabbed her and kissed her. Not on mouth.

20 Subsequently," something "her" -- "ignores her."

21 "Subsequently, ignores her." I'm sorry. Difficult  
22 for me, too. "Last Friday," gave her, it says,  
23 "extravagant praise." So I believe the student  
24 said that Voros praised her extravagantly.

25 "Richard Spivey. Richard, a model, made

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1                   inappropriate sexual comment. Richard goes to  
2                   party at Jaime's, follows her around. Senior."  
3                   And then, "Sexual victims of," blank blank.

4   Q.    Okay. Did you report this student discussion to  
5                   EOP?

6   A.    No.

7   Q.    Did you refer the student to EOP?

8   A.    I assume that I told the student that if she had a  
9                   complaint, we needed to report it to EOP.

10   Q.    Do you recall if you brought this complaint to  
11                   anyone else's attention?

12   A.    Brought this complaint to anyone else's attention?  
13                   That's what you said?

14   Q.    Yes.

15   A.    I don't think so.

16   Q.    Are you aware of whether or not Richard Spivey  
17                   continued as a model at the University?

18   A.    I am aware.

19   Q.    Okay.

20   A.    That he did not because I fired him.

21   Q.    Okay. Did you fire him as a result of this  
22                   complaint?

23   A.    Yes.

24   (Plaintiff's Exhibit Number 69 was marked for  
25                   identification purposes.)

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1 COURT REPORTER: Sixty-nine.

2 Q. You've been handed what's been marked as Number --  
3 as Exhibit 69, which is an email that went to you  
4 in addition to others. Do you recall receiving  
5 this email?

6 A. You know, I don't recall receiving it but I must  
7 have.

8 Q. During the spring 2017 semester, would Jamie  
9 Misenheimer -- who would she report to?

10 A. Both to David Voros and to the director.

11 Q. Did you need to take any specific action, once a no  
12 contact order was put in place, with regard to Ms.  
13 Misenheimer and who she would report to?

14 A. Probably.

15 Q. Do you recall who she reported to instead of Dr. ...

16 A. No, I don't --

17 Q. -- or Professor Voros?

18 A. -- I don't recall, but it probably -- I'm just --  
19 probably to the director, but I --

20 Q. Do you recall any problems occurring in the  
21 department, while Ms. Misenheimer and Professor  
22 Voros were both teaching in the department, with  
23 the no contact order in place?

24 A. That's a big -- any problems within the school,  
25 there --

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1 Q. With Ms. Misenheimer and Professor Voros. I  
2 apologize.

3 A. I don't recall, after this, there being specific  
4 issues.

5 Q. Okay. Do you know a Scott Clifford? Or sorry, a  
6 Clifford Scott?

7 A. Clifford Scott? Was he a student worker? I don't  
8 -- I don't. Clifford Scott?

9 Q. He was cc'd on some of your emails so I was just  
10 asking if you knew him personally. If you don't --

11 A. Oh.

12 Q. -- that's okay. I only can ask you about what you  
13 know.

14 A. Oh, he's on this one. No, I don't know who --

15 Q. Okay.

16 A. -- who -- who that is. I mean this was sent from  
17 Carl Wells and it's cc'd to a Scott, Clifford. I  
18 don't know who that is.

19 Q. Do you recall what the result was of Ms. Dunavant's  
20 complaint?

21 A. Yeah, in general terms.

22 Q. Okay. And what was the result?

23 A. That they found that her complaint -- my  
24 understanding was they found that the complaint was  
25 not convincing.

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1 Q. Okay. And do you recall what the result was of Ms.  
2 Misenheimer's complaint?

3 A. No.

4 Q. Okay. Exhibit Number 64 is the notes that  
5 reference the hiring of Alex Miller. Was Alex  
6 Miller ultimately hired at the University?

7 A. Yes.

8 Q. Okay. Can you recall what semester she was hired?

9 A. No, but you're saying -- do I have this exhibit  
10 here?

11 Q. This is what we just --

12 A. Oh, that.

13 Q. -- talked about but I don't know --

14 A. This is going on in the fall of 2016 so I -- maybe  
15 it was -- I don't know. It would -- would have  
16 either been the spring of '16 or the fall of '17,  
17 but I -- I'm not sure at this point.

18 (Plaintiff's Exhibit Number 70 was marked for  
19 identification purposes.)

20 COURT REPORTER: That's 70.

21 Q. You've been handed what's been marked as Exhibit  
22 Number 70. Do you recall receiving this email?

23 A. No, but it's to me so I -- I don't recall this  
24 specific email coming in.

25 Q. Did you receive complaints such as the one in

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1 Q. Okay. Looking specifically to the second page  
2 under the subsection "Service" --

3 A. Yes.

4 Q. -- it references, "You served the university by  
5 coordinating USC in Italy in summer 2016." Are you  
6 aware of whether or not Professor Voros coordinated  
7 the USC in Italy program as a professor of the  
8 University of South Carolina or as the owner and  
9 director of the International Center for the Arts?

10 A. I believe the latter.

11 Q. Okay. If he coordinated the USC in Italy trip as  
12 his -- in his capacity as the director and owner of  
13 the International Center for the Arts, is there a  
14 reason it's a part of his USC annual review letter?

15 A. Service often encompasses things that are done  
16 outside of your university duties. For instance, I  
17 was asked earlier whether I'm a member of any  
18 professional organizations and I said I'm on the  
19 board of the National Council of Arts  
20 Administrators. That counts towards my national  
21 service.

22 Q. Do you receive compensation for being --

23 A. No.

24 Q. -- on that board? Are you aware of whether or not  
25 Mr. -- Professor Voros received compensation for

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1                   coordinating the USC in Italy program?

2       A. Well, my understanding is he, you know, he runs  
3                   that school and they are a, what they call, a  
4                   service provider for international programs. So as  
5                   I mentioned before, when my wife and I visited  
6                   there, a group from Maryland College of Art and  
7                   Design showed up. They would have been paying a  
8                   fee to the International Center for the Arts to  
9                   have their courses there. And that's my  
10                  understanding is what USC did also.

11      Q. Okay. In the next section where it says summary --

12      A. Uh-huh.

13      Q. -- it says -- it mentions Professor Voros's role as  
14                  director of the International Center for the Arts  
15                  and just after that says, "At times, though, this  
16                  role can conflict with your duties at USC." Can  
17                  you recall specifics on when --

18      A. The next line does that.

19      Q. Okay.

20      A. The next two lines.

21      Q. Where it says, "In 2016 you remained in Italy,  
22                  without any school authorization, until August 24"?

23      A. Yes.

24      Q. Okay. Are there any other times you can think of  
25                  where Professor Voros's role as director and -- and

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3 A. Not specifically.

4 Q. Were you aware, prior to Ms. Dunavant's complaints,  
5 that Professor Voros was bringing students over to  
6 the International Center for the Arts outside of  
7 the USC in Italy program?

8 A. The students who worked there, is that what you  
9 mean?

10 Q. Yes.

11 A. Yes.

12 Q. And your understanding is those students were  
13 employed by the International Center for the Arts?

14 A. Yes.

15 Q. Are you aware of whether or not those students  
16 received any compensation?

17 A. Don't know.

18 Q. Did you have any concerns about conflicts of  
19 interest with Professor Voros bringing students  
20 over to Italy?

21 A. Conflicts of interest? I mean, as it says in the  
22 end here, a -- that, "In the summer of 2016, you  
23 had a serious conflict with one of our students,"  
24 which is what we're talking about here. "This led  
25 to that student filing a complaint against you."

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1           And then urging him to make it more specific what  
2           those students' role is and he had -- he had been  
3           told, you know, to work with the legal counsel to  
4           make it a more formal relationship.

5       Q.    Did any of your other faculty members, when you  
6           were the director of the School of Visual Art and  
7           Design, independently employ students of the  
8           University of South Carolina?

9       A.    Not to my knowledge but it's possible.

10      Q.    To your knowledge, is Professor Voros still  
11           employed with the University?

12      A.    Yes.

13      Q.    Are you aware of what his position is?

14      A.    He's professor of studio art.

15      MS. ALBRECHT: Let me take one more break real quick.

16                   (Off the Record from 11:49 a.m. until 11:58 a.m.)

17      BY MS. ALBRECHT:

18      Q.    I just have a -- well, it might be a couple of  
19           questions about one part of Exhibit Number 65.

20      A.    Okay.

21      Q.    Let me find it. Sorry, I should have tried to put  
22           those in order for you. All right. On the second  
23           page --

24      A.    Uh-huh.

25      Q.    -- second paragraph --

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1 A. Yeah.

2 Q. -- there's a section that says, "The president's  
3 intervention, precipitated by Voros, who has hosted  
4 him in Monte Castello, effectively trumped  
5 Chametzky's authority." Can you tell me what  
6 you're talking about there?

7 A. I had thought, and you probably read about this,  
8 that Voros and I had a difference of opinion as to  
9 whether it was a good idea to hire Alex Miller at  
10 that time. I thought no; he thought yes. After  
11 the resolution of Allison's complaint, the  
12 president called me and said, "It's okay to go  
13 ahead and hire the person you want to hire."

14 Q. Okay. That section continues on and it says, "In a  
15 decision he regrets, and in order to placate Voros  
16 in the short run" --

17 A. Yeah.

18 Q. -- "and in the hope it would not lead to further  
19 action by or against Dunavant in the long run, gave  
20 in to Voros's vehemently pressed demand. In the  
21 current situation, it is likely that Voros will  
22 again turn to the president for support." What is  
23 the current situation that's referenced there?

24 A. I am not sure.

25 Q. Okay.

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1 A. I wrote this a long time ago. I'm really not sure.

2 Q. Okay. To your knowledge, did Professor Voros and  
3 President Pastides have a close relationship?

4 A. I'm not -- I don't know whether it was really a  
5 close relationship. I know that President Pastides  
6 went to Monte Castello.

7 Q. Okay. And then here it references Voros going to  
8 the president for support.

9 A. Uh-huh.

10 Q. Was Voros going above you to President Pastides in  
11 this situation?

12 A. Yes.

13 Q. Okay. Did you have other faculty members who were  
14 going above you to the president when they had  
15 conflicts?

16 A. It's possible.

17 Q. Any that you were aware of?

18 A. And not to the president. You know, there are  
19 different levels there; there's a dean, there's a  
20 provost, there's a president. I'm not aware of  
21 other situations. Yeah, I'm not aware.

22 Q. Are you aware of whether or not Professor Voros  
23 went to the president or the dean with regard to  
24 his conflicts with you?

25 A. Am I aware of it?

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1 Q. Yes.

2 A. That was my impression at the time, as I wrote  
3 here.

4 Q. Okay. I don't have any other questions for you.  
5 These guys all may. I don't know where you guys  
6 want to start.

7 A. Thank you.

8 Q. Thank you.

9 MR. WLODARCZYK: I just have a few.

10 EXAMINATION

11 BY MR. WLODARCZYK:

12 Q. Sir, my name is Daniel Wlodarczyk. I introduced  
13 myself to you when we began. I represent Professor  
14 Voros. Just a few questions. Prior to this  
15 lawsuit being filed, were you aware of any  
16 allegations by Ms. Dunavant against Professor Voros  
17 regarding inappropriate sexual advances?

18 A. No, I wasn't.

19 Q. Same question with regard to any allegations by Ms.  
20 Dunavant against Professor Voros for any touching  
21 whatsoever?

22 A. No.

23 Q. Were you aware, prior to this lawsuit, of any  
24 allegations that Professor Voros imprisoned Ms.  
25 Dunavant while she was staying in Italy?

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1 A. Prior to?

2 Q. Prior to the lawsuit.

3 A. The information that I had prior to the lawsuit was

4 from the EOP complaint and I don't remember the

5 exact content of that, but it seemed to have

6 complaints, I don't know if it used the word

7 "imprisoned," but that was -- she was complaining

8 there about the living and working conditions and

9 so forth --

10 Q. Okay.

11 A. -- so.

12 Q. So anything that you had with regard to that issue

13 would be contained in the EOP complaint?

14 A. Yeah, exactly. Yes. I'm sorry.

15 Q. Okay. Do you recall if you received student

16 complaints prior, regarding Professor Voros, prior

17 to the May Italy trip that Ms. Dunavant attended?

18 A. Complaints?

19 Q. Correct.

20 A. I'd have to check these. I was handed some about

21 things about tardiness and missing classes and that

22 was an issue that arose and I may well have, you

23 know, had that kind of complaint prior to May of

24 2016.

25 Q. Okay. And I believe the complaints that we

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1                   discussed today are all dated, so presumably those  
2                   dates will speak for themselves. But as we sit  
3                   here today, can you actually recall any complaints  
4                   being made by students prior to the May 2016 trip?

5       A. I can't recall specific ones.

6       Q. Okay. Can you recall any specific complaints made  
7                   against Professor Voros by any faculty or staff  
8                   member prior to May of 2016?

9       A. Again, the time frame is difficult to pin down as  
10                  to when I might have heard a complaint.

11      Q. Okay. As we sit here today, do you have any  
12                  independent recollection of one being made prior to  
13                  May 2016?

14      A. No.

15      Q. Have you ever given Professor Voros what, in your  
16                  opinion, would be considered a negative annual  
17                  evaluation?

18      A. I don't think so. I'd have to -- I think I -- all  
19                  the evaluations are on the record there but yeah.

20      MR. WLODARCZYK: Okay. That's all the questions I have.

21                   EXAMINATION

22      BY MS. TOWLE:

23      Q. Good afternoon. My name is Monica Towle. I  
24                  represent the International Center for the Arts.  
25                  You mentioned that you went with your wife to

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1           Italy.

2   A.    Uh-huh.

3   Q.    Did you actually visit the facility for the  
4           International Center for the Arts --

5   A.    Yes.

6   Q.    -- when you were there?

7   A.    Yes.

8   Q.    What was the condition of the facility when you  
9           were there?

10   A.   They were -- it was, I'd say, fair to good. They  
11           were in the process of getting ready. I went  
12           fairly early. They were in the process of getting  
13           ready for, you know, different groups to be coming.

14   Q.   Did you --

15   A.   I'd have to qualify that saying, you know, the --  
16           the main building where the meals were served and  
17           everything was lovely. I saw, you know, some of  
18           the spaces where people would be living and studios  
19           and they -- they were -- they looked -- they looked  
20           good, you know, though they needed a little  
21           cleaning up.

22   Q.   Do you have any personal knowledge of the events  
23           that happened at the International Center for the  
24           Arts while Ms. Dunavant was there?

25   A.   No.

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1 Q. Any personal knowledge?

2 A. No.

3 Q. You mentioned that you relied on her complaints and  
4 that -- her EOP complaint to form your knowledge of  
5 those events. Did you rely on anything else?

6 A. No.

7 Q. Prior to this lawsuit, did you have any knowledge  
8 of any complaints of assault and battery?

9 A. No.

10 Q. Those are all the questions I have. Thank you.

11 A. Thank you.

12 EXAMINATION

13 BY MR. GESSNER:

14 Q. Quickly, Dr. Chametzky. I just have a few  
15 questions. I want to clarify a few things so I'm  
16 going to bounce around from topic to topic and I do  
17 apologize for that. I believe you had spoke with  
18 Ms. Albrecht earlier about graduate students that  
19 get an MFA degree having concentrations. Back when  
20 Ms. Dunavant was a student, was it a requirement  
21 that MFA students have a concentration?

22 A. I don't think so.

23 Q. Okay. So to the best of your knowledge, is it safe  
24 to say that a student could graduate, get an MFA,  
25 and not have a concentration?

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1 A. Yes.

2 Q. Okay. If a student does have an MFA and has a  
3 concentration in something like painting, how would  
4 anyone else know that?

5 A. Only if they look at their transcript and saw that  
6 they took a lot of painting classes.

7 Q. Okay. So there's nothing printed on the degree  
8 itself?

9 A. Not -- my understanding is they all say MFA in  
10 studio art or media -- well, we don't have an MFA  
11 in media arts. Go on.

12 Q. So the degree itself does not mention anything  
13 about any concentration?

14 A. No.

15 Q. Okay. Does having a concentration in a particular  
16 area affect someone's employability when they have  
17 an MFA?

18 A. That's a complicated question. It could. And it's  
19 one -- as I said, I'm involved with professional  
20 organizations. It's one of the things we discuss  
21 all the time; is it preferable to have a  
22 concentration or is it preferable not. Many  
23 programs across the country have eliminated  
24 specializations in order to make sure that people  
25 have a broader education. And just kind of it's

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1 more in tune with contemporary notions of artistic  
2 production is that people will say, oh, I'm an  
3 artist. I may be working in video though I like to  
4 paint, too. So, anyway, it's a long academic  
5 answer to a question that it could. It would  
6 depend upon -- you were saying employability?

7 Q. Yes, sir.

8 A. I would say across the board, no. It could -- it  
9 could have an affect on employability in some  
10 particular program where there might be a  
11 preference for one type of person versus another  
12 and it could go many different ways.

13 Q. Okay.

14 A. Whether you'd rather have someone who just  
15 concentrated on ceramics or you'd rather have  
16 someone who's more broadly employable.

17 Q. Okay. It's my understanding that Jamie Misenheimer  
18 informed you that David Voros had told her to give  
19 Allison Dunavant a bad grade; is that correct?

20 A. That's correct.

21 Q. Okay. And you then contacted EOP; is that correct?

22 A. We were in a meeting and I said, "Jamie, that's --  
23 there's a no," what do you call it, "retaliation  
24 clause. If he did that, that's retaliation. We  
25 need to report that." And yeah, we did, right then

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1 and there. Called the EOP office, put her on  
2 speaker phone.

3 Q. Okay. And do you recall when that occurred in  
4 relation to the incident where David allegedly told  
5 Ms. Misenheimer to give her the bad grade? Was it  
6 --

7 A. Oh.

8 Q. -- close in time or did Jamie not tell anybody  
9 about that for several months?

10 A. I couldn't put the timeline together. I -- I don't  
11 know --

12 Q. Okay.

13 A. -- the exact time relationship there.

14 Q. And I believe you had said that there were some  
15 issues with Ms. Misenheimer teaching at least one  
16 course; is that correct?

17 A. Yes.

18 Q. Okay. Do you recall if those issues arose prior to  
19 Ms. Misenheimer raising any complaints about  
20 Professor Voros?

21 A. I don't recall whether it was before she raised  
22 complaints about him or not. I do recall that it  
23 seemed to me that problems she was having were  
24 related to this whole situation.

25 Q. What do you mean by that?

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1 A. Well, that there had been a complaint filed against  
2 Voros, that there were a lot of tensions in that  
3 particular area of the school that, yeah, were not  
4 productive for her.

5 Q. Okay. Earlier you had discussed a student making a  
6 complaint that Professor Voros had kissed her; is  
7 that correct?

8 A. That was in one of the exhibits that was given to  
9 me, yeah.

10 Q. Okay. And I believe, according to my notes, that  
11 was Exhibit 68. If you want to take a look at it,  
12 please feel free to do so.

13 A. Right.

14 Q. Where did Professor Voros kiss this student  
15 supposedly?

16 A. She told me on the cheek.

17 Q. Okay. Did you ask the student if she felt this was  
18 sexual harassment?

19 A. Yes.

20 Q. And what was her response?

21 A. No.

22 Q. Did you tell the student that she could or should  
23 make an EOP complaint if she felt she was harassed?

24 A. Yes.

25 Q. To the best of your knowledge, did the student file

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1                   an EOP complaint?

2       A.    No.

3       Q.    Okay. And did you not contact EOP yourself because  
4                   the student indicated it was not sexual harassment?

5       A.    True.

6       MS. ALBRECHT:   Object to the form.

7       Q.    That's fine. You discussed with Ms. Albrecht the  
8                   hiring of Alexandra, I think you called her Alex  
9                   Miller, but she goes by Alex Stasko now; is that  
10                  correct?

11      A.    My understanding -- she was Alex Miller at that  
12                  time, she had been Alex -- she -- yeah, I think  
13                  Miller was her married name and I don't think she's  
14                  married anymore.

15      Q.    Okay.

16      A.    That's my understanding, but I'm not sure.

17      Q.    So if I talk -- if I mention Alex Stasko, though,  
18                  we're talking about the same person?

19      A.    I'll understand who you mean, yeah.

20      Q.    Okay.

21      A.    I know.

22      Q.    Thank you. Now, you talked about her being hired.  
23                  Other than her being involved, more or less, with  
24                  Allison Dunavant's EOP complaint, do you have any  
25                  other concerns with Alex Stasko working for the

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1 A. No. No.

2 Q. It does not?

3 A. No.

4 Q. Okay. You said "not specifically," so I wanted to  
5 know -- I was going to ask you if it had any  
6 relation to him generally.

7 A. Well, generally, the person in that had -- was a  
8 student of his --

9 Q. Okay.

10 A. -- and a graduate student so.

11 Q. Okay. But as far as the events depicted --

12 A. No.

13 Q. -- in Act 2?

14 A. No.

15 Q. Okay.

16 A. And there was never -- never anything said to me  
17 that -- of his being involved in any of that at  
18 all.

19 Q. Okay. That's all the questions I have. Thank you.

20 A. Thank you.

21 MS. ALBRECHT: I have a couple more for you. Sorry.

22 THE WITNESS: Okay.

23 REEXAMINATION

24 BY MS. ALBRECHT:

25 Q. When you started at the University of South

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1                   Carolina, Professor Voros already -- was already a  
2                   tenured professor; is that correct?

3                   A. Yes.

4                   Q. Were you made aware of any complaints that were  
5                   made about Professor Voros from the beginning of  
6                   his employment with the university up through 2012  
7                   when you started?

8                   A. No.

9                   Q. Did you have access to the faculty tenure votes for  
10                   Professor Voros?

11                  A. Probably, if I had looked for it, I would have, but  
12                  I -- I never did.

13                  Q. Were you ever aware that professors had described  
14                  him as confrontational, argumentative and  
15                  dismissive of his colleagues?

16                  A. Is this coming from his tenure and promotion --

17                  Q. Yes.

18                  A. Those are -- I shouldn't editorialize, but tenure  
19                  and promotion, to us, is a really kind of  
20                  important, sacred things and making those kinds of  
21                  comments I would consider pretty inappropriate in a  
22                  tenure and promotion thing. But no, I wasn't aware  
23                  of -- to answer your question --

24                  Q. Okay.

25                  A. -- I was not aware of any of that. Never seen it,

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1 never heard that.

2 Q. Have you ever been made aware of any complaints  
3 that Professor Voros showed erratic behavior?

4 A. My own complaints.

5 Q. Okay. Any from any other -- others at the  
6 university?

7 A. Well, other things that are mentioned in these  
8 documents.

9 Q. Are you aware of whether or not MFA students are  
10 required to have a concentration at the University  
11 of South Carolina currently?

12 A. No, I'm not -- I don't know.

13 Q. Okay. You were asked a moment ago if you thought  
14 Ms. Stasko was a qualified teacher. Have you ever  
15 heard any reports that Ms. Stasko was having issues  
16 with drug use?

17 A. No, I never heard --

18 MR. GEISSNER: Object to the form.

19 THE WITNESS: Oh.

20 MR. GEISSNER: Please answer the question.

21 THE WITNESS: Pardon?

22 MR. GEISSNER: Please answer the question. I was just  
23 entering an objection.

24 A. I never heard that, no.

25 Q. Okay. I don't have anymore questions for you.

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1 A. Thank you.

2 (There being no further questions, the deposition concluded  
3 at 12:20 p.m.)

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PETER M. CHAMETZKY

1

## CERTIFICATE

2

Be it known that I, Christine A. Cortright, do  
hereby certify that Peter M. Chametzky appeared before me  
and I took the foregoing deposition at the time and place  
aforesaid by means of stenomask with backup; that I was  
then and there a notary public in and for the State of  
South Carolina and that by virtue thereof, I was duly  
authorized to administer an oath; and that the witness was  
by me first duly sworn to testify to the truth, the whole  
truth, and nothing but the truth.

7

I further certify that the foregoing transcript  
represents a true, accurate, and complete transcript of  
said deposition. This transcript may contain quoted  
material; said material is transcribed as read or quoted by  
the speaker.

10

I further certify that pursuant to Federal Rule  
30(f)(1), a review of this deposition was requested.  
Should the signature of the witness not be affixed to the  
deposition, the witness shall not have availed  
himself/herself of the opportunity to sign.

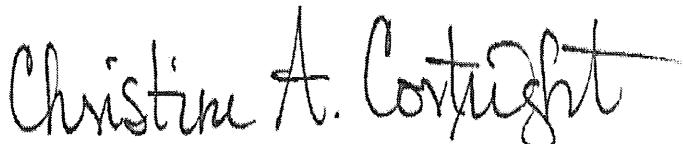
13

I further certify that I am neither employed by nor  
related to any of the parties in this matter nor their  
counsel; nor do I have any interest, financial or  
otherwise, in the outcome of this action.

15

Witness my hand and seal this 18th day of August,  
2019.

17



18

Christine A. Cortright  
Notary Public for South Carolina  
My Commission Expires: 08/16/2026

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**GRUDZINSKI-HALL, MAGDALENA**

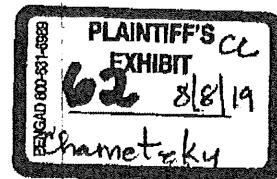
**From:** MILLER, ALLEN  
**Sent:** Monday, May 16, 2016 12:42 AM  
**To:** SAWYER, ROGER; FORD JR., LACY  
**Cc:** GRUDZINSKI-HALL, MAGDALENA  
**Subject:** MFA Student in Italy

Dear Roger and Lacy

I have become aware of a situation concerning one of our MFA students in Italy with David Voros. The mother has contacted us and characterized the situation as abusive. Magdalena will contact you with the facts. I am in Oman and 8 hours ahead. We need to move quickly. Peter Chametzky needs to be involved.

Allen

Paul Allen Miller  
Vice Provost, Director of International Affairs Carolina Distinguished Professor of Classics and Comparative Literature  
University of South Carolina



19

Office of Equal Opportunity Programs

Dunavant v. Voros



Equal Opportunity Programs

August 3, 2016

DAVID VOROS  
 Sent electronically to VOROS@MAILBOX.SC.EDU

## PERSONAL AND CONFIDENTIAL

Regarding Case Number: 2015021302

Dear Dr. Voros,

The Office of Equal Opportunity Programs has received your request to resolve the previous matter reported to us by Alison Dunavant. The Complainant's main concern at this point is fear of retaliation. As of such, please be apprised that you are to not contact the Complainant or talk with her about this matter.

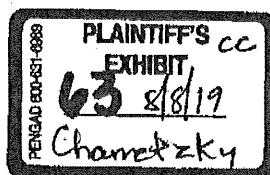
Further, any resolution or mediation much be entered into and agreed upon by both parties. We are meeting with the Complainant this morning to discuss the resolution with her. Again, please know that resolution/mediation is contingent upon both parties agreeing to the terms.

In addition to the resolution of this matter, the Office of Equal Opportunity Programs will work with the Office of the General Counsel to explore what safe guards must be put in placed to ensure that you, the University, and our students are not put in similar situations again in the future.

I will be in touch with you after we meet with the Complainant. If you have any questions, please contact me @ (803) 777-9560 or [wellscr@mailbox.sc.edu](mailto:wellscr@mailbox.sc.edu).

Sincerely,

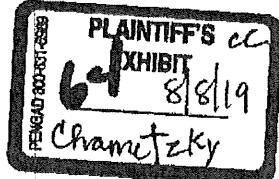
Carl R. Wells  
 Asst. Dir. EOP



CC: Joan Gabel, Provost, University of South Carolina  
 Dr. Andrew Graciano, Director of Graduate Studies, School of Visual Art & Design  
 Dr. Allen Miller, Office of the Provost  
 Dr. Peter Chametzky, Director, Visual Arts and Design  
 Henry White, University Lawyer

Tuesday Oct. 18, 2016 11:30  
am

On Friday Oct. 14 I  
became aware that Pr.  
Voros worked to hire  
Alex Miller for records MR73237.  
Given that Ms. Miller  
plays a prominent role  
in the complaint filed  
by a student, Alison  
Dunavant, against Voros,  
I thought at the present  
time, this was probably



not a good idea. I consulted with Carl Wells of EOP and Henry White, Assoc. Under Comm. Council, who has been dealing with the complaint. Both advised against it.

I informed Dr. Vos of my decision on Tuesday, Oct. 18, via email, with offer

to discuss it with  
him.

He called soon  
thereafter, obviously  
very agitated. Much  
of what he said had  
no connection to this  
decision, but amounted  
to ad hominem attacks  
on me and on the  
University. He stated he  
would be seeing me, no

Office of EOP, the  
University. He stated  
he could and should  
have had his Democrat  
impassioned in Pennsylvania,  
in "the same position as  
Amanda Knox." He accused  
me of making "a shambles"  
of the "department, school,  
(college)" or whatever  
it is. Exonerated my  
"visionary leadership." At

times be seened

incoherent, devolving  
into a fantasm.

March 23, 2017  
*Peter Chametzky*

Problems In Painting

Dramatis Personae

Pam Bowers-Voros, Senior Instructor, estranged wife of David Voros

Peter Chametzky, Professor, Director, SVAD

[REDACTED] USC senior, painting

Alison Dunavent, 2<sup>nd</sup> year MFA student, painting and drawing

Alexandra Miller, tfac in figure drawing, MFA alumna, ceramics

Jaime Misenheimer, tfac in painting and alumna (BA/BFA)

Harris Pastides, President, USC

Richard Spivey, former model in figure classes

[REDACTED] MFA student in painting, alumnus (BFA) and [REDACTED]

Charleston, SC

David Voros, Professor, painting

Carl Wells, USC EOP officer

[REDACTED] 1<sup>st</sup> year MFA student, painting

Henry White, USC Office of General Council

Act 1: Voros

In addition to his duties as a Professor of Art Studio in the USC SVAD, David Voros is the owner of an independent art school in Italy, the International Center for the Arts in Montecastello di Vibio, in Umbria. He and his wife, Bowers-Voros, spend their summers there, hosting groups of teachers and students from a variety of institutions, and often teaching USC summer classes there. They are scheduled to do so this summer. The situation here described renders that a questionable plan.

Voros often employs USC students there in support roles—cleaning, preparing studios, purchasing supplies, helping to serve meals, etc. To my knowledge, they are unpaid, but receive international transportation, and room and board in exchange for their labor. In summer 2016 Alison Dunavent was one such student. She filed an EOP complaint against Voros, claiming that living conditions were far below what



had been promised, the workload far above what had been indicated, and that Voros had been personally abusive. For his part, after their working relationship had soured, and she was awaiting her return to the US (arranged by the USC Study Abroad Office), he demanded she vacate the premises and threatened to have her thrown in jail if she did not. He said to Chametzky in a phone conversation of October 14, "I could and should have had her put in the same prison as Amanda Knox" [in Perugia]. Mr. Wells investigated this case, and with Mr. White brought it to resolution. A key issue was how Dunavent would complete needed course work, in that the resolution of the issue involved a cessation of any contact between Voros and Dunavent. Misenheimer offered to teach Dunavent the required course she needed, taught by Voros, as an independent study.

Misenheimer recently stated to Chametzky that during this period, Voros instructed her that she had "to find a reason to give Dunavent a bad grade"—which would be a clear violation of the no retaliation policy in such cases. Chametzky informed her of this, and put her in contact with Mr. Wells. In the course of conversations with Misenheimer, deeper and even more troubling issues emerged. Misenheimer claims, as do numerous SVAD students, faculty, and staff, that Voros had entered into an intimate relationship with Miller prior to the arrival of his wife in Italy. This is the reason for Bowers-Voros to have filed for divorce. Miller, at Voros's insistence, and despite a background in ceramics, was hired to teach figure drawing this semester. Chametzky believed this was a bad idea at this time, as Miller, while not a party to the Dunavent complaint, was referred to hostilely in it. The President's intervention, precipitated by Voros (who has hosted him in Montecastello), effectively trumped Chametzky's authority. In a decision he regrets, and in order to placate Voros in the short run, and in the hope it would not lead to further action by or against Dunavent in the long run, gave in to Voros's vehemently pressed demand. In the current situation, it is likely that Voros will again turn to the President for support. In his intensive lobbying to hire Miller (at that time resident in Chicago), Voros never mentioned having an intimate relationship with her. Counsel White has stated that he suspected this might be the case. Chametzky rues his own lack of insight into the structure of narrative and into human psychology. The general supposition in the SVAD is that it was in fact Dunavent who came upon Voros and Miller *in flagrante delicto*. Voros has denied having an affair with Ms Miller to one faculty member (Bradford Collins) who has questioned him about it. It has been asserted to Chametzky by numerous other parties, including [REDACTED] who claims to have questioned Bowers-Voros on this matter.

Misenheimer (as well as [REDACTED], has submitted an affidavit supporting Bowers-Voros's divorce case. While it is as yet sealed, she fears for her personal safety if and when Voros reads it. Having been told this, and at the suggestion of Legal Counsel White, Chametzky advised her to report her fears to Campus Police. She has done so, and has an officer assigned to her to work on a safety plan. An officer currently walks through McMaster College each morning, establishing a law enforcement presence. Chametzky met also with [REDACTED] on March 23, 2017. She stated that she had accompanied Misenheimer to Campus Police. She also reported to

Chametzky that she, too, was present at Montecastello in summer 2016, and witnessed amorous activity between Voros and Miller. During the campus closure in October 2016, she attended a party at Voros and Bowers-Voros's house. On arrival, she states that Voros, who she judged to be under the influence of alcohol and perhaps other substances, grabbed her and kissed her (not on the mouth), in a way that was different from any interaction they had had previously, that she found inappropriate, and that made her very uncomfortable. She stated that she has felt uncomfortable being around Voros all year. That he has basically been absent, giving her no critical feedback on work—until this past Friday, when he gave her extravagant praise. However, he also gave instructions to a male model, Richard Spivey, who in the past had made sexual comments to her, that made her very uncomfortable, and left her alone with that model. Informed of the model's behavior by [REDACTED] on 3/23, Chametzky signed termination papers for him and informed him by phone that he would no longer be employed by SVAD.

Numerous reports, including the attached, have attested to erratic, unprofessional behavior on the part of Voros this semester. Numerous students feel alternately intimidated or neglected. Bowers-Voros has complained of his entering her office, and classroom, uninvited. She is currently on a medical leave for 17 days, for reasons derived from this stressful situation.

Act 2: [REDACTED]

In addition to being an MFA student, [REDACTED] is [REDACTED] He has hired USC students to work there as models. According to Misenheimer, one recently confided to her that she had fallen asleep there subsequent to the modeling session, and when she woke up, Mr. [REDACTED] was, without her consent, fondling and kissing her. According to Misenheimer, she had the same experience with Mr. [REDACTED] two years ago. At that time, her husband was battling colon cancer. For that reason, she did not confide this sexual assault to him or to anyone. Her husband died this past year. When Misenheimer reported these charges regarding [REDACTED] to Chametzky on March 20 or 21, he immediately put her into contact with Mr. Wells, who instructed her as to the report she was obligated to make on behalf of the student, as an employee and responsible party at USC. She is currently gathering more information from two students who have confided in her about their experiences with Mr. [REDACTED] and preparing the report (one is [REDACTED] [REDACTED] a current student at USC). When Mr. Wells receives this, he will initiate an investigation. A talented and dedicated painter, [REDACTED] completed two years towards his BFA at the [REDACTED] before transferring to USC to complete his undergraduate studies. He subsequently gained admission to the MFA program. As stated above [REDACTED]

3/2/17

Phone call from Paul Poros  
Poros.

"I served papers on David  
last week (Friday). He responded  
that he had seen Samie  
(Mitschenkow) 'talking to students'  
in his office. Threatened  
to have her fired."

April 10, 2017

Poros, after receiving my  
letter from Carl Wells, calls  
me, threatening to file  
legal action - or against  
me, because it's "a bunch  
of crap" - "my word  
against hers"

8/10 Phone call from Dr. Poros

from Italy. Informed about  
Z, about S. Mitschenkow still  
being employed.

- says he is going to  
Poros & Deau
- telling Graduate School  
to end partnership
- Disparaging media at,  
Laura Kissel (whom has



CONFIDENTIAL

NO add-on to issue.

USC - 0658

Wednesday, February 22, 2017

Director Chametzky,

We, three students, would like to vocalize a concern regarding class procedures with Professor David Voros. We have become frustrated and disappointed with the lack of professionalism and structure being provided in class.

There are certain days of the week that have been planned and assigned as class time that meet at Devine Street at least once a week. On 3 occasions Professor Voros did not bother to show up and on 2 occasions he has arrived nearly an hour late and proceeded to be on his cellphone, sometimes even cutting the meetings to as short as a half hour long because of something that was clearly from being on the phone.

We believe that this is a waste of our time and money, as well as very unprofessional and disrespectful. Emails were sent in some cases and did not receive responses.

We understand that professors have control over how they operate their classes, but what are students to do when it is a question whether class will operate or not? For this reason, some of us have stopped attempting to attend the weekly meeting at this location and fear for our grade reflecting this chaos in the future.

We are not the only students who feel this way, there are students from all levels facing this as well. Some others are afraid that there will be backlash for speaking up, which only makes the classroom more uncomfortable.

Sincerely,

Concerned Students



Discussion with [REDACTED]

March 23, 2017 <sup>by</sup> [REDACTED]  
off

Oct. 1, Traveling. Vines  
graphed her and his self her (action  
in NY) subsequently Tigrane's self

Last Friday. Extravagant  
praise.

Richard Spivey  
Richard's model, made  
inappropriate, sexual comment.

Richard goes to  
party at Joanne's, follows  
her around.

Senior [REDACTED]

Sexual victims of [REDACTED]



Thursday, April 13, 2017 1:37:10 PM Eastern Daylight Time

**Subject:** No Contact Order for David Voros**Date:** Thursday, April 13, 2017 10:03:01 AM Eastern Daylight Time**From:** WELLS, CARL**To:** SCOTT, CLIFFORD, jsmisenheimer@gmail.com, CHAMETZKY, PETER

Cliff,

Dr. Chametzky

We are in receipt of a complaint from Jamie Misenheimer, which alleges that Dr. Voros showed up in her class and stood in place attempting to intimidate her. As of such, EOP has issued a No Contact Order to David Voros.

I copied each of you on the correspondent to David Voros.

Thanks!

*Our lives begin to end the day we become silent about things that matter.*  
Martin Luther King, Jr.

**Carl R. Wells, PhD**Assistant Director, Office of Equal Opportunity Programs  
Deputy Title IX CoordinatorOffice of Equal Opportunity Programs  
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UNIVERSITY OF  
SOUTH CAROLINA



Tuesday, April 4, 2017 9:52:38 AM Eastern Daylight Time

**Subject:** Painting 810

**Date:** Tuesday, April 4, 2017 9:32:20 AM Eastern Daylight Time

**From:** [REDACTED]

**To:** CHAMETZKY, PETER

Morning Professor Chametzky,

I'm sorry to have to inform you again that Professor Voros did not show up for a meeting he arranged for 8:45 this morning at the Devine street studios. Myself and other students ([REDACTED]) are now leaving after waiting for 45 minutes. I think that it is also worth noting that he singled me out to email him that I would be in attendance today, which I did do.

Sincerely,

[REDACTED]



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School of Visual Art and Design

May 19, 2017

Professor David Voros



Dear David:

In accordance with University policy, I have reviewed your Annual Report of Faculty Activities and your teaching evaluations. What follows is my assessment of your performance for the calendar year 2016. Last year's letter stated: "You were on sabbatical in spring 2015." As far as I can see, no sabbatical report was ever submitted. We do not have a copy in your personnel file, and I find no copy of it or my covering memo on my computer. I refer you to page 53 of the Faculty Manual, Sabbatical Leave Procedures, for the potentially serious consequences of such an omission, and urge you to attend to this requirement as soon as possible, providing an explanation of the delay.

Teaching:

You taught a total of 43 students in spring - fall 2016, in a variety of courses in painting and drawing. In the spring, you taught 21 students in ARTS 232, 532, 410, 411, and 810 (a course you redesigned in 2016). There were course evaluation from 7 students, with a Global Index of 4.12 and Instructor Effectiveness average of 4.03, good scores. There were three narrative comments, two of which were very positive: "Very distinguished in his work. I am very grateful to be part of this University with instructors as this one" and "great artist and instructor." The third was, "Class needs to be more organized, instructor needs to be on time and stay in class, model for drawing needs to be monitored because without the instructor present she takes a lot of breaks and moves which makes drawing hard." In fall 2016 you taught 22 students in the same line up of courses. There were evaluations from 3 students. The Global Index was 4.43 and Instructor Effectiveness average 4.5, very good to excellent quantitative results, but from very few respondents. There was one comment (the two you listed on your Activities Report were from fall 2015): "superior experience. No Instructor will challenge you more to reach beyond your limits." You advised 20 undergraduate and 5 graduate students, and one undergraduate research project. It is clear you are an effective teacher from whom our students have much to gain, and from whom they gain much. Attention to such issues as tardiness can only make your impact even stronger.



Research/Creative Activity:

You continued to work actively on your creative research. You exhibited your work twice in 2016, in two solo exhibitions, *Prometheus Bound*, at the Chinese Culture University in Taipei, and the National Taiwan University of the Arts, both in December. You also gave a presentation at National Taiwan University of the Arts. You list six projects in progress, totalling about 300 works. This is an ambitious agenda. I wish you the best of luck in bringing these projects to conclusion and look forward to the results. Each promises to be a significant accomplishment and addition to your creative research.

Service:

You served the university by coordinating USC in Italy in summer 2016, including Arts and Sciences humanities, art history, and studio courses. For the school, in addition to your duties in the painting program and the Italy program, you served on the Health and Safety and Recruitment committees and on the search committee in 3D Studies—which successfully completed its search in spring 2016. Thank you for your service on this important committee. You rendered professional service as Director of the International Center for the Arts in Monte Castello di Vibio, Umbria, Italy, and as a peer mentor at the 2016 College Art Association meeting (a role that we sadly could not fund in spring 2017).

Summary:

You taught effectively and continued to advance your creative research in 2016. Your role as Director of the International Center for the Arts is significant (compensated) service to the field, and offers our students excellent opportunities for international experiences. At times, though, this role can conflict with your duties at USC. In 2016 you remained in Italy, without any School authorization, until August 24. Faculty reporting day was August 16. This caused you to miss your first class. I appreciate that you apologized for your absence and failure to get it authorized. You stated that it was an oversight, and for the rest of the year were conscientious about filing travel authorizations for absences. You regularly employ USC students to work at the ICA over the summer. This has provided many students over the years with extraordinary, life-changing opportunities and experiences. Unfortunately, in summer 2016, you had a serious conflict with one of our students. This led to that student filing a complaint against you with the USC EOP office. The complaint was investigated and dismissed. However, the repercussions of it continued to impact negatively in painting and in the school, particularly the graduate programs, throughout the year. While this was an isolated case, I urge you, as per Carl Wells's letter to you of August 3, 2016, to work with the EOP Office and the Office of the General Counsel "to explore what safe guards must be put in place to ensure that you, the University, and our students are not put in similar situations in the future."

*[Signature]*  
I am available to discuss any aspects of this letter or your appointment.

Sincerely yours,

*Peter*

Peter Chametzky  
Director & Professor