

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

3:18-cv-01604-MGL

Memorandum of Law in Support of Harris Pastides and USC's Motion for Summary Judgment

Exhibit 7-

USC 0144-352

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UNIVERSITY OF
SOUTH CAROLINA

EOP CASE #2015021301

Allison Dunavant,
Complainant

v.

David, Voros,
Charged Party

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UNIVERSITY OF
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UNIVERSITY OF
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EOP CASE #2015021301

Allison Dunavant,

Complainant

Statement



Interpersonal Violence Incident Report
 Submitted on May 16, 2016 at 6:02:12 pm EDT
 Last modified May 17, 2016 at 12:19:23 pm EDT

Type: **a) Complainant/Victim wants university action**
 Urgency: **One of the individuals (Complainant/Victim or Respondent/Alleged) is Faculty or Staff**

Incident Date: **2016-05-01**
 Incident Time: **1:00 pm**
 Incident Location: **Other (please specify in specific location box)
 Montecastello de Vibio, Italy**

Reported by

Name: **Dale Moore**
 Title: **University Employee**
 Email: **DM@mailbox.sc.edu**
 Phone: **777.8237**
 Address:

Involved Parties

Ilene Dunavant () Non-USC affiliation	Female	910.228.1350	
Allison Dunavant (S73289893) Survivor	Female	dunavana@email.sc.edu Off Campus	9102004728
DAVID VOROS (E20647594) Faculty	Male	VOROS@MAILBOX.SC.EDU MCMASTER 243	8037774236

Detailed Information

* Please provide a detailed description of the Incident(s) you are reporting.

Ilene Dunavant, mother of Allison Dunavant, MFA student, called at about 10:AM on 5/16 to discuss her concerns about her daughter's living and work conditions and ask for help in helping remove her from what she described as dangerous and unacceptable living, working, and travel conditions. She cited numerous email communications from her daughter complaining about her treatment while participating in a "USC-sanctioned Study Abroad" experience. She talked about unreasonable unsafe living and working conditions, improperly supervised travel excursions, food deprivation as punishment for laziness, ostracization, and abusive language. These allegations were made against her host and employer, David Voros, USC Associate Professor in Studio Art, "owner" of the USC in Monte Castello school in Montecastello de Vibio, Italy. She feared for her daughter's safety and emotional well-being and seemed desperate for USC to intervene. She also shared her daughter's concerns that complaints and plea for help could lead to academic retaliation. Her concerns had been reported to our Campus Police, Office of Study Abroad, and the Office of the Provost.

* Type of Interpersonal Violence

Harassment

* Survivor has been advised of the following resources (check all that apply):

USC Police Department, On Campus Counseling, Title IX Office, Off-campus resources (including counseling and support services)

* Does the assaulted person plan to contact law enforcement?

Unknown

* Does the assaulted person plan to seek university disciplinary action?

Unknown

* The assaulted person has been informed that they will be contacted by the Title IX staff?

No

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* Does the assaulted person want to receive a no contact order?

Unknown

* Were alcohol and/or drugs involved in the incident?

Unknown

* Does the assaulted person believe they were drugged?

Unknown

Pending IR #00000529

Submitted from 129.252.250.155 and routed to Carl R. Wells (Asst. Dir. EOP)

Modified by Carl R. Wells on May 17, 2016 at 12:19:23 pm EDT from 129.252.66.91

USC - 0148

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I am a graduate student pursuing my Masters of Fine Arts, in Studio Arts with a concentration of Painting, in the School of Visual Art and Design at USC. I have completed one year of my degree and have two years left in the program; the second year which I am to begin this coming August. David Voros has been my professor for both Fall 2015 and Spring 2016 semesters of this past school year. I have taken his 800 level painting seminar both semesters, as well as his 500 level advanced life drawing course. While in Professor Voros' seminar course, he suggested to me several times that my artwork would greatly benefit from visiting Italy and seeing artists' work in person, such as that of Titian and Michelangelo. I reciprocated this desire to go to Italy because of the possible benefit the experience would have on my artwork, and thus on my degree as a whole. I looked into the "USC in Italy" trip and could not find any financial aid available for grad students, and renounced it as a possibility. David Voros then helped me write a SPARC Grant proposal, with the hopes of potentially funding a trip for myself to Italy. It proposed that I used the \$5,000 that could be awarded by the grant for a plane ticket to Rome, Italy as well as for an artist's residency at Montecastello Di Vibio, International Art Center (ICA). I learned after arriving in Italy that David Voros is co-owner of this facility. Professor Voros also wrote a recommendation for me to be nominated for the Rhude M. Patterson Graduate Fellowship; an amount, if awarded, that would also be \$5,000. When I did not receive either award, David Voros presented the idea and opportunity for me to go to Montecastello di Vibio, Italy with him for three weeks. He also invited two other students, [REDACTED] and [REDACTED]. Professor Voros pulled us aside during class time to discuss the details of this trip. He suggested we either come during the month of May (prior to the "USC in Italy" group arriving) or May 22nd-June 12th (with the "USC in Italy" group). Professor Voros ended up stating that I, and the other students, should come to Montecastello during May because he was unsure that there would be enough space when the USC group arrived. He said he would provide meals and accommodations in exchange for us helping him get the ICA ready for the USC group's arrival. The only thing we were to purchase on our own was our roundtrip plane tickets. He made it clear that we would have plenty of time to explore various Italian cities, to make excursions to see art, and to spend time in studio spaces working on our own artwork. He emphasized to me, on several occasions, the value and benefit this trip would have on my education. This was the foundation of my presumptions for the trip and with that in mind, I decided to go. Based on the verbal discussions I had personally with Professor Voros, I anticipated light work and some minimal cleaning in order to ready and organize the ICA for the incoming students. There was no written description regarding expected duties, tasks, or what work needed to be accomplished. There was only an email, after my plane ticket was purchased, that stated in brief, that there was "a lot of work" to be done. There was no work/employment contract or written agreement and I was not presented with, nor did I sign, any document that was compliant with a preset expectation of scheduled daily manual labor. All I had in mind, and the sole focus that compelled me so strongly to go on this trip, was seeing and making art. I wanted to better my art and therefore enrich my experience as an MFA student.

When I arrived in Montecastello at the ICA, along with the two other students on May 4th, I had no unusual expectations of our accommodations. I had no expectations of luxury. I anticipated, however, that our accommodations would be safe, clean, and comfortable. What I observed did not coincide with this. Montecastello is a small hilltop village that is circular and maze-like, and I believe dates back to Medieval times. Very few of the locals speak English, and there are only a couple of

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restaurants; a coffee shop, a bakery, and two tiny markets that sold lunch meats, snacks, and a few toiletries. The building we stayed in, the ICA building, had an air condition/ heating system but was not turned on, and therefore the building remained cold. (see photos) This was especially true and a problem for sleeping at night when the outside temperature dropped into the 40s. I slept in leggings with sweatpants over them, socks, a long sleeve shirt, and a sweatshirt to combat the cold temperature. There were no bedding or linens, nor towels or rugs in the bathrooms. We had what we brought with us. Scorpions, spiders, and other insects were everywhere within the building. (see photos) Furthermore, the building as a whole was dirty. We were essentially staying in a building that was not deemed fit or ready for the "USC in Italy" group, but by Professor Voros' standards was okay for us. The bathrooms were uncleanned and the little spigots on the shower heads were blocked and did not work properly. For me, one of the most undeniable instances of the state of filth was the cat spray/urine that was prevalent in nearly every room, and on every floor. (see photos) The smell of this permeated through the building. David Voros informed us that there were a lot of cats in the village and that they'd gotten into the building over the winter. The bedding I brought with me came back covered in urine (see photos). Aside from this, [REDACTED] and I immediately began working to prepare the school the following morning- May 5th. For the first few days of our stay we worked immediately following breakfast (8 am) until lunch (2 pm) and then after lunch until dinner (8 or 9 pm). All meals were provided by and served at David Voros' home.

The nature of the work that we ended up doing was beyond anything I could have, or ever would have, anticipated. Some of the tasks we were required to do included cleaning a terrace covered with cat feces and debris, dumping out dirt filled planters, pulling nails and tacks out of walls, moving furniture, scraping tape off of shelves, scrubbing dried clay off of tables and boards, using brooms to knock down spider webs, removing paint from bricks with a sponge, painting a basement and attached room, and scrubbing cat urine from couches and their cushions. (see photos) We spent a lot of time in the basement which was cold and damp. I was congested and having headaches as a result; overall not feeling well for most of my stay. Although I did not agree with the type or work Professor Voros had us completing, I worked hard and complied with everything that was asked of me. The only thing I refrained from doing was lifting couches and armoires and carrying them up/down stairs. I did not think that this was a task that was physically safe for me to do as a small female and could not keep up with the other two male students in this regard. I was singled out by David Voros and the other students as not being a hard-worker which created an uncomfortable work environment. This work was not the type of set-up work I had anticipated on doing while in Italy. I did not even pack clothing that was in accordance with this type of labor, because I had no idea that it was what would be expected. Had I known, I would have decided to stay home. During my stay, I was not provided with any ample studio time or opportunity to work on my personal artwork. All time was used as time for labor. Professor Voros said we could go to the studios (which were a separate building from where we slept) after dinner or during the night. Dinner typically ended at 12 am or later, 11 pm if we cleaned up quickly, and we had to get up the following morning at 7 am. With these things in mind, this was not a viable opportunity to do artwork in the studios. Nor was it an opportunity that I felt was safe. We made two abrupt trips to Perugia and one to Assisi (May 8th), about an hour and a half in length each, because Professor Voros had errands to run in these places. These trips were brief and extremely rushed, to the point of not

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being able to see all of even one museum or church. Alex Miller, a former USC MFA student arrived, on May 9th. I am uncertain what her position is within the university but she has been participating in classes, and using materials from the ceramics lab, for the past year that I have been at USC. I am also uncertain as to her purpose of being in Montecastello.

On May 13th we were supposed to work for part of the morning and then go to Rome in the late afternoon. I woke up at 7 am and was had a migraine. I skipped breakfast and spent the morning throwing up. I am not sure what triggered my migraine; it could have been some of the foods we were eating, having a couple glasses of red wine the evening prior or just overall exhaustion and exposure to cat urine and feces as well as dirt. I skipped breakfast and went back to sleep to try and rid myself of the migraine. I thought this would be okay that I missed one morning of work, because David had let Alex Miller take an afternoon off before for being hungover; and I was actually sick. I profusely apologized to Professor Voros after lunchtime when I was feeling better and had stopped vomiting. He said not to worry, that no one enjoys or plans on being sick. He then suggested I could put in 30 mins of work or go ahead and pack to get ready to go to Rome. I chose the latter. David Voros dropped off [REDACTED] and I at a bus stop near an Ikea outside of Rome. He said he was unable to go with us to explore central Rome because he had too much work to do in order to set up the school. He proceeded to go to Ikea to shop with Alex Miller. We were left with a map containing circled locations of art Professor Voros thought we should see and instructions to be at the train station, Termini, the following day by 6 pm so that we could make the connection from Rome to Terni, and then Terni to Fratta Todina. Directions were unclear, limited, and hasty. We stayed at a hotel together that night and explored Rome the following day, May 14th. We made it back to the Termini train station by 6 pm, as instructed, which proved to be too late to catch the last train going to Fratta Todina that evening. So we were stuck in Terni and it was 8 pm local time. [REDACTED] called David Voros, because [REDACTED] and I did not have cellular service, and because we were uncertain as to what to do in this situation, having only planned to spend one night away from Montecastello. He responded saying he could not pick us up from Terni because it would be a 2.5 hour trip for him; we would have to spend the night. We found a bus/train that could take us to Todi station, a town we were familiar with outside of Montecastello. We presented this option to Professor Voros to which he responded, "Who will pick you up from there? You guys should have followed instructions better." [REDACTED] and [REDACTED] had both conceded to staying in Terni over night at this point but were not interested in getting a hotel. They were considering sleeping in the train station. I felt highly unsafe and uncomfortable doing this and eventually convinced them to get a hotel with me for the night. I was able, once on the hotel's wifi, to look up how far we were from Montecastello as well as how far the Todi station would have been from Montecastello. Terni was only a 30-45 minute drive from where Professor Voros was in Montecastello, and Todi only a 15 minute drive. I was extremely confused as to why Professor Voros could not pick us up, when we were in such close proximity to him. He stopped answering his cell phone after a certain point. I emailed David Voros, (see email correspondence) because I had no other way of communication with him, to try and figure out why we were being left in a town overnight-again only being a short distance from Montecastello and the ICA. It felt like punishment. David cc'd, or copied, [REDACTED] on the emails I sent and called him to tell him to check his email. I am not sure of the purpose of including him in our email correspondence other than to make it seem as though I was the only one that felt that way.

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The next day, May 15th, we missed the 11 am train towards Fratta Todina because we thought we were waiting for a bus, and therefore were on the wrong side of the station. No one in Terni spoke English and we did not speak Italian, which made getting directions/instructions a difficult task. We were able to get ahold of David Voros at some point during the morning, and he said if we were not at Fratta Todina by 1:30 pm that we would be on our own in terms of getting up the hill and back to Montecastello. We made it on the next train out which at 2 pm and arrived at the Fratta Todina station at 3:40 pm. We tried calling Professor Voros, received no response, and began walking up the hill towards Montecastello. This was easily an hour worth of walking with a steep incline, along a winding road. Half way through this walk, David Voros calls to ask us where we were at. We stop where we are to wait for him to pick us up alongside the road. When he pulled up we went to get in the vehicle and put our bags down but he told us we were not allowed to get in the car; he wanted to have a group talk first. He got out of the car and began shouting at us and stating we were all adults and should have better followed his instructions. He also said that we were not in Italy in association with the University or otherwise with any program; that we were there because of his generosity. I looked away to compose myself; I was hungry, thirsty, tired and being scolded at in a tone I perceived as hostile. I felt like I was going to cry so I thought it was better to look away. Professor Voros understood this as an offensive gesture and told me to look at him when he was speaking. He directed the rest of the conversation towards me and went on to say that I was rude, ungrateful, and all I had done since I had been there was "bitch." Professor Voros also stated that I owed him work and how he could have picked other students that would have been harder working and more grateful than I was. I told him that maybe he should have picked another student to come because I had no idea that the trip would be almost entirely comprised of working. This enraged David Voros enough to make me both scared and intimidated by him. He said I could find my own way back up to Montecastello, removed my things from the ICA building, and leave. He then asked [REDACTED] and [REDACTED] to get in his car with him and they did. They started to pull away, leaving me there alongside the road. I was having a panic attack and hysterical at the thought of being left behind in the middle of nowhere, with no water, in a country whose language I did not know. I called my mother to help me calm down and figure out what to do; she put me on the phone with my father since she couldn't understand me. My cell service kept going in and out and I was having trouble breathing evenly. Professor Voros had stopped pulling away in the car and Alex Miller got out. She came to talk to me and said I needed to apologize to David before I could get back in the car. I said I would not apologize, because I hadn't done anything wrong. She waved down someone who was driving by; that I guess was a local. He drove me back up to Montecastello. I waited for David Voros to leave the school building so I could go to my room peacefully and figure out what to do, or to get my stuff but he wouldn't leave the ICA building. I did not want to be near him, for fear of what he might do. I walked to the one hotel that was in Montecastello and asked if there was vacancy; there was not. So I walked back to the school building and sat outside to wait for David to leave the building. I stayed on the phone with my parents the entire time.

Alex Miller eventually came outside to speak to me in place of David. She asked me what I was planning on doing and when I would be able to get my stuff out of the building and leave. She tried to tell me that David had made no threat to me, and did not leave me on the side of the road; that I elected to do this on my own. This is false. I told her that he couldn't just kick me out, with nowhere to

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go in Italy- because I'd be completely alone. Her reply was that he could because it was his property; that he could call the police if I refused to leave. This greatly concerned me because there was no vacancy at the sole hotel in Montecastello and no public transportation that came to the town either. She went on and said I hadn't been working hard-and that she was personally offended by this; she questioned me as to whether I had ever held a real job. She claimed that David was my employer, my boss, and that I was his employee. I said no, I was not his employee and he was not my boss-I never signed or agreed to a contract of employment. My relationship to him was a professor-student one. However, I asked her to give me examples of when I hadn't been working hard enough because once again I did not understand where this was coming from. She said it bothered her that I didn't jump up quickly to do dishes the morning she was hungover, and also that I had straightened my hair and put on makeup to go to Rome after having a migraine all morning. She accused me of being hungover or wanting to get out of working. She provided no actual instances of me not working. I was on the phone with my mother who heard this conversation and spoke with Alex when I was having trouble speaking because of crying and being so upset and scared. After speaking with my mother Alex went back into the school building, leaving me outside while she went to go speak with David. She came back out and said that it was all just a misunderstanding and that I could stay at the ICA for the night. She said that I should not go to dinner at his house, that she would try and get him to cool down, and that I should talk to him in the morning to apologize. She said I should not go to breakfast either, that I should apologize after. Once again, I said I would not apologize for things that I had not done wrong. I told her I would be quiet and keep working in order to have somewhere to stay and to eat. She said she didn't think David would accept that. I stayed in my room the rest of the evening and night and around 11:30 [REDACTED] brought me leftovers from their dinner.

The following morning I did not go to breakfast and while the other students were still at David's home cleaning up from breakfast, David came and asked to speak with me. I was hesitant to speak with him. David said he has never had a student as disobedient and rude as I was, in his 20 years of teaching. He said he would report me to the art department and have my emails forwarded to Andrew Graciano. He continued on and questioned my understanding of the trip to Montecastello and said that I was his employee and owed him work. I told him this was the first time I was hearing anything from him about being employed. He said I owed him 5 hrs of work a day for 5 days a week for as long as I was in Italy. I expressed to him that this was never part of our agreement or the terms of my coming to Italy. David said he was having the other two students, [REDACTED] and [REDACTED] email him to say that their understanding of the trip aligned with his. I said this was irrelevant because we all had separate verbal agreements or understandings of the trip, and what was said to me could have easily differed from what was said to the guys. I told him exactly what I said to Alex, that I would work peacefully so that I had a place to stay and food to eat. He said no because I didn't have the appropriate attitude and that I could not work until he had deemed my attitude had been changed. Professor Voros also said that if I did not work then he could not provide me with meals. He then said I needed to wait with him in his office until the other students returned because he wanted to have them tell me that I was wrong about my understanding of the trip. In that moment I became uncomfortable with the idea of waiting alone with him in his office, because of his harsh tone towards me, so I told him that I was going back to my room. [REDACTED] brought me cold breakfast leftovers, with no utensils.

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I went into the laundry room to retrieve the clothes I had left in there; I wanted to make sure all of my belongings were consolidated just in case I got kicked out or forced to leave suddenly. I ran into Alex and [REDACTED] in the laundry room. Alex asked me what I was going to do if I didn't plan on apologizing to David. I responded saying; hopefully I could just work peacefully with everyone until leaving a week later. I expressed that I just wanted to have an ensured place to sleep and food. She said that couldn't happen until I apologized. I told her I was trying to get in touch with USC to find a solution. She said she knew because David had been contacted by someone there, likely Allen Miller. She said that following this conversation David was immediately contacting a lawyer and that's where he was presently. I got scared at this point because I didn't know what this meant for me and my situation. I was also contacted by Allen Miller (around 11 am-12pm) who told me that USC couldn't do anything for me or about the situation until I was back in the United States. He said that USC could make sure I had money for food if I had problems with that. He kept asking me if I felt safe. I said that it depended on how you defined safety; I was not immediately in physical danger but my situation was unpredictable, David was unpredictable, I was stuck, and I did not have food. Not long after this Alex came and spoke with me (see recording). Sometime shortly after this everyone left for lunch at David's house. I was not given lunch, and wandered around Montecastello during this time trying to find somewhere to eat because I was hungry. Everywhere was closed for the next few hours for siesta so I had cookies and an orange I found in the school building. When they returned from lunch David asked to speak with me again, but this time with Alex Miller present (see second recording.) He started the conversation by stating that I had a few options but by the end of the conversation, during which I barely had a chance to speak, he had made the decision for me. I would have to provide my own food and transportation if I needed to leave. Both tasks were next to impossible. There is no transportation that leaves Montecastello, the only way to get a ride is if you know someone who has a car. Again, I did not speak Italian so this would be quite difficult. He wanted me to call my mother immediately and tell her I was safe. There was a large emphasis on this. I learned soon after this from my mother that USC could have helped me leave immediately if they thought I was unsafe. Someone else from the University had contacted her saying that I was safe. Allen Miller and David Voros did not present this option to me. They both insisted that I tell everyone I was safe, when I clearly did not feel safe. They withheld this information from me. This makes me immediately panic, that I would be stuck in this environment without food and without anywhere to go for a whole week. I was able to get back in contact with Allen Miller and his assistant Trudie helped me arrange a flight to leave Tuesday morning. David Voros somehow got me a hotel room (not sure how this happened because they were booked when I asked Sunday evening) and I was able to eat dinner. David also arranged for a local Italian man to drive me to the airport at 6 am the day of my flight; Tuesday morning.

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UNIVERSITY OF
SOUTH CAROLINA

EOP CASE #2015021301

David Voros

Respondent

Statement

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Dear Allen,

As per your request, I am providing below the circumstances regarding the situation in Italy with Allison Dunavant.

After speaking with Allison prior to her departure and reflecting on circumstances surrounding these issues, my opinion and - as described later in this account, the perspective of others who witnessed our interactions - is that Allison's version of events, as well as her understanding of her verbal agreement with ICA does not accurately represent what transpired. Nonetheless, I feel that both I - and ICA as a whole - have acted rationally, responsibly, and appropriately in addressing the situation. Further, that we have acted in a way that is in keeping with company protocols developed in context of both U.S. and Italian labor law.

In terms of background, I should point out first that it has long been a tradition with the art school in Monte Castello to provide working scholarships for students as a means of helping talented students from less affluent families study in Italy. As I expressed to you numerous times, coming myself from a family of limited means and thus unable to study abroad, this is a particular mission of mine. However, this is also a common practice among artist residencies around the world and I invite you to search Artist Residences in Italy and you will soon find among the many options:

working scholarships. At ICA, we will provide six of these opportunities for students from diverse institutions and for varying periods of time in the course of the summer. Despite our objective at ICA to provide opportunities to disadvantaged students however, common sense would dictate that as an employer and business-person, I must also be vigilant to the needs of our company and coordinate things in an effective manner. This includes notifying employees if their performance is sub-standard. I believe this is not only entirely reasonable, but expected.

Regarding the current situation with USC students: ICA offered working scholarships to 3 students from USC: two graduate students and one undergraduate student. All three sought to participate in the USC in Italy program, however all were unable to find sufficient financial support for their endeavor. One student's need was so great in fact, (in contrast to his initiative) that we also elected to purchase his transatlantic plane ticket.

This spring, one of the USC students, Allison Dunavant, came to me complaining that as a graduate student, there were no sources of aid available to her through USC Study Abroad. As you recall, I referred her to you. Your advice (according to my recollection) was for Allison to seek funding through the department or college. With this in mind, I advised her to apply for CAS funding and assisted her in applying for a CAS scholarship for grad students. Together with my colleague, Andrew Graciano (whose input I encourage you to seek), coordinator of our grad program in SVAD at USC, I recommended her for the funding. Andrew also recommended her for another grant, for which I provided a letter of support to the college.

Ultimately, because I felt that these three were serious and committed students I met with them together in mid-March off-campus and I told them of the opportunities for work-study scholarships provided by ICA. In this case, their activities would be in preparation for the USC group on May 23.

The situation our company offered them was that in exchange for working five hours per day, five days per week, ICA would provide accommodations, meals, and studio space for them. I made it clear that during their off-time, they could travel at their own expense, but that sometimes they could also accompany me on errands to locations that could be of interest to them and to remain there (again returning at their own expense) on week end, without reservation. At the time, we discussed the parameters of their duties and obligations at length., I will also point out that we had numerous meetings together after the groups arrival to confirm the implementation of this schedule in terms of daily events. I feel quite confident that after speaking with the rest of the group that they were clear on the parameters of the arrangement.

Upon the students arrival - and until Friday - all seemed to be going according to plan and all seemed satisfied. The group was assigned tasks around the building that included painting walls and cleaning as previously agreed. The work was not particularly strenuous and no one expressed complaints or indicated any heath issues that would hinder the performance of their duties. Overall, the group was clearly enjoying the experience and were also producing artwork, which we discussed as a group. In the course of my own activities, I took them to visit museums in Perugia and Assisi, where we spoke together about masterpieces in the collections. Throughout their stay they had been provided meals, which we prepared communally, which we will continue to do until our kitchen opens on Thursday.

In the course of their stay thus far, I have met with the group frequently and discussed the workload and conditions (as we continue to do) and to plan future activities - all seemed agreeable that it was a fair arrangement and in keeping with our verbal agreement and their expectations. Allison was of course engaged in this discussion and expressed no reservations about the type of work she was assigned or the workload, nor did she at any time advise me of any heath concerns that would impair her ability to work, or that could otherwise endanger others. Despite the fact that she voiced no objections to the work or workload to me directly, several students expressed to me that Allison told them that if I wanted certain work done (such as cleaning) I should do it myself. Following our Thursday meeting, two of the students came to me afterward expressing frustration that they felt Allison was not doing her share of work and placing additional burden on them to complete their tasks. Both expressed that were frustrated that Allison seemed to be spending of lot of time on the phone and that her work pace was erratic.

I spoke to her about this and also advised my assistant, Alexandra to more closely monitor Allison's work progress and to assign appropriate tasks to what appeared to be in her abilities. Alexandra reported to me that while Allison was argumentative, she agreed to comply.

I became quite concerned about the situation developing in Monte Castello with her peers and spoke to Allison about her job performance in Monte Castello. In the course of our conversation, Allison agreed to apply herself, but was argumentative. Afterward, other students came to me in confidence and reported that she told them that she did not feel that she needed to acknowledge me as her supervisor and complained that she did not feel a need to do manual labor. This of course seemed strange to me, since I quite clearly explained the activities the group would engage in in exchange for their stay and no one felt his unreasonable.

On Friday Allison failed to show up to work, complaining of a headache. Allison then slept until lunch and then afterward spent the remainder of the day packing for the weekend trip to Rome while the other students worked. Allison appeared to be in good health and spirits at that time. The other students appeared quite agitated about the situation and complained. Consequently, I asked Alexandra to speak to Allison again when the group returned from their trip on Saturday.

On Friday afternoon, since I had business in Rome, I agreed to take the students to a suburban Rome location from which they could take a bus into the city. My colleagues, Eros, our general manager and Alexandra our staff manager, and I dropped them off them at a central bus station where they could find transport to their hotel in Rome, where I had made a booking for them (Best Western Canada). Alex, Eros, and I walked with them to the bus stop to be sure they got on the correct bus. I provided them with a map and an itinerary for Rome and specific instructions on how to find their hotel as well as information regarding their return trip.

The group was instructed that upon arrival at the bus station at Rome Termini, they would enter the station and in passing through en route to their hotel, they would confirm their return schedule and email me the details. (In our departure conversation, we emphasized that they should check the return schedule because they would have to transfer trains on their return at the city of Terni, about 45 minutes drive from Monte Castello and the small train line to Monte Castello provided limited service in the late night hours.) I told them quite specifically about ICA's policies regarding off-campus travel and they were clear that if they cold not make their connection, they would remain in Terni overnight.

Nonetheless, they failed to check the schedule and did not look into the departure times of the connecting train until they reached Terni. As a result, the group was stranded at Terni on Saturday night. They informed me by phone that they had missed the train at approximately 8:00 PM. As per our discussion, I told them that they had two options:

1. Stay at a hotel in Terni and continue on the next day
2. Our driver could pick them up at Terni for €20 per person. (The payment is made directly to our driver, Carlo Innocenti and is a very reasonable rate.)

They decided to stay in Terni and continue on the next day. Later that night however, I received two emails from Allison that I found most inappropriate in tone and disrespectful. I have forwarded these messages to you. In summary, she indicated her frustration that I was not willing to pick them up in Terni after 9:00 PM (a 45minute drive each way, door to door. I calculate an additional 15 minutes on each end for loading and traffic and thus this represents a two – hour drive.) Allison appeared incensed that I refused to do so. In fact, she sent me a message that I felt to be quite sarcastic in tone, accompanied by driving maps and driving times (to show me how simply I might have gotten there to pick them up apparently). The fact that she failed to calculate the round-trip time is in my estimation significant. She also suggested that they might have taken a bus to the nearby town of Todi, which arrived at about 1:00 AM and that I should pick them up there when it arrived. I did not reply to the latter.

It came as a great surprise and concern to me that in the course of her correspondence on the above matter, Allison also revealed to me that she was an epileptic and subject to severe migraines. She had never expressed this to me before that point.

On Sunday, the group contacted me, indicating that they would arrive at the nearby Fratta Todina station at 2:00 PM. With this objective in mind, I drove to the station and waited for over an hour before I received a call on my cell indicating that they had again missed their train and that they would arrive at 4:00 PM. Since I had business in Perugia I drove there and returned to Fratta just after 4:00.

Unfortunately, instead of waiting, Allison insisted on walking up the hill to Monte Castello (45 minutes in good weather). Regrettably, they did not contact me with this plan change and proceeded up the hill. At the train station meanwhile, I waited for over an hour before she became fatigued with her walk and insisted that the other students call me. Approximately half-way in their path up our mountain, I received a call from one of the students asking us to pick them up. Since we were at the nearby train station, we arrived quickly. Upon locating the group at the side of the road we pulled over and parked. I told the group that before proceeding further we needed to discuss the situation with their weekend travel and the fact that I had spent several hours driving around looking for them. Allison complained that they could not reach me by phone, and thus could not contact me. This is strange since my phone was working and I was receiving calls. My call log showed no missed calls or messages, nor did I receive any email correspondence from them, save Allison's emails of complaint I described earlier. The latter clearly had no difficulties finding me. All three students travelling together had working cell phones.

I spoke to the group (then gathered in a parking area on the roadside) firmly and clearly about the situation. No one present expressed concerns about my tone or language, although I was understandably angry at the situation. As their supervisor, I notified the group that before proceeding up the hill we needed to have a discussion about policies and about hotels. I also told Allison that her tone in the emails was unacceptable and that if she did not change her behavior that we had no recourse but to tell her to pack her bags and go to the hotel next door for the remainder of her stay. She became incensed at this and told me:

"I am about to get mad!" She then stormed off and sat on the guardrail about 20 feet from where we were parked. Feeling concern for her safety and that of the group, I instructed the other students to get in the car. I got in the car as well and asked my assistant Alexandra to speak to her and convince her to get in the car and ride up to the village with us and to further inform Allison that she (Alexandra) would accompany her to the school while she packed her bags and then would accompany her to the hotel in order to make sure she was able to check in. We waited without moving the car for about twenty minutes while Alexandra spoke to her.

Alex returned to the car to inform me that Alison was quite agitated and that she refused to get in the car. After waiting for another ten minutes while Alex spoke to her a friend from the village drove by and Alex asked him to drive Allison up to the village. Allison accepted and they drove together to Monte Castello.

Upon reaching Monte Castello, Alexandra accompanied Allison, attempting to calm her down. In the course of the next hour or so, Allison telephoned her mother while Alexandra was present and Allison's mother asked to speak to her as a representative of ICA. I did not witness this, however Alexandra reported to me that Allison's mother was hostile and raised her voice to a level at which it made it necessary for Alexandra to inform the mother that if she did not moderate her tone, she would terminate the call. In the course of her conversation, Alexandra attempted to assure the mother that everything was safe, but that given the situation however, that we were well within our rights to insist that Allison leave the premises and move to the hotel if she did not moderate her behavior.

Ultimately, Allison returned to the ICA premises assuring Alex that she would moderate her tone. Allison chose to remain in her room for the remainder of the night. We sent dinner for her to her room.

The next morning, I asked Allison to come to the office (while I was accompanied by our manager, Eros Tassi) and I attempted to explain our position and policies. Allison almost immediately became confrontational and indicated that she did not work for me and that regardless of what others thought the parameters of the situation to be, she did not share the perception that she should be required to do manual labor. She indicated that she did not feel comfortable talking to me and that she was going to her room. When my assistant Alexandra arrived, I asked her to speak to Allison and try to reason with her. However in going to her room, Alexandra reported that Allison refused to speak to her and had locked herself in her room. She remained in this situation for a couple hours. Out of concern with the situation, I contacted our attorney, Alex Bonta in order to get advice on how to address the situation within the parameters of Italian law. Alex advised me that if Allison refused to leave the room and was not responding, I should contact the local police and ask them to address the situation. This became unnecessary however when Allison came downstairs from her room.

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Office of Equal Opportunity Programs

Dunavant v. Voros

After speaking with you on the phone, I informed Allison that I felt that the best situation for her would be to continue to stay in our facilities for the remainder of her trip, without the obligation to work. I advised her that she could take her meals at the hotel at her own expense. She seemed quite comfortable with the situation and returned to her room.

A short while later I received a phone call from you indicating that USC would book a ticket for Allison and that she had chosen to leave early. As you know we arranged a hotel room for her and provided transport the next morning. She arrived at FCO by 8 AM.

I hope that the above will help in understanding more clearly the situation.

David

USC - 0161

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Office of Equal Opportunity Programs

Dunavant v. Voros



UNIVERSITY OF
SOUTH CAROLINA

EOP CASE #2015021301

Letters

USC - 0162

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Office of Equal Opportunity Programs

Dunavant v. Voros



Equal Opportunity Programs

June 24, 2016

Allison Dunavant
 Sent electronically to dunavanta@email.sc.edu

PERSONAL AND CONFIDENTIAL

Regarding Case Number: 2015021301

RE: Allison Dunavant, *Complainant* v. [[DAVID VOROS]] David Voros, Charged Party
 Complaint Number: 20150213

Dear Ms. Dunavant,

A Notice of Charge of Discriminatory Harassment has been served upon [[DAVID VOROS]] at the University of South Carolina. Please refrain from discussing this matter with any other member of the faculty, staff, or student body while this matter is under investigation. Our office will contact you when the Charged Party responds to our request for information.

If you would like to provide us a list of witnesses (or additional evidence) who have first hand knowledge of the treatment you and other similarly situated students have been subjected to, please provide this information to us as soon as possible. Also, please know that the University has zero tolerance for retaliation. If at any point you feel that you are being subjected to retaliation as a result of the this matter, please contact me immedately.

Should you need any additional information please contact me at 803-777-9560.

Sincerely,

Carl R. Wells
 Asst. Dir. EOP

CC: Joan Gabel, Provost, University of South Carolina
 Bobby Gist, Exec Asst. To President for EOP
 Roger Sawyer, Associate Dean, Arts and Sciences

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Office of Equal Opportunity Programs

Dunavant v. Voros



UNIVERSITY OF
SOUTH CAROLINA

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 wellsr@mailbox.sc.edu.

Sincerely,

A handwritten signature in black ink that reads "Carl R. Wells".

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

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Office of Equal Opportunity Programs

Dunavant v. Voros



Equal Opportunity Programs

July 21, 2016

Allison Dunavant
Sent electronically to dunavanta@email.sc.edu

PERSONAL AND CONFIDENTIAL

Regarding Case Number: 2015021301

Dear Ms. Dunavant,

We have contacted Dr. Voros to apprise him of our investigation; however, we have not heard from him at this point. We have made a second attempt to have him respond. Without a response our investigation may move forward without him.

In the meantime, I will schedule a meeting with your academic Department to explore options to ensure that during the course of our investigation or the course of next semester your contact with Dr. Voros will be limited or restricted. I will confer with them about possibilities for your coursework. Please call me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Carl R. Wells".

Carl R. Wells
Asst. Dir. EOP

CC: Henry White, University Lawyer

July 22, 2016

Allison Dunavant
Sent electronically to dunavana@email.sc.edu

PERSONAL AND CONFIDENTIAL

Regarding Case Number: 2015021301

Dear Ms. Dunavant,

I have spoken with your department. The School of Visual Arts and Design has agreed to work with you to develop a plan to ensure your continued matriculation; the goal is to develop a plan to ensure that Dr. Voros will not have grading control or supervision over any aspects of your academic career during the duration of your time at the University of South Carolina.

Please contact Dr. Andrew Graciano to schedule a meeting in the very near future. He is expecting your call. Also, please give me a call if you have any questions (803) 777-9560 or wellsr@mailbox.sc.edu. I will also be in touch with you to update you on the status of the EOP process.

Sincerely,



Carl R. Wells
Asst. Dir. EOP

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

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Office of Equal Opportunity Programs

Dunavant v. Voros

THE BRITTAIN LAW FIRM, P.A.

ATTORNEYS AT LAW

4614 OLEANDER DRIVE

MYRTLE BEACH, SOUTH CAROLINA 29577

THOMAS C. BRITTAIN
 MARY MADISON BRITTAIN LANGWAY
 A. PRESTON BRITTAIN
 T. CASE BRITTAIN, JR.

843-449-8562
 FAX 843-497-6124
www.brittainlawfirm.com

June 9, 2016

Via First Class Mail

University of South Carolina
 ATTN: Office of Equal Opportunity Programs
 1600 Hampton Street, Suite 805
 Columbia, SC 29208

Re: Allison Dunavant, Graduate Student

To Whom it May Concern:

Please be advised I have been retained to represent Allison Dunavant. Enclosed please find a Notice of Harassment/Discrimination Complaint with attachments for your review.

Please contact me upon your receipt of the same to discuss. I look forward to hearing from you. Thank you.

Sincerely yours,

THE BRITTAIN LAW FIRM, P.A.



A. Preston Brittain
 APB.meb

Enclosures

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Office of Equal Opportunity Programs

Dunavant v. Veros

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Notice of Harassment/Discrimination Complaint

Directions: If you believe that you have been unlawfully harassed/discriminated against, please fill out this form and return it to the Office of Equal Opportunity Programs. If more space is necessary, please continue your comments on the back of this form. You may also complete an online form on our website.

Name: Allison Dunavant Date of Complaint: 06/08/16

Department: SI/AD McMaster Title: GRAD STUDENT

Campus Address

Home Address:

Home Telephone:

Cell.

Interviewed by: DALE MOORE, DENNIS MATT, ALLEN MCGEE

Basis of Discrimination: Sex(Gender) Race Color Retaliation Age Religion

National Origin Disability Sexual Orientation Marital or Veteran Status or any other legally protected classification.

Individual(s) who you feel committed harassment/discrimination:

a.) Diego DAVID Vargas

b.) ALLEN MILLER

c.) _____

1. Describe the nature of your complaint. Include dates and as much detail as possible.
SEE ATTACHED.

2. Why do you believe this action was taken against you?

Retaliated against because I did not meet Prof. Ulrich's wife standards; i.e., could not keep up with the other male students. Cody Lankford & Antonio Griffin.

Retaliated against because I caused the University to become aware of his mistreatment of me.

3. Identify all employees/students/or others with knowledge of the conduct about which you are complaining:

Alex Miller, David Vass

Return To:
Office of Equal Opportunity Programs
1600 Hampton Street, Suite 805
Columbia, SC 29208
(F) (803) 777-2296 (T) (803) 777-3854

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Office of Equal Opportunity Programs

Dunavant v. Voros

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Page Two
 Harassment/Discrimination
 Complaint Form

4. Did employees/students/or others listed on the previous page personally observe or overhear the alleged conduct? If yes, please indicate the dates of observed/overheard behavior.

Some of the conduct was witnessed by the others to include:

① exclusion from meals ② verbal harassment/intimidation ③ work conditions

5. Are there documents or emails which contain information supporting the occurrences described above?

① Emails

② Photographs of living arrangements + work conditions

6. Is there any physical evidence that supports your complaint? If so, please describe or attach a copy.

See above.

7. Have you missed any work time/class time as a result of the alleged harassment/discrimination? If yes, please indicate dates of absences.

Misled about educational opportunity in Italy. Left one week early from the short program due to Prof. misconduct.

8. Have you received any counseling or received medical treatment as a result of this alleged harassment? If yes, indicate dates of counseling/treatment.

Yes. Visited family physician related to distress conditions and symptoms.

Would like referral to CCC or other counseling near my residence in the Myrtle Beach area.

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Office of Equal Opportunity Programs

Dunavant v. Voros

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Harassment/Discrimination
Complaint Form

9. Have you previously complained about this or related acts of illegal harassment/discrimination to a University supervisor or official? If so, please identify the individual to whom you complained, the date of the complaint and the resolution of your complaint.

Yes. Complained to Dale Moore, Dennis Prait, Allen Miller and campus police (campus police contacted by my mother Eileen). I was directed to file a complaint.

10. What is your requested remedy in this complaint?

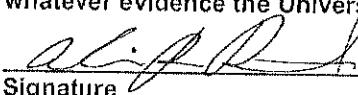
I would like an opportunity to complete my Masters without any fear of interference from Prof. Voros. It is unfortunately an impossibility given I cannot complete my education without taking a class from him. In addition, he controls/runs the classes and has great influence over the program/department. Removing Prof. Voros would remedy my concern.

11. Are there any other individuals you want the University to contact regarding your complaint? If so, who do you wish contacted and why?

Andrew Graziano. Peter Chame茨ky.

Acknowledgment

To investigate your complaint, it will be necessary to interview you, the alleged harasser(s), and any witnesses with knowledge of the allegations or defenses. The University will notify all persons involved in the investigation that it is confidential and that unauthorized disclosures of information concerning the investigation could result in disciplinary action, up to and including termination of employment/student status. The information provided in this complaint is true and correct to the best of my knowledge. I am willing to cooperate fully in the investigation of my complaint and provide whatever evidence the University deems relevant.

 Signature

06/08/16

h:sexhr/compform.doc - 09/06/13
Original: EOP Case File
cc:Faculty/Staff EOP Manual

EOP Office Use Only

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Office of Equal Opportunity Programs

Dunavant v. Voros

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Date of Alleged Violation: ___/___/___

Person Filing Charge: _____

Place of Alleged Violation: _____

Employment Discrimination Under:

Age Discrimination in Employment Act of 1967
 Americans with Disabilities Act of 1990
 Executive order 13145
 Title VII of the Civil Rights Act of 1964
 Pregnancy Discrimination Act of 1973
 Title IX of the Education Amendments of 1972
 Title VI of the Civil Rights Act of 1964
 Veterans' Readjustment Act of 1974

Student Discrimination Under:

Age Discrimination in Employment Act of 1967
 Americans with Disabilities Act of 1990
 Executive order 13145
 Title VII of the Civil Rights Act of 1964
 Pregnancy Discrimination Act of 1973
 Title IX of the Education Amendments of 1972
 Title VI of the Civil Rights Act of 1964
 Veterans' Readjustment Act of 1974

Basis of Discrimination: Sex(Gender) Race Color Retaliation Age Religion Creed National Origin Disability Sexual Orientation Marital or Veteran Status or any other legally protected classification.

Circumstances of Alleged Violation:

Date: ___/___/___

Printed Name of Authorized University Official

Signature of Authorized University Official

h:sexhr/compform.doc - 09/06/13
Original: EOP Case File
cc:Faculty/Staff EOP Manual

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Office of Equal Opportunity Programs

Dunavant v. Voros



UNIVERSITY OF
SOUTH CAROLINA

EOP CASE #2015021301

Emails

USC - 0172

From: MILLER, ALLEN
To: VOROS, DAVID
Cc: ; Alex Bonta; WIERTS, TRUDIE; GABEL, JOAN; PARHAM, TERRY; PRUITT SR., DENNIS; WELLS, CARL;
DOERPINGHAUS, HELEN
Subject: Re: Events in Monte Castello
Date: Thursday, May 19, 2016 1:46:30 AM

Dear David,

Thank you for this account. Allison is now at home.

Allen

--
Paul Allen Miller

Vice Provost and Director of Global Carolina
Carolina Distinguished Professor of Classics and Comparative Literature

On 5/18/16, 6:57 PM, "VOROS, DAVID" <VOROS@mailbox.sc.edu> wrote:

>Dear Allen,
 >
 >As per your request, I am providing below the circumstances regarding the
 >situation in Italy with Allison Dunavant.
 >
 >After speaking with Allison prior to her departure and reflecting on
 >circumstances surrounding these issues, my opinion and - as described
 >later in this account, the perspective of others who witnessed our
 >interactions - is that Allison's version of events, as well as her
 >understanding of her verbal agreement with ICA does not accurately
 >represent what transpired. Nonetheless, I feel that both I - and ICA as a
 >whole - have acted rationally, responsibly, and appropriately in
 >addressing the situation. Further, that we have acted in a way that is in
 >keeping with company protocols developed in context of both U.S. and
 >Italian labor law.
 >
 >In terms of background, I should point out first that it has long been a
 >tradition with the art school in Monte Castello to provide working
 >scholarships for students as a means of helping talented students from
 >less affluent families study in Italy. As I expressed to you numerous
 >times, coming myself from a family of limited means and thus unable to
 >study abroad, this is a particular mission of mine. However, this is also
 >a common practice among artist residencies around the world and I invite
 >you to search Artist Residences in Italy and you will soon find among the
 >many options: working scholarships. At ICA, we will provide six of these
 >opportunities for students from diverse institutions and for varying
 >periods of time in the course of the summer. Despite our objective at ICA
 >to provide opportunities to disadvantaged students however, common sense
 >would dictate that as an employer and business-person, I must also be
 >vigilant to the needs of our company and coordinate things in an
 >effective manner. This includes notifying employees if their performance
 >is sub-standard. I believe this is not only entirely reasonable, but

>expected.

>

>Regarding the current situation with USC students: ICA offered working
>scholarships to 3 students from USC: two graduate students and one
>undergraduate student. All three sought to participate in the USC in
>Italy program, however all were unable to find sufficient financial
>support for their endeavor. One student's need was so great in fact, (in
>contrast to his initiative) that we also elected to purchase his
>transatlantic plane ticket.

>

>This spring, one of the USC students, Allison Dunavant, came to me
>complaining that as a graduate student, there were no sources of aid
>available to her through USC Study Abroad. As you recall, I referred her
>to you. Your advice (according to my recollection) was for Allison to
>seek funding through the department or college. With this in mind, I
>advised her to apply for CAS funding and assisted her in applying for a
>CAS scholarship for grad students. Together with my colleague, Andrew
>Graciano (whose input I encourage you to seek), coordinator of our grad
>program in SVAD at USC, I recommended her for the funding. Andrew also
>recommended her for another grant, for which I provided a letter of
>support to the college.

>

>Ultimately, because I felt that these three were serious and committed
>students I met with them together in mid-March off-campus and I told them
>of the opportunities for work-study scholarships provided by ICA. In
>this case, their activities would be in preparation for the USC group on
>May 23.

>

>The situation our company offered them was that in exchange for working
>five hours per day, five days per week, ICA would provide accommodations,
>meals, and studio space for them. I made it clear that during their
>off-time, they could travel at their own expense, but that sometimes they
>could also accompany me on errands to locations that could be of interest
>to them and to remain there (again returning at their own expense) on
>week end, without reservation. At the time, we discussed the parameters
>of their duties and obligations at length., I will also point out that
>we had numerous meetings together after the groups arrival to confirm the
>implementation of this schedule in terms of daily events. I feel quite
>confident that after speaking with the rest of the group that they were
>clear on the parameters of the arrangement.

>

>Upon the students arrival - and until Friday - all seemed to be going
>according to plan and all seemed satisfied. The group was assigned tasks
>around the building that included painting walls and cleaning as
>previously agreed. The work was not particularly strenuous and no one
>expressed complaints or indicated any health issues that would hinder the
>performance of their duties. Overall, the group was clearly enjoying the
>experience and were also producing artwork, which we discussed as a
>group. In the course of my own activities, I took them to visit museums
>in Perugia and Assisi, where we spoke together about masterpieces in the
>collections. Throughout their stay they had been provided meals, which we
>prepared communally, which we will continue to do until our kitchen opens
>on Thursday.

>

>In the course of their stay thus far, I have met with the group
>frequently and discussed the workload and conditions (as we continue to
>do) and to plan future activities - all seemed agreeable that it was a

>fair arrangement and in keeping with our verbal agreement and their
 >expectations. Allison was of course engaged in this discussion and
 >expressed no reservations about the type of work she was assigned or the
 >workload, nor did she at any time advise me of any health concerns that
 >would impair her ability to work, or that could otherwise endanger
 >others. Despite the fact that she voiced no objections to the work or
 >workload to me directly, several students expressed to me that Allison
 >told them that if I wanted certain work done (such as cleaning) I should
 >do it myself. Following our Thursday meeting, two of the students came to
 >me afterward expressing frustration that they felt Allison was not doing
 >her share of work and placing additional burden on them to complete their
 >tasks. Both expressed that were frustrated that Allison seemed to be
 >spending a lot of time on the phone and that her work pace was erratic.
 >I spoke to her about this and also advised my assistant, Alexandra to
 >more closely monitor Allison's work progress and to assign appropriate
 >tasks to what appeared to be in her abilities. Alexandra reported to me
 >that while Allison was argumentative, she agreed to comply.
 >

>I became quite concerned about the situation developing in Monte Castello
 >with her peers and spoke to Allison about her job performance in Monte
 >Castello. In the course of our conversation, Allison agreed to apply
 >herself, but was argumentative. Afterward, other students came to me in
 >confidence and reported that she told them that she did not feel that she
 >needed to acknowledge me as her supervisor and complained that she did
 >not feel a need to do manual labor. This of course seemed strange to me,
 >since I quite clearly explained the activities the group would engage in
 >in exchange for their stay and no one felt his unreasonable.

>
 >On Friday Allison failed to show up to work, complaining of a headache.
 >Allison then slept until lunch and then afterward spent the remainder of
 >the day packing for the weekend trip to Rome while the other students
 >worked. Allison appeared to be in good health and spirits at that time.
 >The other students appeared quite agitated about the situation and
 >complained. Consequently, I asked Alexandra to speak to Allison again
 >when the group returned from their trip on Saturday.
 >

>
 >On Friday afternoon, since I had business in Rome, I agreed to take the
 >students to a suburban Rome location from which they could take a bus
 >into the city. My colleagues, Eros, our general manager and Alexandra our
 >staff manager, and I dropped them off at a central bus station where
 >they could find transport to their hotel in Rome, where I had made a
 >booking for them (Best Western Canada). Alex, Eros, and I walked with
 >them to the bus stop to be sure they got on the correct bus. I provided
 >them with a map and an itinerary for Rome and specific instructions on
 >how to find their hotel as well as information regarding their return
 >trip.
 >

>
 >The group was instructed that upon arrival at the bus station at Rome
 >Termini, they would enter the station and in passing through en route to
 >their hotel, they would confirm their return schedule and email me the
 >details. (In our departure conversation, we emphasized that they should
 >check the return schedule because they would have to transfer trains on
 >their return at the city of Terni, about 45 minutes drive from Monte
 >Castello and the small train line to Monte Castello provided limited
 >service in the late night hours.) I told them quite specifically about
 >ICA's policies regarding off-campus travel and they were clear that if
 >they could not make their connection, they would remain in Terni overnight.

>
>Nonetheless, they failed to check the schedule and did not look into the
>departure times of the connecting train until they reached Terni. As a
>result, the group was stranded at Terni on Saturday night. They informed
>me by phone that they had missed the train at approximately 8:00 PM. As
>per our discussion, I told them that they had two options:
>

- >1. Stay at a hotel in Terni and continue on the next day
- >
- >2. Our driver could pick them up at Terni for €20 per person. (The
>payment is made directly to our driver, Carlo Innocenti and is a very
>reasonable rate.)
- >

>They decided to stay in Terni and continue on the next day. Later that
>night however, I received two emails from Allison that I found most
>inappropriate in tone and disrespectful. I have forwarded these messages
>to you. In summary, she indicated her frustration that I was not willing
>to pick them up in Terni after 9:00 PM (a 45minute drive each way, door
>to door. I calculate an additional 15 minutes on each end for loading
>and traffic and thus this represents a two – hour drive.) Allison
>appeared incensed that I refused to do so. In fact, she sent me a message
>that I felt to be quite sarcastic in tone, accompanied by driving maps
>and driving times (to show me how simply I might have gotten there to
>pick them up apparently). The fact that she failed to calculate the
>round-trip time is in my estimation significant. She also suggested that
>they might have taken a bus to the nearby town of Todi, which arrived at
>about 1:00 AM and that I should pick them up there when it arrived. I
>did not reply to the latter.

>
>It came as a great surprise and concern to me that in the course of her
>correspondence on the above matter, Allison also revealed to me that she
>was an epileptic and subject to severe migraines. She had never expressed
>this to me before that point.

>
>On Sunday, the group contacted me, indicating that they would arrive at
>the nearby Fratta Todina station at 2:00 PM. With this objective in mind,
>I drove to the station and waited for over an hour before I received a
>call on my cell indicating that they had again missed their train and
>that they would arrive at 4:00 PM. Since I had business in Perugia I
>drove there and returned to Fratta just after 4:00. Unfortunately,
>instead of waiting, Allison insisted on walking up the hill to Monte
>Castello (45 minutes in good weather). Regrettably, they did not contact
>me with this plan change and proceeded up the hill. At the train station
>meanwhile, I waited for over an hour before she became fatigued with her
>walk and insisted that the other students call me. Approximately half-way
>in their path up our mountain, I received a call from one of the students
>asking us to pick them up. Since we were at the nearby train station, we
>arrived quickly. Upon locating the group at the side of the road we
>pulled over and parked. I told the group that before proceeding further
>we needed to discuss the situation with their weekend travel and the fact
>that I had spent several hours driving around looking for them. Allison
>complained that they could not reach me by phone, and thus could not
>contact me. This is strange since my phone was working and I was
>receiving calls. My call log showed no missed calls or messages, nor did
>I receive any email correspondence from them, save Allison's emails of
>complaint I described earlier. The latter clearly had no difficulties
>finding me. All three students travelling together had working cell

>phones.

>

>I spoke to the group (then gathered in a parking area on the roadside)
>firmly and clearly about the situation. No one present expressed concerns
>about my tone or language, although I was understandably angry at the
>situation. As their supervisor, I notified the group that before
>proceeding up the hill we needed to have a discussion about policies and
>about hotels. I also told Allison that her tone in the emails was
>unacceptable and that if she did not change her behavior that we had no
>recourse but to tell her to pack her bags and go to the hotel next door
>for the remainder of her stay. She became incensed at this and told me:
>“I am about to get mad!” She then stormed off and sat on the guardrail
>about 20 feet from where we were parked. Feeling concern for her safety
>and that of the group, I instructed the other students to get in the car.
>I got in the car as well and asked my assistant Alexandra to speak to her
>and convince her to get in the car and ride up to the village with us and
>to further inform Allison that she (Alexandra) would accompany her to the
>school while she packed her bags and then would accompany her to the
>hotel in order to make sure she was able to check in. We waited without
>moving the car for about twenty minutes while Alexandra spoke to her.
>Alex returned to the car to inform me that Alison was quite agitated and
>that she refused to get in the car. After waiting for another ten
>minutes while Alex spoke to her a friend from the village drove by and
>Alex asked him to drive Allison up to the village. Allison accepted and
>they drove together to Monte Castello.

>

>Upon reaching Monte Castello, Alexandra accompanied Allison, attempting
>to calm her down. In the course of the next hour or so, Allison
>telephoned her mother while Alexandra was present and Allison’s mother
>asked to speak to her as a representative of ICA. I did not witness
>this, however Alexandra reported to me that Allison’s mother was hostile
>and raised her voice to a level at which it made it necessary for
>Alexandra to inform the mother that if she did not moderate her tone, she
>would terminate the call. In the course of her conversation, Alexandra
>attempted to assure the mother that everything was safe, but that given
>the situation however, that we were well within our rights to insist that
>Allison leave the premises and move to the hotel if she did not moderate
>her behavior.

>

>Ultimately, Allison returned to the ICA premises assuring Alex that she
>would moderate her tone. Allison chose to remain in her room for the
>remainder of the night. We sent dinner for her to her room.

>

>The next morning, I asked Allison to come to the office (while I was
>accompanied by our manager, Eros Tassi) and I attempted to explain our
>position and policies. Allison almost immediately became confrontational
>and indicated that she did not work for me and that regardless of what
>others thought the parameters of the situation to be, she did not share
>the perception that she should be required to do manual labor. She
>indicated that she did not feel comfortable talking to me and that she
>was going to her room. When my assistant Alexandra arrived, I asked her
>to speak to Allison and try to reason with her. However in going to her
>room, Alexandra reported that Allison refused to speak to her and had
>locked herself in her room. She remained in this situation for a couple
>hours. Out of concern with the situation, I contacted our attorney, Alex
>Bonta in order to get advice on how to address the situation within the
>parameters of Italian law. Alex advised me that if Allison refused to

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Office of Equal Opportunity Programs

Dunavant v. Voros

>leave the room and was not responding, I should contact the local police
>and ask them to address the situation. This became unnecessary however
>when Allison came downstairs from her room.

>

>After speaking with you on the phone, I informed Allison that I felt that
>the best situation for her would be to continue to stay in our facilities
>for the remainder of her trip, without the obligation to work. I advised
>her that she could take her meals at the hotel at her own expense. She
>seemed quite comfortable with the situation and returned to her room.

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>A short while later I received a phone call from you indicating that USC
>would book a ticket for Allison and that she had chosen to leave early.
>As you know we arranged a hotel room for her and provided transport the
>next morning. She arrived at FCO by 8 AM.

>

>I hope that the above will help in understanding more clearly the
>situation.

>

>David

>

USC - 0178

From: WELLS, CARL
To: MILLER, ALLEN; VOROS, DAVID
Cc: Alex Bonta; WIERTS, TRUDIE; GABEL, JOAN; PARHAM, TERRY; PRUITT SR., DENNIS; DOERPINGHAUS, HELEN
Subject: RE: Events in Monte Castello
Date: Thursday, May 19, 2016 10:23:00 AM

Thanks for the update Dr. Miller.

At this point it appears that there is no allegation of Title IX violations or any other protected class issues (Based upon the mother's statement and David's summary). If you are in concurrence this, then EOP will close its files in regard to this matter and defer to the Office of the Provost's determination.

Please advise!

THANKS!

Carl R. Wells, PhD
 Assistant Director, Office of Equal Opportunity Programs
 Deputy Title IX Coordinator

Office of Equal Opportunity Programs
 1600 Hampton Street, Suite 805
 Columbia, SC 29208
 (W) (803) 777-9560
 (Fax) (803) 777-2296
www.sc.edu/eop

-----Original Message-----

From: MILLER, ALLEN
 Sent: Thursday, May 19, 2016 1:46 AM
 To: VOROS, DAVID <VOROS@mailbox.sc.edu>
 Cc: <icarts.info@gmail.com>; Alex Bonta <info@avvocati.us>; WIERTS, TRUDIE <WIERTS@mailbox.sc.edu>; GABEL, JOAN <GABELJ@mailbox.sc.edu>; PARHAM, TERRY <TERRY@mailbox.sc.edu>; PRUITT SR., DENNIS <DPRUITT@mailbox.sc.edu>; WELLS, CARL <WELLSCR@mailbox.sc.edu>; DOERPINGHAUS, HELEN <DOERPHI@mailbox.sc.edu>
 Subject: Re: Events in Monte Castello

Dear David,

Thank you for this account. Allison is now at home.

Allen

--

Paul Allen Miller

Vice Provost and Director of Global Carolina Carolina Distinguished Professor of Classics and Comparative Literature

On 5/18/16, 6:57 PM, "VOROS, DAVID" <VOROS@mailbox.sc.edu> wrote:

>Dear Allen,
>
>As per your request, I am providing below the circumstances regarding
>the situation in Italy with Allison Dunavant.
>
>After speaking with Allison prior to her departure and reflecting on
>circumstances surrounding these issues, my opinion and - as described
>later in this account, the perspective of others who witnessed our
>interactions - is that Allison's version of events, as well as her
>understanding of her verbal agreement with ICA does not accurately
>represent what transpired. Nonetheless, I feel that both I - and ICA as
>a whole - have acted rationally, responsibly, and appropriately in
>addressing the situation. Further, that we have acted in a way that is
>in keeping with company protocols developed in context of both U.S. and
>Italian labor law.
>
>In terms of background, I should point out first that it has long been
>a tradition with the art school in Monte Castello to provide working
>scholarships for students as a means of helping talented students from
>less affluent families study in Italy. As I expressed to you numerous
>times, coming myself from a family of limited means and thus unable to
>study abroad, this is a particular mission of mine. However, this is
>also a common practice among artist residencies around the world and I
>invite you to search Artist Residencies in Italy and you will soon find
>among the many options: working scholarships. At ICA, we will provide
>six of these opportunities for students from diverse institutions and
>for varying periods of time in the course of the summer. Despite our
>objective at ICA to provide opportunities to disadvantaged students
>however, common sense would dictate that as an employer and
>business-person, I must also be vigilant to the needs of our company
>and coordinate things in an effective manner. This includes notifying
>employees if their performance is sub-standard. I believe this is not
>only entirely reasonable, but expected.
>
>Regarding the current situation with USC students: ICA offered working
>scholarships to 3 students from USC: two graduate students and one
>undergraduate student. All three sought to participate in the USC in
>Italy program, however all were unable to find sufficient financial
>support for their endeavor. One student's need was so great in fact,
>(in contrast to his initiative) that we also elected to purchase his
>transatlantic plane ticket.
>
>This spring, one of the USC students, Allison Dunavant, came to me
>complaining that as a graduate student, there were no sources of aid
>available to her through USC Study Abroad. As you recall, I referred
>her to you. Your advice (according to my recollection) was for Allison
>to seek funding through the department or college. With this in mind, I
>advised her to apply for CAS funding and assisted her in applying for a
>CAS scholarship for grad students. Together with my colleague, Andrew
>Graciano (whose input I encourage you to seek), coordinator of our grad

>program in SVAD at USC, I recommended her for the funding. Andrew also
 >recommended her for another grant, for which I provided a letter of
 >support to the college.
 >
 >Ultimately, because I felt that these three were serious and committed
 >students I met with them together in mid-March off-campus and I told
 >them of the opportunities for work-study scholarships provided by ICA.
 >In this case, their activities would be in preparation for the USC
 >group on May 23.
 >
 >The situation our company offered them was that in exchange for working
 >five hours per day, five days per week, ICA would provide
 >accommodations, meals, and studio space for them. I made it clear that
 >during their off-time, they could travel at their own expense, but that
 >sometimes they could also accompany me on errands to locations that
 >could be of interest to them and to remain there (again returning at
 >their own expense) on week end, without reservation. At the time, we
 >discussed the parameters of their duties and obligations at length., I
 >will also point out that we had numerous meetings together after the
 >groups arrival to confirm the implementation of this schedule in terms
 >of daily events. I feel quite confident that after speaking with the
 >rest of the group that they were clear on the parameters of the arrangement.
 >
 >Upon the students arrival - and until Friday - all seemed to be going
 >according to plan and all seemed satisfied. The group was assigned
 >tasks around the building that included painting walls and cleaning as
 >previously agreed. The work was not particularly strenuous and no one
 >expressed complaints or indicated any heath issues that would hinder
 >the performance of their duties. Overall, the group was clearly
 >enjoying the experience and were also producing artwork, which we
 >discussed as a group. In the course of my own activities, I took them
 >to visit museums in Perugia and Assisi, where we spoke together about
 >masterpieces in the collections. Throughout their stay they had been
 >provided meals, which we prepared communally, which we will continue to
 >do until our kitchen opens on Thursday.
 >
 >In the course of their stay thus far, I have met with the group
 >frequently and discussed the workload and conditions (as we continue to
 >do) and to plan future activities - all seemed agreeable that it was a
 >fair arrangement and in keeping with our verbal agreement and their
 >expectations. Allison was of course engaged in this discussion and
 >expressed no reservations about the type of work she was assigned or
 >the workload, nor did she at any time advise me of any heath concerns
 >that would impair her ability to work, or that could otherwise endanger
 >others. Despite the fact that she voiced no objections to the work or
 >workload to me directly, several students expressed to me that Allison
 >told them that if I wanted certain work done (such as cleaning) I
 >should do it myself. Following our Thursday meeting, two of the
 >students came to me afterward expressing frustration that they felt
 >Allison was not doing her share of work and placing additional burden
 >on them to complete their tasks. Both expressed that were frustrated
 >that Allison seemed to be spending of lot of time on the phone and that her work pace was erratic.
 >I spoke to her about this and also advised my assistant, Alexandra to
 >more closely monitor Allison's work progress and to assign appropriate
 >tasks to what appeared to be in her abilities. Alexandra reported to me
 >that while Allison was argumentative, she agreed to comply.
 >

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>I became quite concerned about the situation developing in Monte
 >Castello with her peers and spoke to Allison about her job performance
 >in Monte Castello. In the course of our conversation, Allison agreed to
 >apply herself, but was argumentative. Afterward, other students came to
 >me in confidence and reported that she told them that she did not feel
 >that she needed to acknowledge me as her supervisor and complained that
 >she did not feel a need to do manual labor. This of course seemed
 >strange to me, since I quite clearly explained the activities the group
 >would engage in in exchange for their stay and no one felt his unreasonable.
 >
 >On Friday Allison failed to show up to work, complaining of a headache.
 >Allison then slept until lunch and then afterward spent the remainder
 >of the day packing for the weekend trip to Rome while the other
 >students worked. Allison appeared to be in good health and spirits at that time.
 >The other students appeared quite agitated about the situation and
 >complained. Consequently, I asked Alexandra to speak to Allison again
 >when the group returned from their trip on Saturday.
 >
 >On Friday afternoon, since I had business in Rome, I agreed to take the
 >students to a suburban Rome location from which they could take a bus
 >into the city. My colleagues, Eros, our general manager and Alexandra
 >our staff manager, and I dropped them off them at a central bus station
 >where they could find transport to their hotel in Rome, where I had
 >made a booking for them (Best Western Canada). Alex, Eros, and I walked
 >with them to the bus stop to be sure they got on the correct bus. I
 >provided them with a map and an itinerary for Rome and specific
 >instructions on how to find their hotel as well as information regarding their return
 >trip.
 >
 >The group was instructed that upon arrival at the bus station at Rome
 >Termini, they would enter the station and in passing through en route
 >to their hotel, they would confirm their return schedule and email me
 >the details. (In our departure conversation, we emphasized that they
 >should check the return schedule because they would have to transfer
 >trains on their return at the city of Terni, about 45 minutes drive
 >from Monte Castello and the small train line to Monte Castello provided
 >limited service in the late night hours.) I told them quite
 >specifically about ICA's policies regarding off-campus travel and they
 >were clear that if they cold not make their connection, they would remain in Terni overnight.
 >
 >Nonetheless, they failed to check the schedule and did not look into
 >the departure times of the connecting train until they reached Terni.
 >As a result, the group was stranded at Terni on Saturday night. They
 >informed me by phone that they had missed the train at approximately
 >8:00 PM. As per our discussion, I told them that they had two options:
 >
 >1. Stay at a hotel in Terni and continue on the next day
 >
 >2. Our driver could pick them up at Terni for €20 per person. (The
 >payment is made directly to our driver, Carlo Innocenti and is a very
 >reasonable rate.)
 >
 >They decided to stay in Terni and continue on the next day. Later that
 >night however, I received two emails from Allison that I found most
 >inappropriate in tone and disrespectful. I have forwarded these
 >messages to you. In summary, she indicated her frustration that I was
 >not willing to pick them up in Terni after 9:00 PM (a 45minute drive

>each way, door to door. I calculate an additional 15 minutes on each
>send for loading and traffic and thus this represents a two – hour
>drive.) Allison appeared incensed that I refused to do so. In fact, she
>sent me a message that I felt to be quite sarcastic in tone,
>accompanied by driving maps and driving times (to show me how simply I
>might have gotten there to pick them up apparently). The fact that she
>failed to calculate the round-trip time is in my estimation
>significant. She also suggested that they might have taken a bus to
>the nearby town of Todi, which arrived at about 1:00 AM and that I
>should pick them up there when it arrived. I did not reply to the latter.
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>correspondence on the above matter, Allison also revealed to me that
>she was an epileptic and subject to severe migraines. She had never
>expressed this to me before that point.
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>On Sunday, the group contacted me, indicating that they would arrive at
>the nearby Fratta Todina station at 2:00 PM. With this objective in
>mind, I drove to the station and waited for over an hour before I
>received a call on my cell indicating that they had again missed their
>train and that they would arrive at 4:00 PM. Since I had business in
>Perugia I drove there and returned to Fratta just after 4:00.
>Unfortunately, instead of waiting, Allison insisted on walking up the
>hill to Monte Castello (45 minutes in good weather). Regrettably, they
>did not contact me with this plan change and proceeded up the hill. At
>the train station meanwhile, I waited for over an hour before she
>became fatigued with her walk and insisted that the other students call
>me. Approximately half-way in their path up our mountain, I received a
>call from one of the students asking us to pick them up. Since we were
>at the nearby train station, we arrived quickly. Upon locating the
>group at the side of the road we pulled over and parked. I told the
>group that before proceeding further we needed to discuss the situation
>with their weekend travel and the fact that I had spent several hours
>driving around looking for them. Allison complained that they could
>not reach me by phone, and thus could not contact me. This is strange
>since my phone was working and I was receiving calls. My call log
>showed no missed calls or messages, nor did I receive any email
>correspondence from them, save Allison's emails of complaint I
>described earlier. The latter clearly had no difficulties finding me.
>All three students travelling together had working cell phones.
>
>I spoke to the group (then gathered in a parking area on the roadside)
>firmly and clearly about the situation. No one present expressed
>concerns about my tone or language, although I was understandably angry
>at the situation. As their supervisor, I notified the group that before
>proceeding up the hill we needed to have a discussion about policies
>and about hotels. I also told Allison that her tone in the emails was
>unacceptable and that if she did not change her behavior that we had no
>recourse but to tell her to pack her bags and go to the hotel next door
>for the remainder of her stay. She became incensed at this and told me:
>“I am about to get mad!” She then stormed off and sat on the guardrail
>about 20 feet from where we were parked. Feeling concern for her safety
>and that of the group, I instructed the other students to get in the car.
>I got in the car as well and asked my assistant Alexandra to speak to
>her and convince her to get in the car and ride up to the village with
>us and to further inform Allison that she (Alexandra) would accompany
>her to the school while she packed her bags and then would accompany

>her to the hotel in order to make sure she was able to check in. We
 >waited without moving the car for about twenty minutes while Alexandra spoke to her.
 >Alex returned to the car to inform me that Alison was quite agitated
 >and that she refused to get in the car. After waiting for another ten
 >minutes while Alex spoke to her a friend from the village drove by and
 >Alex asked him to drive Allison up to the village. Allison accepted
 >and they drove together to Monte Castello.
 >
 >Upon reaching Monte Castello, Alexandra accompanied Allison, attempting
 >to calm her down. In the course of the next hour or so, Allison
 >telephoned her mother while Alexandra was present and Allison's mother
 >asked to speak to her as a representative of ICA. I did not witness
 >this, however Alexandra reported to me that Allison's mother was
 >hostile and raised her voice to a level at which it made it necessary
 >for Alexandra to inform the mother that if she did not moderate her
 >tone, she would terminate the call. In the course of her conversation,
 >Alexandra attempted to assure the mother that everything was safe, but
 >that given the situation however, that we were well within our rights
 >to insist that Allison leave the premises and move to the hotel if she
 >did not moderate her behavior.
 >
 >Ultimately, Allison returned to the ICA premises assuring Alex that she
 >would moderate her tone. Allison chose to remain in her room for the
 >remainder of the night. We sent dinner for her to her room.
 >
 >The next morning, I asked Allison to come to the office (while I was
 >accompanied by our manager, Eros Tassi) and I attempted to explain our
 >position and policies. Allison almost immediately became
 >confrontational and indicated that she did not work for me and that
 >regardless of what others thought the parameters of the situation to
 >be, she did not share the perception that she should be required to do
 >manual labor. She indicated that she did not feel comfortable talking
 >to me and that she was going to her room. When my assistant Alexandra
 >arrived, I asked her to speak to Allison and try to reason with her.
 >However in going to her room, Alexandra reported that Allison refused
 >to speak to her and had locked herself in her room. She remained in
 >this situation for a couple hours. Out of concern with the situation,
 >I contacted our attorney, Alex Bonta in order to get advice on how to
 >address the situation within the parameters of Italian law. Alex
 >advised me that if Allison refused to leave the room and was not
 >responding, I should contact the local police and ask them to address
 >the situation. This became unnecessary however when Allison came downstairs from her room.
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 >After speaking with you on the phone, I informed Allison that I felt
 >that the best situation for her would be to continue to stay in our
 >facilities for the remainder of her trip, without the obligation to
 >work. I advised her that she could take her meals at the hotel at her
 >own expense. She seemed quite comfortable with the situation and returned to her room.
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 >A short while later I received a phone call from you indicating that
 >USC would book a ticket for Allison and that she had chosen to leave early.
 >As you know we arranged a hotel room for her and provided transport the
 >next morning. She arrived at FCO by 8 AM.
 >
 >I hope that the above will help in understanding more clearly the
 >situation.
 >

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Office of Equal Opportunity Programs

Dunavant v. Voros

>David
>

USC - 0185

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Dunavant v. Voros

From: MILLER, ALLEN
To: WELLS, CARL
Cc: VOROS, DAVID; Alex Bonta; WIERTS, TRUDIE; GABEL, JOAN; PARHAM, TERRY; PRUITT SR., DENNIS; DOERPINGHAUS, HELEN
Subject: Re: Events In Monte Castello
Date: Thursday, May 19, 2016 10:49:26 AM

Agreed.

Thanks

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

> On May 19, 2016, at 6:23 PM, WELLS, CARL <WELLSCR@mailbox.sc.edu> wrote:
 >
 > Thanks for the update Dr. Miller.
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 > At this point it appears that there is no allegation of Title IX violations or any other protected class issues (Based upon the mother's statement and David's summary). If you are in concurrence this, then EOP will close its files in regard to this matter and defer to the Office of the Provost's determination.
 >
 > Please advise!
 >
 > THANKS!
 >
 > Carl R. Wells, PhD
 > Assistant Director, Office of Equal Opportunity Programs
 > Deputy Title IX Coordinator
 >
 > Office of Equal Opportunity Programs
 > 1600 Hampton Street, Suite 805
 > Columbia, SC 29208
 > (W) (803) 777-9560
 > (Fax) (803) 777-2296
 > www.sc.edu/eop
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 > -----Original Message-----
 > From: MILLER, ALLEN
 > Sent: Thursday, May 19, 2016 1:46 AM
 > To: VOROS, DAVID <VOROS@mailbox.sc.edu>
 > Cc: , <icarts.info@gmail.com>; Alex Bonta <info@avvocati.us>; WIERTS, TRUDIE
 <WIERTS@mailbox.sc.edu>; GABEL, JOAN <GABELJ@mailbox.sc.edu>; PARHAM, TERRY
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 >
 >
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 >> business-person, I must also be vigilant to the needs of our company
 >> and coordinate things in an effective manner. This includes notifying
 >> employees if their performance is sub-standard. I believe this is not
 >> only entirely reasonable, but expected.
 >>
 >> Regarding the current situation with USC students: ICA offered working
 >> scholarships to 3 students from USC: two graduate students and one
 >> undergraduate student. All three sought to participate in the USC in
 >> Italy program, however all were unable to find sufficient financial
 >> support for their endeavor. One student's need was so great in fact,

>> (in contrast to his initiative) that we also elected to purchase his
>> transatlantic plane ticket.

>>

>> This spring, one of the USC students, Allison Dunavant, came to me
>> complaining that as a graduate student, there were no sources of aid
>> available to her through USC Study Abroad. As you recall, I referred
>> her to you. Your advice (according to my recollection) was for Allison
>> to seek funding through the department or college. With this in mind, I
>> advised her to apply for CAS funding and assisted her in applying for a
>> CAS scholarship for grad students. Together with my colleague, Andrew
>> Graciano (whose input I encourage you to seek), coordinator of our grad
>> program in SVAD at USC, I recommended her for the funding. Andrew also
>> recommended her for another grant, for which I provided a letter of
>> support to the college.

>>

>> Ultimately, because I felt that these three were serious and committed
>> students I met with them together in mid-March off-campus and I told
>> them of the opportunities for work-study scholarships provided by ICA.
>> In this case, their activities would be in preparation for the USC
>> group on May 23.

>>

>> The situation our company offered them was that in exchange for working
>> five hours per day, five days per week, ICA would provide
>> accommodations, meals, and studio space for them. I made it clear that
>> during their off-time, they could travel at their own expense, but that
>> sometimes they could also accompany me on errands to locations that
>> could be of interest to them and to remain there (again returning at
>> their own expense) on week end, without reservation. At the time, we
>> discussed the parameters of their duties and obligations at length., I
>> will also point out that we had numerous meetings together after the
>> groups arrival to confirm the implementation of this schedule in terms
>> of daily events. I feel quite confident that after speaking with the
>> rest of the group that they were clear on the parameters of the arrangement.

>>

>> Upon the students arrival - and until Friday - all seemed to be going
>> according to plan and all seemed satisfied. The group was assigned
>> tasks around the building that included painting walls and cleaning as
>> previously agreed. The work was not particularly strenuous and no one
>> expressed complaints or indicated any heath issues that would hinder
>> the performance of their duties. Overall, the group was clearly
>> enjoying the experience and were also producing artwork, which we
>> discussed as a group. In the course of my own activities, I took them
>> to visit museums in Perugia and Assisi, where we spoke together about
>> masterpieces in the collections. Throughout their stay they had been
>> provided meals, which we prepared communally, which we will continue to
>> do until our kitchen opens on Thursday.

>>

>> In the course of their stay thus far, I have met with the group
>> frequently and discussed the workload and conditions (as we continue to
>> do) and to plan future activities - all seemed agreeable that it was a
>> fair arrangement and in keeping with our verbal agreement and their
>> expectations. Allison was of course engaged in this discussion and
>> expressed no reservations about the type of work she was assigned or
>> the workload, nor did she at any time advise me of any heath concerns
>> that would impair her ability to work, or that could otherwise endanger
>> others. Despite the fact that she voiced no objections to the work or
>> workload to me directly, several students expressed to me that Allison

>> told them that if I wanted certain work done (such as cleaning) I
 >> should do it myself. Following our Thursday meeting, two of the
 >> students came to me afterward expressing frustration that they felt
 >> Allison was not doing her share of work and placing additional burden
 >> on them to complete their tasks. Both expressed that were frustrated
 >> that Allison seemed to be spending of lot of time on the phone and that her work pace was erratic.
 >> I spoke to her about this and also advised my assistant, Alexandra to
 >> more closely monitor Allison's work progress and to assign appropriate
 >> tasks to what appeared to be in her abilities. Alexandra reported to me
 >> that while Allison was argumentative, she agreed to comply.
 >>
 >> I became quite concerned about the situation developing in Monte
 >> Castello with her peers and spoke to Allison about her job performance
 >> in Monte Castello. In the course of our conversation, Allison agreed to
 >> apply herself, but was argumentative. Afterward, other students came to
 >> me in confidence and reported that she told them that she did not feel
 >> that she needed to acknowledge me as her supervisor and complained that
 >> she did not feel a need to do manual labor. This of course seemed
 >> strange to me, since I quite clearly explained the activities the group
 >> would engage in in exchange for their stay and no one felt his unreasonable.
 >>
 >> On Friday Allison failed to show up to work, complaining of a headache.
 >> Allison then slept until lunch and then afterward spent the remainder
 >> of the day packing for the weekend trip to Rome while the other
 >> students worked. Allison appeared to be in good health and spirits at that time.
 >> The other students appeared quite agitated about the situation and
 >> complained. Consequently, I asked Alexandra to speak to Allison again
 >> when the group returned from their trip on Saturday.
 >>
 >> On Friday afternoon, since I had business in Rome, I agreed to take the
 >> students to a suburban Rome location from which they could take a bus
 >> into the city. My colleagues, Eros, our general manager and Alexandra
 >> our staff manager, and I dropped them off them at a central bus station
 >> where they could find transport to their hotel in Rome, where I had
 >> made a booking for them (Best Western Canada). Alex, Eros, and I walked
 >> with them to the bus stop to be sure they got on the correct bus. I
 >> provided them with a map and an itinerary for Rome and specific
 >> instructions on how to find their hotel as well as information regarding their return
 >> trip.
 >>
 >> The group was instructed that upon arrival at the bus station at Rome
 >> Termini, they would enter the station and in passing through en route
 >> to their hotel, they would confirm their return schedule and email me
 >> the details. (In our departure conversation, we emphasized that they
 >> should check the return schedule because they would have to transfer
 >> trains on their return at the city of Terni, about 45 minutes drive
 >> from Monte Castello and the small train line to Monte Castello provided
 >> limited service in the late night hours.) I told them quite
 >> specifically about ICA's policies regarding off-campus travel and they
 >> were clear that if they cold not make their connection, they would remain in Terni overnight.
 >>
 >> Nonetheless, they failed to check the schedule and did not look into
 >> the departure times of the connecting train until they reached Terni.
 >> As a result, the group was stranded at Terni on Saturday night. They
 >> informed me by phone that they had missed the train at approximately
 >> 8:00 PM. As per our discussion, I told them that they had two options:
 >>

>> 1. Stay at a hotel in Terni and continue on the next day
 >>
 >> 2. Our driver could pick them up at Terni for €20 per person. (The
 >> payment is made directly to our driver, Carlo Innocenti and is a very
 >> reasonable rate.)
 >>
 >> They decided to stay in Terni and continue on the next day. Later that
 >> night however, I received two emails from Allison that I found most
 >> inappropriate in tone and disrespectful. I have forwarded these
 >> messages to you. In summary, she indicated her frustration that I was
 >> not willing to pick them up in Terni after 9:00 PM (a 45minute drive
 >> each way, door to door. I calculate an additional 15 minutes on each
 >> end for loading and traffic and thus this represents a two – hour
 >> drive.) Allison appeared incensed that I refused to do so. In fact, she
 >> sent me a message that I felt to be quite sarcastic in tone,
 >> accompanied by driving maps and driving times (to show me how simply I
 >> might have gotten there to pick them up apparently). The fact that she
 >> failed to calculate the round-trip time is in my estimation
 >> significant. She also suggested that they might have taken a bus to
 >> the nearby town of Todi, which arrived at about 1:00 AM and that I
 >> should pick them up there when it arrived. I did not reply to the latter.
 >>
 >> It came as a great surprise and concern to me that in the course of her
 >> correspondence on the above matter, Allison also revealed to me that
 >> she was an epileptic and subject to severe migraines. She had never
 >> expressed this to me before that point.
 >>
 >> On Sunday, the group contacted me, indicating that they would arrive at
 >> the nearby Fratta Todina station at 2:00 PM. With this objective in
 >> mind, I drove to the station and waited for over an hour before I
 >> received a call on my cell indicating that they had again missed their
 >> train and that they would arrive at 4:00 PM. Since I had business in
 >> Perugia I drove there and returned to Fratta just after 4:00.
 >> Unfortunately, instead of waiting, Allison insisted on walking up the
 >> hill to Monte Castello (45 minutes in good weather). Regrettably, they
 >> did not contact me with this plan change and proceeded up the hill. At
 >> the train station meanwhile, I waited for over an hour before she
 >> became fatigued with her walk and insisted that the other students call
 >> me. Approximately half-way in their path up our mountain, I received a
 >> call from one of the students asking us to pick them up. Since we were
 >> at the nearby train station, we arrived quickly. Upon locating the
 >> group at the side of the road we pulled over and parked. I told the
 >> group that before proceeding further we needed to discuss the situation
 >> with their weekend travel and the fact that I had spent several hours
 >> driving around looking for them. Allison complained that they could
 >> not reach me by phone, and thus could not contact me. This is strange
 >> since my phone was working and I was receiving calls. My call log
 >> showed no missed calls or messages, nor did I receive any email
 >> correspondence from them, save Allison's emails of complaint I
 >> described earlier. The latter clearly had no difficulties finding me.
 >> All three students travelling together had working cell phones.
 >>
 >> I spoke to the group (then gathered in a parking area on the roadside)
 >> firmly and clearly about the situation. No one present expressed
 >> concerns about my tone or language, although I was understandably angry
 >> at the situation. As their supervisor, I notified the group that before
 >> proceeding up the hill we needed to have a discussion about policies

>> and about hotels. I also told Allison that her tone in the emails was
 >> unacceptable and that if she did not change her behavior that we had no
 >> recourse but to tell her to pack her bags and go to the hotel next door
 >> for the remainder of her stay. She became incensed at this and told me:
 >> "I am about to get mad!" She then stormed off and sat on the guardrail
 >> about 20 feet from where we were parked. Feeling concern for her safety
 >> and that of the group, I instructed the other students to get in the car.
 >> I got in the car as well and asked my assistant Alexandra to speak to
 >> her and convince her to get in the car and ride up to the village with
 >> us and to further inform Allison that she (Alexandra) would accompany
 >> her to the school while she packed her bags and then would accompany
 >> her to the hotel in order to make sure she was able to check in. We
 >> waited without moving the car for about twenty minutes while Alexandra spoke to her.
 >> Alex returned to the car to inform me that Alison was quite agitated
 >> and that she refused to get in the car. After waiting for another ten
 >> minutes while Alex spoke to her a friend from the village drove by and
 >> Alex asked him to drive Allison up to the village. Allison accepted
 >> and they drove together to Monte Castello.
 >>
 >> Upon reaching Monte Castello, Alexandra accompanied Allison, attempting
 >> to calm her down. In the course of the next hour or so, Allison
 >> telephoned her mother while Alexandra was present and Allison's mother
 >> asked to speak to her as a representative of ICA. I did not witness
 >> this, however Alexandra reported to me that Allison's mother was
 >> hostile and raised her voice to a level at which it made it necessary
 >> for Alexandra to inform the mother that if she did not moderate her
 >> tone, she would terminate the call. In the course of her conversation,
 >> Alexandra attempted to assure the mother that everything was safe, but
 >> that given the situation however, that we were well within our rights
 >> to insist that Allison leave the premises and move to the hotel if she
 >> did not moderate her behavior.
 >>
 >> Ultimately, Allison returned to the ICA premises assuring Alex that she
 >> would moderate her tone. Allison chose to remain in her room for the
 >> remainder of the night. We sent dinner for her to her room.
 >>
 >> The next morning, I asked Allison to come to the office (while I was
 >> accompanied by our manager, Eros Tassi) and I attempted to explain our
 >> position and policies. Allison almost immediately became
 >> confrontational and indicated that she did not work for me and that
 >> regardless of what others thought the parameters of the situation to
 >> be, she did not share the perception that she should be required to do
 >> manual labor. She indicated that she did not feel comfortable talking
 >> to me and that she was going to her room. When my assistant Alexandra
 >> arrived, I asked her to speak to Allison and try to reason with her.
 >> However in going to her room, Alexandra reported that Allison refused
 >> to speak to her and had locked herself in her room. She remained in
 >> this situation for a couple hours. Out of concern with the situation,
 >> I contacted our attorney, Alex Bonta in order to get advice on how to
 >> address the situation within the parameters of Italian law. Alex
 >> advised me that if Allison refused to leave the room and was not
 >> responding, I should contact the local police and ask them to address
 >> the situation. This became unnecessary however when Allison came downstairs from her room.
 >>
 >> After speaking with you on the phone, I informed Allison that I felt
 >> that the best situation for her would be to continue to stay in our
 >> facilities for the remainder of her trip, without the obligation to

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>> work. I advised her that she could take her meals at the hotel at her
>> own expense. She seemed quite comfortable with the situation and returned to her room.
>>

>> A short while later I received a phone call from you indicating that
>> USC would book a ticket for Allison and that she had chosen to leave early.
>> As you know we arranged a hotel room for her and provided transport the
>> next morning. She arrived at FCO by 8 AM.

>>

>> I hope that the above will help in understanding more clearly the
>> situation.

>>

>> David

>

USC - 0192

From: DUNAVANT, ALLISON R
To: WELLS, CARL
Subject: Re: Correspondence for Case
Date: Monday, June 20, 2016 7:34:36 PM

Mr. Wells,

I have not heard from you, in any capacity, regarding a good time to speak with you and discuss the next steps regarding the complaint I filed....or to plan a time to meet in person. Either is fine with me. I sent you an email Friday, the 17th, asking when would be most convenient for you and was unsure since you did not reply. I will be back in Columbia towards the end of this week and we could set up a time to meet in person if that is easier. Again, please let me know. The new school year is quickly approaching, so I would like to come to some sort of resolution regarding my complaint prior to then if possible so that it does not interfere with my studies.

Best,

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

From: DUNAVANT, ALLISON R
Sent: Friday, June 17, 2016 4:36:13 PM
To: Carl R. Wells
Subject: Re: Correspondence for Case

Mr. Wells,

I have received the letter correspondence attached in the last email; my apologies for not being able to call you today, I have just returned home from work. Would you be available for a phone call tomorrow? I realize tomorrow is Saturday, so if Monday works better I can call you then. Please let me know what is most convenient for you.

Best,

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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Office of Equal Opportunity Programs

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"Art is not what you see but what you make others see." -Edgar Degas

From: Carl R. Wells <wellscr@mailbox.sc.edu>
Sent: Friday, June 17, 2016 8:18:21 AM
To: DUNAVANT, ALLISON R
Subject: Correspondence for Case

THIS IS AN OFFICIAL CORRESPONDENCE FROM THE OFFICE OF EQUAL OPPORTUNITY PROGRAMS AT THE UNIVERSITY OF SOUTH CAROLINA

A letter has been issued to you electronically by our office. Upon clicking the link below, you will be taken to a screen displaying your name and requesting an access code to ensure confidentiality. Confirm that your name appears on the screen, and then enter your student ID number as the access code. If you are receiving this notice in your capacity as a leader of a campus organization, you should contact our office immediately to request the appropriate access code for your organization.

Your letter will appear in PDF format and should be printed or saved for your records. It will remain accessible through this link for 30 days. If the letter fails to appear, you may need to use a different computer or install the free Adobe Acrobat Reader. If you continue to experience difficulty accessing your letter or wish to confirm the legitimacy of this message, please contact our office at 803-777-3854.



Pick up your letter

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Dunavant v. Voros

From: WELLS, CARL
To: "DUNAVANT, ALLISON R"
Subject: RE: Correspondence for Case
Date: Tuesday, June 21, 2016 9:43:00 AM

Are you available any day this week? Please let me know. My schedule can accommodate you most days and most times for the remainder of this week. I look forward to hearing from you.

From: DUNAVANT, ALLISON R [mailto:dunavanta@email.sc.edu]
Sent: Monday, June 20, 2016 7:35 PM
To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Subject: Re: Correspondence for Case

Mr. Wells,

I have not heard from you, in any capacity, regarding a good time to speak with you and discuss the next steps regarding the complaint I filed.....or to plan a time to meet in person. Either is fine with me. I sent you an email Friday, the 17th, asking when would be most convenient for you and was unsure since you did not reply. I will be back in Columbia towards the end of this week and we could set up a time to meet in person if that is easier. Again, please let me know. The new school year is quickly approaching, so I would like to come to some sort of resolution regarding my complaint prior to then if possible so that it does not interfere with my studies.

Best,

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

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Sent: Friday, June 17, 2016 4:36:13 PM
To: Carl R. Wells
Subject: Re: Correspondence for Case

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I have received the letter correspondence attached in the last email; my apologies for not being able to call you today, I have just returned home from work. Would you be available for a phone call tomorrow? I realize tomorrow is Saturday, so if Monday works better I can call you then. Please let me know what is most convenient for you.

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Dunavant v. Voros

Best,

Allison R. Dunavant

Graduate Student

School of Visual Arts and Design

University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

From: Carl R. Wells <wellsr@mailbox.sc.edu>

Sent: Friday, June 17, 2016 8:18:21 AM

To: DUNAVANT, ALLISON R

Subject: Correspondence for Case

THIS IS AN OFFICIAL CORRESPONDENCE FROM THE OFFICE OF EQUAL OPPORTUNITY PROGRAMS AT THE UNIVERSITY OF SOUTH CAROLINA

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From: WHITE, HENRY
To: WELLS, CARL
Subject: FW: Dunavant
Date: Wednesday, June 22, 2016 2:11:15 PM

Carl,

Allison Dunavant's attorney indicates below that Allison has been trying to reach you.

Henry

From: Preston Brittain [mailto:preston@brittainlawfirm.com]
Sent: Wednesday, June 22, 2016 10:38 AM
To: WHITE, HENRY
Subject: Re: Dunavant

Henry,

I enjoyed speaking with you too. After reviewing the grievance policy -- and in an abundance of caution -- we filed a grievance to compliment the equal protection filing.

Allison has been trying to reach a Mr. Wells to set up her interview, but has not gotten a response. Not trying to be difficult, or pushy, but just wanted to make someone aware that Allison is trying to take the next step in the process and is having some difficulty.

Preston

On Wed, Jun 15, 2016 at 9:59 AM, WHITE, HENRY <HJWHITE@mailbox.sc.edu> wrote:
 Preston,

I enjoyed talking to you this morning and look forward to working with you.

You can find the University's non-academic grievance policy at:
<http://www.sc.edu/policies/ppm/staf627.pdf>

Since the events alleged by your client occurred outside of a University course of study, I do not think the policy applies.

Please call me if you have any questions.

Henry J. White
 Associate General Counsel
 University of South Carolina
 Office of the General Counsel
 109 Osborne Administration Building
 Columbia, SC 29208
803-777-7854
803-777-9500 FAX
hjwhite@mailbox.sc.edu

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Office of Equal Opportunity Programs

Dunavant v. Voros

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A. Preston Brittain
The Brittain Law Firm, PA
4614 Oleander Drive
Myrtle Beach SC 29577
843.449.8562
843.497.6124 (fax)

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Dunavant v. Voros

From: WELLS, CARL
To: WHITE, HENRY
Subject: RE: Dunavant
Date: Wednesday, June 22, 2016 3:50:00 PM

We have a meeting scheduled for Friday at 10:00 a.m.

From: WHITE, HENRY
Sent: Wednesday, June 22, 2016 2:11 PM
To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Subject: FW: Dunavant

Carl,

Allison Dunavant's attorney indicates below that Allison has been trying to reach you.

Henry

From: Preston Brittain [<mailto:preston@brittainlawfirm.com>]
Sent: Wednesday, June 22, 2016 10:38 AM
To: WHITE, HENRY
Subject: Re: Dunavant

Henry,

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Allison has been trying to reach a Mr. Wells to set up her interview, but has not gotten a response. Not trying to be difficult, or pushy, but just wanted to make someone aware that Allison is trying to take the next step in the process and is having some difficulty.

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Since the events alleged by your client occurred outside of a University course of study, I do not think the policy applies.

Please call me if you have any questions.

Henry J. White
 Associate General Counsel
 University of South Carolina

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Office of Equal Opportunity Programs

Dunavant v. Voros

Office of the General Counsel
109 Osborne Administration Building
Columbia, SC 29208
803-777-7854
803-777-9500 FAX
hjwhite@mailbox.sc.edu

--

A. Preston Brittain
The Brittain Law Firm, PA
4614 Oleander Drive
Myrtle Beach SC 29577
843.449.8562
843.497.6124 (fax)

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From: [Allison Dunavant](#)
To: [WELLS, CARL](#)
Subject: Allison Dunavant conversation recording
Date: Friday, June 24, 2016 6:03:21 PM
Attachments: [Voice 001.m4a](#)

Dr. Wells,

Please find attached the recorded conversation, between David Voros and I, we listened to during our meeting today. This conversation is from the afternoon (Italian time) on Monday, May 16th, 2016.

Important things to note in the conversation are as follows:

- Professor Voros beginning the conversation giving me options, and ending the conversation by deciding himself what I would do. This included him wanting me to stay in my room for the duration of the trip, and not providing me with meals. And not providing any transportation. There was no access to regular meals aside from those David Voros provided to us, so this was very concerning. He would not let me work in order to earn my meals (which I'd suggested in prior conversation) because he said my understanding and attitude were not to his liking.

-Voros stating that he should have made some kind of written agreement as to the nature of the trip prior. He is admitting that there was not prior agreement or written expectations and that it's "possible [I] may have had a different understanding" than the other students.

-David Voros also points out that he has helped me write grants and submitted me for fellowships, implying that I owed him some type of different behavior/more work.

-He states that he had Alex speak with me because he thought it would make me more comfortable; he was aware of the extent of my discomfort and fear of him.

-towards the end of the conversation he says that I should tell my mother I am safe. At this point he had already spoken with the university and was aware of the offer to have me removed. He did not make me aware of this. This is the most deeply troubling part of what was said in the recording. I cannot even begin to describe the panic and desperation I felt when I learned of this. And the fear that I might be stuck another week in my bedroom there without meals.

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

From: WELLS, CARL
To: Allison Dunavant
Subject: RE: Allison Dunavant conversation recording
Date: Friday, June 24, 2016 8:38:16 PM

Thank you! We will be in touch.

From: Allison Dunavant [dunavanta@email.sc.edu]
Sent: Friday, June 24, 2016 6:01 PM
To: WELLS, CARL
Subject: Allison Dunavant conversation recording

Dr. Wells,

Please find attached the recorded conversation, between David Voros and I, we listened to during our meeting today. This conversation is from the afternoon (Italian time) on Monday, May 16th, 2016.

Important things to note in the conversation are as follows:

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- Voros stating that he should have made some kind of written agreement as to the nature of the trip prior. He is admitting that there was not prior agreement or written expectations and that it's "possible [I] may have had a different understanding" than the other students.
- David Voros also points out that he has helped me write grants and submitted me for fellowships, implying that I owed him some type of different behavior/more work.
- He states that he had Alex speak with me because he thought it would make me more comfortable; he was aware of the extent of my discomfort and fear of him.
- towards the end of the conversation he says that I should tell my mother I am safe. At this point he had already spoken with the university and was aware of the offer to have me removed. He did not make me aware of this. This is the most deeply troubling part of what was said in the recording. I cannot even begin to describe the panic and desperation I felt when I learned of this. And the fear that I might be stuck another week in my bedroom there without meals.

Allison R. Dunavant
Graduate Student
School of Visual Arts and Design

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University of South Carolina

USC - 0203

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Dunavant v. Voros

From: CHAMETZKY, PETER
To: WELLS, CARL
Subject: Re: Correspondence for Case (Allison Dunavant)
Date: Friday, July 22, 2016 5:16:46 PM

Got it.

On 7/22/16 3:55 PM, "Carl R. Wells" <wellscr@mailbox.sc.edu> wrote:

>You have been carbon copied on a letter for case 2015021301 (Allison
>Dunavant).
>Please review the attachment and retain a copy for your files.
>
>If you do not have a PDF viewer installed, Adobe Reader can be downloaded
>at no cost from <https://get.adobe.com/reader/>. If you encounter
>difficulty opening this file, please contact our office.
>
>

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Office of Equal Opportunity Programs

CONFIDENTIAL

Dunavant v. Voros

From: [Allison Dunavant](#)
To: [WELLS, CARL; Mom; preston@brittainlawfirm.com](#)
Subject: Fwd: Books
Date: Friday, July 29, 2016 7:21:13 PM

Mr. Wells,

Has David now responded to the complaint I filed? I received this email, which I've forwarded to you, from the department claiming that I had borrowed books from the SVAD painting department; which is essentially referring to David Voros. The email says "at faculty request." He and his wife are the painting department. I responded; I have a book, singular, that came from inside the school building, not books plural. A book David allowed me to borrow from his office. But I will return that one book promptly. So I am wondering, if he has had the time to contact SVAD and request books, if he has also had the time to respond to the complaint. Please let me know. I view this request for a book, as a petty and arbitrary concern...and perhaps even as a way for David Voros to cause trouble for me within the department.

Thank you and best,

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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

From: "GRACIANO, ANDREW" <GRACIANO@mailbox.sc.edu>
 Date: 7/29/16 4:33 PM (GMT-05:00)
 To: dunavana@email.sc.edu
 Subject: Books

Dear Allison,

I am told that you have borrowed some books belonging to SVAD's painting program. Please return them to the SVAD office at your earliest convenience per faculty request.

Thank you!
 Andrew

Andrew Graciano, PhD
 Associate Director &
 Director of Graduate Studies
 School of Visual Art & Design
 University of South Carolina

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Office of Equal Opportunity Programs

CONFIDENTIAL

Dunavant v. Voros

From: [WELLS, CARL](#)
To: [Allison Dunavant; Mom](#); preston@brittainlawfirm.com
Subject: RE: Books
Date: Friday, July 29, 2016 8:14:24 PM

Can we meet next week. Let me know when you are available.

Sent from my Verizon Wireless 4G LTE smartphone

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

From: Allison Dunavant <dunavana@email.sc.edu>
 Date: 29/07/2016 7:21 PM (GMT-05:00)
 To: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>, Mom <edunavant@sc.rr.com>, preston@brittainlawfirm.com
 Subject: Fwd: Books

Mr. Wells,

Has David now responded to the complaint I filed? I received this email, which I've forwarded to you, from the department claiming that I had borrowed books from the SVAD painting department; which is essentially referring to David Voros. The email says "at faculty request." He and his wife are the painting department. I responded; I have a book, singular, that came from inside the school building, not books plural. A book David allowed me to borrow from his office. But I will return that one book promptly. So I am wondering, if he has had the time to contact SVAD and request books, if he has also had the time to respond to the complaint. Please let me know. I view this request for a book, as a petty and arbitrary concern...and perhaps even as a way for David Voros to cause trouble for me within the department.

Thank you and best,

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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

From: "GRACIANO, ANDREW" <GRACIANO@mailbox.sc.edu>
 Date: 7/29/16 4:33 PM (GMT-05:00)
 To: dunavana@email.sc.edu
 Subject: Books

Dear Allison,

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Thank you!
 Andrew

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Office of Equal Opportunity Programs

Dunavant v. Voros

Andrew Graciano, PhD
Associate Director &
Director of Graduate Studies
School of Visual Art & Design
University of South Carolina

USC - 0207

From: Alison Dunavant
To: WELLS, CARL
Subject: RE: Books
Date: Friday, July 29, 2016 8:22:45 PM

Yes, I would be more than happy to meet with you. I am available all of next week. Is there perhaps a morning time that works for you? My schedule is pretty open until the start of school.

Thanks,

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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

From: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>
 Date: 7/29/16 8:14 PM (GMT-05:00)
 To: Allison Dunavant <dunavana@email.sc.edu>, Mom <edunavant@sc.rr.com>, preston@brittainlawfirm.com
 Subject: RE: Books

Can we meet next week. Let me know when you are available.

Sent from my Verizon Wireless 4G LTE smartphone

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

From: Allison Dunavant <dunavana@email.sc.edu>
 Date: 29/07/2016 7:21 PM (GMT-05:00)
 To: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>, Mom <edunavant@sc.rr.com>, preston@brittainlawfirm.com
 Subject: Fwd: Books

Mr. Wells,

Has David now responded to the complaint I filed? I received this email, which I've forwarded to you, from the department claiming that I had borrowed books from the SVAD painting department; which is essentially referring to David Voros. The email says "at faculty request." He and his wife are the painting department. I responded; I have a book, singular, that came from inside the school building, not books plural. A book David allowed me to borrow from his office. But I will return that one book promptly. So I am wondering, if he has had the time to contact SVAD and request books, if he has also had the time to respond to the complaint. Please let me know. I view this request for a book, as a petty and arbitrary concern...and perhaps even as a way for David Voros to cause trouble for me within the department.

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Office of Equal Opportunity Programs

Dunavant v. Voros

Thank you and best,

Allison R. Dunavant
Graduate Student
School of Visual Arts and Design
University of South Carolina

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

From: "GRACIANO, ANDREW" <GRACIANO@mailbox.sc.edu>
Date: 7/29/16 4:33 PM (GMT-05:00)
To: dunavana@email.sc.edu
Subject: Books

Dear Allison,

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Thank you!
Andrew

Andrew Graciano, PhD
Associate Director &
Director of Graduate Studies
School of Visual Art & Design
University of South Carolina

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

From: WELLS, CARL
To: ["Allison Dunavant"](mailto:Allison.Dunavant@sc.edu)
Subject: RE: Books
Date: Tuesday, August 02, 2016 11:23:00 AM

What is your availability for Wednesday or Thursday of this week.

Let me know.

From: Allison Dunavant [mailto:dunavana@email.sc.edu]
Sent: Friday, July 29, 2016 8:23 PM
To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Subject: RE: Books

Yes, I would be more than happy to meet with you. I am available all of next week. Is there perhaps a morning time that works for you? My schedule is pretty open until the start of school.

Thanks,

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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

From: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>
 Date: 7/29/16 8:14 PM (GMT-05:00)
 To: Allison Dunavant <dunavana@email.sc.edu>, Mom <edunavant@sc.rr.com>, preston@brittainlawfirm.com
 Subject: RE: Books

Can we meet next week. Let me know when you are available.

Sent from my Verizon Wireless 4G LTE smartphone

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

From: Allison Dunavant <dunavana@email.sc.edu>
 Date: 29/07/2016 7:21 PM (GMT-05:00)
 To: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>, Mom <edunavant@sc.rr.com>, preston@brittainlawfirm.com
 Subject: Fwd: Books

Mr. Wells,

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Office of Equal Opportunity Programs

Dunavant v. Voros

Has David now responded to the complaint I filed? I received this email, which I've forwarded to you, from the department claiming that I had borrowed books from the SVAD painting department; which is essentially referring to David Voros. The email says "at faculty request." He and his wife are the painting department. I responded; I have a book, singular, that came from inside the school building, not books plural. A book David allowed me to borrow from his office. But I will return that one book promptly. So I am wondering, if he has had the time to contact SVAD and request books, if he has also had the time to respond to the complaint. Please let me know. I view this request for a book, as a petty and arbitrary concern...and perhaps even as a way for David Voros to cause trouble for me within the department.

Thank you and best,

Allison R. Dunavant
Graduate Student
School of Visual Arts and Design
University of South Carolina

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From: "GRACIANO, ANDREW" <GRACIANO@mailbox.sc.edu>
Date: 7/29/16 4:33 PM (GMT-05:00)
To: dunavana@email.sc.edu
Subject: Books

Dear Allison,

I am told that you have borrowed some books belonging to SVAD's painting program. Please return them to the SVAD office at your earliest convenience per faculty request.

Thank you!
Andrew

Andrew Graciano, PhD
Associate Director &
Director of Graduate Studies
School of Visual Art & Design
University of South Carolina

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

From: [Allison Dunavant](#)
To: [WELLS, CARL](#)
Subject: RE: Books
Date: Tuesday, August 02, 2016 12:00:49 PM

I am free either day; honestly whatever time best suits you. I generally prefer mornings though. Thank you-

Best,

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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

From: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>
 Date: 8/2/16 11:23 AM (GMT-05:00)
 To: Allison Dunavant <dunavana@email.sc.edu>
 Subject: RE: Books

What is your availability for Wednesday or Thursday of this week.

Let me know.

From: Allison Dunavant [mailto:dunavana@email.sc.edu]
Sent: Friday, July 29, 2016 8:23 PM
To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Subject: RE: Books

Yes, I would be more than happy to meet with you. I am available all of next week. Is there perhaps a morning time that works for you? My schedule is pretty open until the start of school.

Thanks,

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Office of Equal Opportunity Programs

Dunavant v. Voros

CONFIDENTIAL

Allison R. Dunavant

Graduate Student

School of Visual Arts and Design

University of South Carolina

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

From: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>

Date: 7/29/16 8:14 PM (GMT-05:00)

To: Allison Dunavant <dunavana@email.sc.edu>, Mom <edunavant@sc.rr.com>, preston@brittainlawfirm.com

Subject: RE: Books

Can we meet next week. Let me know when you are available.

Sent from my Verizon Wireless 4G LTE smartphone

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

From: Allison Dunavant <dunavana@email.sc.edu>

Date: 29/07/2016 7:21 PM (GMT-05:00)

To: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>, Mom <edunavant@sc.rr.com>, preston@brittainlawfirm.com

Subject: Fwd: Books

Mr. Wells,

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Office of Equal Opportunity Programs

Dunavant v. Voros

from inside the school building, not books plural. A book David allowed me to borrow from his office. But I will return that one book promptly. So I am wondering, if he has had the time to contact SVAD and request books, if he has also had the time to respond to the complaint. Please let me know. I view this request for a book, as a petty and arbitrary concern...and perhaps even as a way for David Voros to cause trouble for me within the department.

Thank you and best,

Allison R. Dunavant

Graduate Student

School of Visual Arts and Design

University of South Carolina

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

From: "GRACIANO, ANDREW" <GRACIANO@mailbox.sc.edu>

Date: 7/29/16 4:33 PM (GMT-05:00)

To: dunavana@email.sc.edu

Subject: Books

Dear Allison,

I am told that you have borrowed some books belonging to SVAD's painting program. Please return them to the SVAD office at your earliest convenience per faculty request.

Thank you!
Andrew

Andrew Graciano, PhD
Associate Director &
Director of Graduate Studies
School of Visual Art & Design
University of South Carolina

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

From: WELLS, CARL
To: "Allison Dunavant"
Subject: RE: Books
Date: Tuesday, August 02, 2016 2:44:00 PM

Okay!

Let's meet on Wednesday morning at 10:00 – 1600 Hampton Street, Suite 805.

Thanks!

Carl R. Wells, PhD

Assistant Director, Office of Equal Opportunity Programs
 Deputy Title IX Coordinator

Office of Equal Opportunity Programs
 1600 Hampton Street, Suite 805
 Columbia, SC 29208
 (W) (803) 777-9560
 (Fax) (803) 777-2296
www.sc.edu/eop



UNIVERSITY OF
SOUTH CAROLINA

From: Allison Dunavant [mailto:dunavanta@email.sc.edu]
Sent: Tuesday, August 02, 2016 12:01 PM
To: WELLS, CARL <WELLSCHR@mailbox.sc.edu>
Subject: RE: Books

I am free either day; honestly whatever time best suits you. I generally prefer mornings though.
 Thank you-

Best,

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Office of Equal Opportunity Programs

CONFIDENTIAL

Dunavant v. Voros

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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

From: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>
 Date: 8/2/16 11:23 AM (GMT-05:00)
 To: Allison Dunavant <dunavana@email.sc.edu>
 Subject: RE: Books

What is your availability for Wednesday or Thursday of this week.

Let me know.

From: Allison Dunavant [<mailto:dunavana@email.sc.edu>]
Sent: Friday, July 29, 2016 8:23 PM
To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Subject: RE: Books

Yes, I would be more than happy to meet with you. I am available all of next week. Is there perhaps a morning time that works for you? My schedule is pretty open until the start of school.

Thanks,

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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 Date: 7/29/16 8:14 PM (GMT-05:00)
 To: Allison Dunavant <dunavana@email.sc.edu>, Mom <edunavant@sc.rr.com>, preston@brittainlawfirm.com
 Subject: RE: Books

Can we meet next week. Let me know when you are available.

Sent from my Verizon Wireless 4G LTE smartphone

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

From: Allison Dunavant <dunavana@email.sc.edu>

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Office of Equal Opportunity Programs

Dunavant v. Voros

Date: 29/07/2016 7:21 PM (GMT-05:00)

To: "WELLS, CARL" <WELLSCHR@mailbox.sc.edu>, Mom <edunavant@sc.rr.com>, preston@brittainlawfirm.com

Subject: Fwd: Books

Mr. Wells,

Has David now responded to the complaint I filed? I received this email, which I've forwarded to you, from the department claiming that I had borrowed books from the SVAD painting department; which is essentially referring to David Voros. The email says "at faculty request." He and his wife are the painting department. I responded; I have a book, singular, that came from inside the school building, not books plural. A book David allowed me to borrow from his office. But I will return that one book promptly. So I am wondering, if he has had the time to contact SVAD and request books, if he has also had the time to respond to the complaint. Please let me know. I view this request for a book, as a petty and arbitrary concern...and perhaps even as a way for David Voros to cause trouble for me within the department.

Thank you and best,

Allison R. Dunavant

Graduate Student

School of Visual Arts and Design

University of South Carolina

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

From: "GRACIANO, ANDREW" <GRACIANO@mailbox.sc.edu>

Date: 7/29/16 4:33 PM (GMT-05:00)

To: dunavana@email.sc.edu

Subject: Books

Dear Allison,

I am told that you have borrowed some books belonging to SVAD's painting program. Please return them to the SVAD office at your earliest convenience per faculty request.

Thank you!

Andrew

Andrew Graciano, PhD
 Associate Director &
 Director of Graduate Studies
 School of Visual Art & Design
 University of South Carolina

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

From: WELLS, CARL
To: GABEL, JOAN; CHAMETZKY, PETER; GRACIANO, ANDREW; MILLER, ALLEN; ANDERSON, MELISSA
Cc: "Allison Dunavant"; VOROS, DAVID
Subject: Meeting Request
Date: Wednesday, August 03, 2016 10:30:00 AM

Provost Gabel

I would like to schedule a meeting ASAP to discuss the resolution of the Dunavant v. Voros complaint. I am requesting the following individual's attendance:

- 1) Henry White
- 2) Provost Gabel
- 3) Allen Miller
- 4) Andrew Graciano
- 5) Peter Chametzky

The Respondent has requested a resolution of the matter; however, Resolution/Mediation is contingent upon both parties agreeing to the terms. I have met with the Complainant and would like to apprise you of her concerns and to explore possibilities for resolution.

From: GABEL, JOAN
To: WELLS, CARL; CHAMETZKY, PETER; GRACIANO, ANDREW; MILLER, ALLEN; ANDERSON, MELISSA
Cc: Allison Dunavant; VOROS, DAVID
Subject: RE: Meeting Request
Date: Wednesday, August 03, 2016 10:33:50 AM

Melissa will be in touch shortly to make arrangements –

Thank you very much,
 Joan

Joan T.A. Gabel
 Executive Vice President for Academic Affairs and Provost

University of South Carolina
 Osborne Administration Building, Suite 102
 Columbia, SC 29208
gabelj@mailbox.sc.edu | 803.777.2808 | www.sc.edu

From: WELLS, CARL
Sent: Wednesday, August 03, 2016 10:30 AM
To: GABEL, JOAN <GABELJ@mailbox.sc.edu>; CHAMETZKY, PETER <CHAMETZK@mailbox.sc.edu>; GRACIANO, ANDREW <GRACIANO@mailbox.sc.edu>; MILLER, ALLEN <MILLERPA@mailbox.sc.edu>; ANDERSON, MELISSA <MANDERSO@mailbox.sc.edu>
Cc: Allison Dunavant <dunavana@email.sc.edu>; VOROS, DAVID <VOROS@mailbox.sc.edu>
Subject: Meeting Request

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- 1) Henry White
- 2) Provost Gabel
- 3) Allen Miller
- 4) Andrew Graciano
- 5) Peter Chametzky

The Respondent has requested a resolution of the matter; however, Resolution/Mediation is contingent upon both parties agreeing to the terms. I have met with the Complainant and would like to apprise you of her concerns and to explore possibilities for resolution.

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

From: ANDERSON, MELISSA
To: WELLS, CARL
Subject: RE: Meeting Request
Date: Wednesday, August 03, 2016 12:48:37 PM

Dear Dr. Wells,

I am working with everyone to schedule the meeting regarding the Dunavant v. Voros complaint. We are looking at tomorrow in order to have the meeting prior to the Provost's travel. Provost Gabel, Dr. Miller and Mr. White are all available tomorrow at 10:00 or 3:30. Would either of those times work for you?

Kindest Regards,

Melissa S. Anderson

Executive Assistant

Joan T.A. Gabel, Executive Vice President for Academic Affairs and Provost

University of South Carolina

Office of the Provost

Osborne Administration Building, Suite 102

915 Bull Street | Columbia, SC 29208

Main Line: (803)777-2808 | Direct Line: (803)777-0221

E-mail: manderso@mailbox.sc.edu



UNIVERSITY OF
SOUTH CAROLINA
 Office of the Provost

From: WELLS, CARL

Sent: Wednesday, August 03, 2016 10:30 AM

To: GABEL, JOAN <GABELJ@mailbox.sc.edu>; CHAMETZKY, PETER <CHAMETZK@mailbox.sc.edu>; GRACIANO, ANDREW <GRACIANO@mailbox.sc.edu>; MILLER, ALLEN <MILLERPA@mailbox.sc.edu>; ANDERSON, MELISSA <MANDERSO@mailbox.sc.edu>

Cc: Allison Dunavant <dunavana@email.sc.edu>; VOROS, DAVID <VOROS@mailbox.sc.edu>

Subject: Meeting Request

CONFIDENTIAL

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Office of Equal Opportunity Programs

Dunavant v. Voros

Provost Gabel

I would like to schedule a meeting ASAP to discuss the resolution of the Dunavant v. Voros complaint. I am requesting the following individual's attendance:

- 1) Henry White
- 2) Provost Gabel
- 3) Allen Miller
- 4) Andrew Graciano
- 5) Peter Chametzky

The Respondent has requested a resolution of the matter; however, Resolution/Mediation is contingent upon both parties agreeing to the terms. I have met with the Complainant and would like to apprise you of her concerns and to explore possibilities for resolution.

USC - 0221

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

From: WELLS, CARL
To: ANDERSON, MELISSA
Subject: RE: Meeting Request
Date: Wednesday, August 03, 2016 2:15:00 PM

I am also available to both of those times.

THANKS!

From: ANDERSON, MELISSA
Sent: Wednesday, August 03, 2016 12:49 PM
To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Subject: RE: Meeting Request

Dear Dr. Wells,

I am working with everyone to schedule the meeting regarding the Dunavant v. Voros complaint. We are looking at tomorrow in order to have the meeting prior to the Provost's travel. Provost Gabel, Dr. Miller and Mr. White are all available tomorrow at 10:00 or 3:30. Would either of those times work for you?

Kindest Regards,

Melissa S. Anderson
 Executive Assistant
 Joan T.A. Gabel, Executive Vice President for Academic Affairs and Provost

University of South Carolina
 Office of the Provost
 Osborne Administration Building, Suite 102
 915 Bull Street | Columbia, SC 29208
 Main Line: (803)777-2808 | Direct Line: (803)777-0221
 E-mail: manderso@mailbox.sc.edu



UNIVERSITY OF
SOUTH CAROLINA
 Office of the Provost

CONFIDENTIAL

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Office of Equal Opportunity Programs

Dunavant v. Voros

From: WELLS, CARL**Sent:** Wednesday, August 03, 2016 10:30 AM**To:** GABEL, JOAN <GABELJ@mailbox.sc.edu>; CHAMETZKY, PETER <CHAMETZK@mailbox.sc.edu>; GRACIANO, ANDREW <GRACIANO@mailbox.sc.edu>; MILLER, ALLEN <MILLERPA@mailbox.sc.edu>; ANDERSON, MELISSA <MANDERSO@mailbox.sc.edu>**Cc:** Allison Dunavant <dunavana@email.sc.edu>; VOROS, DAVID <VOROS@mailbox.sc.edu>**Subject:** Meeting Request

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I would like to schedule a meeting ASAP to discuss the resolution of the Dunavant v. Voros complaint. I am requesting the following individual's attendance:

- 1) Henry White
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- 3) Allen Miller
- 4) Andrew Graciano
- 5) Peter Chametzky

The Respondent has requested a resolution of the matter; however, Resolution/Mediation is contingent upon both parties agreeing to the terms. I have met with the Complainant and would like to apprise you of her concerns and to explore possibilities for resolution.

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

From: Allison Dunavant
To: WELLS, CARL
Subject: Dunavant v. Voros complaint
Date: Tuesday, August 09, 2016 9:27:30 AM

Mr. Wells,

I am emailing to check on the status of my complaint and the progress of the investigation. I haven't heard anything further regarding my class schedule or accommodations....the only accommodations I have received are the ones that I have made for myself.

Best,

Allison R. Dunavant
Graduate Student
School of Visual Arts and Design
University of South Carolina

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

From: WELLS, CARL
To: ["Allison Dunavant"](#)
Subject: RE: Dunavant v. Voros complaint
Date: Tuesday, August 09, 2016 1:21:00 PM

Mrs. Dunavant

I met with your academic department late last week. It appears that there is no one available to teach the painting course, which are taught by Dr. Voros. That being said, the only option is to take the courses that you discuss with Dr. Graciano. These course will still allow you to earn the degree.

In regard to the grade, you would have to go through the grade appeal process. Dr. Graciano can also help you with that.

Thanks!

From: Allison Dunavant [mailto:dunavanta@email.sc.edu]
Sent: Tuesday, August 09, 2016 9:27 AM
To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Subject: Dunavant v. Voros complaint

Mr. Wells,

I am emailing to check on the status of my complaint and the progress of the investigation. I haven't heard anything further regarding my class schedule or accommodations....the only accommodations I have received are the ones that I have made for myself.

Best,

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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Office of Equal Opportunity Programs

CONFIDENTIAL

Dunavant v. Voros

From: DUNAVANT, ALLISON R
To: WELLS, CARL
Subject: Re: Dunavant v. Voros complaint
Date: Tuesday, August 09, 2016 9:14:26 PM

Mr. Wells,

As an addendum to my last email I would like it to be known that I do not agree with any of this as a resolution or as an outcome for my complaint. I expressed in my last meeting with you, that it would be impossible to have someone else teach the painting courses that I needed to take and that we would, therefore, need to find an alternate solution. David Voros and Pam Voros comprise the ENTIRE painting department. You did not listen and proceeded with the academic meeting. It is true that I can take other courses to complete my degree, but that is absolutely not the point. I expressed this also in my last meeting with you---I NEED to take advanced painting courses in order to have a concentration in painting....and thus to pursue a career as a painting professor if I so choose. I could not have been more clear about this. This is not a resolution, this is a dismissal of my complaint and a shift of responsibility onto me, to accommodate myself.

Allison R. Dunavant

Graduate Student
 School of Visual Arts and Design
 University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

From: DUNAVANT, ALLISON R
Sent: Tuesday, August 9, 2016 5:55:45 PM
To: WELLS, CARL
Subject: Re: Dunavant v. Voros complaint

Mr. Wells,

I would like to request the following:

1. A copy of David Voros' response to my complaint.
2. A copy of the reprimand sent to David for his refusal to respond to the Notice of Harassment on two separate accounts.
3. Clarification of Allen Miller's role in your meeting and his role in the complaint process.

Thank you,

CONFIDENTIAL

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Office of Equal Opportunity Programs

Dunavant v. Voros

Allison R. Dunavant

Graduate Student
 School of Visual Arts and Design
 University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

From: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Sent: Tuesday, August 9, 2016 12:21:02 PM
To: DUNAVANT, ALLISON R
Subject: RE: Dunavant v. Voros complaint

Mrs. Dunavant

I met with your academic department late last week. It appears that there is no one available to teach the painting course, which are taught by Dr. Voros. That being said, the only option is to take the courses that you discuss with Dr. Graciano. These course will still allow you to earn the degree.

In regard to the grade, you would have to go through the grade appeal process. Dr. Graciano can also help you with that.

Thanks!

From: Allison Dunavant [mailto:dunavanta@email.sc.edu]
Sent: Tuesday, August 09, 2016 9:27 AM
To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Subject: Dunavant v. Voros complaint

Mr. Wells,

I am emailing to check on the status of my complaint and the progress of the investigation. I haven't heard anything further regarding my class schedule or accommodations....the only accommodations I have received are the ones that I have made for myself.

Best,

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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Office of Equal Opportunity Programs

CONFIDENTIAL

Dunavant v. Voros

From: WELLS, CARL
To: "DUNAVANT, ALLISON R"
Subject: RE: Dunavant v. Voros complaint
Date: Wednesday, August 10, 2016 2:28:00 PM

Allison

Thus far, we have attempted to mediate and resolve this issue. If you are not pleased with the recommendations that have come about as a result of the mediation/resolution, we can move forward with a full fledged investigation.

Please let me know your preference at this time.

Carl R. Wells, PhD

Assistant Director, Office of Equal Opportunity Programs
 Deputy Title IX Coordinator

Office of Equal Opportunity Programs
 1600 Hampton Street, Suite 805
 Columbia, SC 29208
 (W) (803) 777-9560
 (Fax) (803) 777-2296
www.sc.edu/eop



UNIVERSITY OF
 SOUTH CAROLINA

From: DUNAVANT, ALLISON R [mailto:dunavana@email.sc.edu]
Sent: Tuesday, August 09, 2016 9:14 PM
To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Subject: Re: Dunavant v. Voros complaint

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Allison R. Dunavant

Graduate Student
 School of Visual Arts and Design
 University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

From: DUNAVANT, ALLISON R
Sent: Tuesday, August 9, 2016 5:55:45 PM
To: WELLS, CARL
Subject: Re: Dunavant v. Voros complaint

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I would like to request the following:

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2. A copy of the reprimand sent to David for his refusal to respond to the Notice of Harassment on two separate accounts.
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 School of Visual Arts and Design
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Office of Equal Opportunity Programs

Dunavant v. Voros

From: WELLS, CARL <WELLS@mailbox.sc.edu>**Sent:** Tuesday, August 9, 2016 12:21:02 PM**To:** DUNAVANT, ALLISON R**Subject:** RE: Dunavant v. Voros complaint

Mrs. Dunavant

I met with your academic department late last week. It appears that there is no one available to teach the painting course, which are taught by Dr. Voros. That being said, the only option is to take the courses that you discuss with Dr. Graciano. These course will still allow you to earn the degree.

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Thanks!

From: Allison Dunavant [<mailto:dunavanta@email.sc.edu>]**Sent:** Tuesday, August 09, 2016 9:27 AM**To:** WELLS, CARL <WELLS@mailbox.sc.edu>**Subject:** Dunavant v. Voros complaint

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Best,

Allison R. Dunavant

Graduate Student

School of Visual Arts and Design

University of South Carolina

From: DUNAVANT, ALLISON R
To: WELLS, CARL; edunavant@scrr.com
Subject: Re: Dunavant v. Voros complaint
Date: Wednesday, August 10, 2016 4:59:58 PM

Mr. Wells,

A full investigation is what should have already been completed prior to this point, in response to my Formal Complaint of Discrimination against David Voros. That is what we discussed and what I have record of, and therefore it is tardy in its completion. On June 17, 2016 I received official correspondence as a receipt of my complaint. On June 24, 2016 following the interview you had with me, a Notice of Discriminatory Harassment was served upon David Voros. In this official correspondence letter, it states that this matter was under investigation and also asked for witnesses and/or additional evidence. On July 21, 2017 another official correspondence letter from you stated the following:

"We have contacted David Voros to apprise him of our investigation; however, we have not heard from him at this point. We have made a second attempt to have him respond. Without a response our investigation may move forward without him.....I will schedule a meeting with your academic department to explore options to ensure that during the course of our investigation or the course of next semester your contact with David Voros will be limited or restricted."

Furthermore, according to **EOP 1.01 Complaint Processing Procedures** an Informal Complaint Resolution/Mediation, which is what you've claimed to have done, occurs prior to the filing of a Formal Complaint of Discrimination. I filed a Formal Complaint of Discrimination on June 9th, therefore making that course of action inappropriate. Nor is it in conjunction with the actions you have taken so far. According to EOP 1.01, the Process of Formal Investigation is as follows. The investigator of the formal complaint will interview separately the complainant, alleged offender, and witnesses identified by each party. You interviewed me and asked for witnesses. You expressed that you would call David Voros to complete a telephone interview because he is in Italy. (I have recorded documentation of this conversation.) The final step according to EOP 1.01 is for the EOP investigator to consult with the VP for Human Resources, the VP of Student Affairs, the Executive VP for Academic Affairs and Provost, and the Legal Department in order to gain appropriate recommendation of disciplinary action to be taken; if deemed appropriate. You conducted such a meeting, including Executive VP and Provost of Student affairs, Joan Gabel, VP and Provost of International Programs, Allen Miller, and Henry White of the University's legal department. These occurrences/actions are not those of an Informal Complaint Resolution, but instead the actions of a formal investigation process.

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Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design

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Office of Equal Opportunity Programs

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Dunavant v. Voros

University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

From: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Sent: Wednesday, August 10, 2016 1:28:26 PM
To: DUNAVANT, ALLISON R
Subject: RE: Dunavant v. Voros complaint

Allison

Thus far, we have attempted to mediate and resolve this issue. If you are not pleased with the recommendations that have come about as a result of the mediation/resolution, we can move forward with a full fledge investigation.

Please let me know your preference at this time.

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 Deputy Title IX Coordinator

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 (Fax) (803) 777-2296
www.sc.edu/eop



UNIVERSITY OF
 SOUTH CAROLINA

From: DUNAVANT, ALLISON R [mailto:dunavanta@email.sc.edu]

Sent: Tuesday, August 09, 2016 9:14 PM

USC - 0232

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Office of Equal Opportunity Programs

CONFIDENTIAL

Dunavant v. Voros

To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Subject: Re: Dunavant v. Voros complaint

Mr. Wells,

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 School of Visual Arts and Design
 University of South Carolina

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To: WELLS, CARL
Subject: Re: Dunavant v. Voros complaint

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Graduate Student

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Office of Equal Opportunity Programs

Dunavant v. Voros

School of Visual Arts and Design
University of South Carolina

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From: WELLS, CARL <WELLSCHR@mailbox.sc.edu>
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To: DUNAVANT, ALLISON R
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Graduate Student
School of Visual Arts and Design
University of South Carolina

From: WELLS, CARL
To: DUNAVANT, ALLISON R
Subject: RE: Dunavant v. Voros complaint
Date: Wednesday, August 10, 2016 6:58:56 PM

Thank you!

What is your desire at this time. The mediation/resolution did not end in a mutually agreeable option. Would you like for us to fully investigate at this point?

From: DUNAVANT, ALLISON R [dunavana@email.sc.edu]
Sent: Wednesday, August 10, 2016 4:59 PM
To: WELLS, CARL; edunavant@sc.rr.com
Subject: Re: Dunavant v. Voros complaint

Mr. Wells,

A full investigation is what should have already been completed prior to this point, in response to my Formal Complaint of Discrimination against David Voros. That is what we discussed and what I have record of, and therefore it is tardy in its completion. On June 17, 2016 I received official correspondence as a receipt of my complaint. On June 24, 2016 following the interview you had with me, a Notice of Discriminatory Harassment was served upon David Voros. In this official correspondence letter, it states that this matter was under investigation and also asked for witnesses and/or additional evidence. On July 21, 2017 another official correspondence letter from you stated the following:

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From: WELLS, CARL <WELLSCR@mailbox.sc.edu>
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UNIVERSITY OF
SOUTH CAROLINA

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To: WELLS, CARL
Subject: Re: Dunavant v. Voros complaint

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Office of Equal Opportunity Programs

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Dunavant v. Voros

Thank you,

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School of Visual Arts and Design
University of South Carolina

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From: WELLS, CARL <WELLS@mailbox.sc.edu>
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To: DUNAVANT, ALLISON R
Subject: RE: Dunavant v. Voros complaint

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Subject: Dunavant v. Voros complaint

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Graduate Student
School of Visual Arts and Design
University of South Carolina

94

Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

From: Allison_Dunavant
To: WELLS, CARL
Subject: RE: Dunavant v. Voros complaint
Date: Wednesday, August 10, 2016 7:41:50 PM

Mr. Wells,

I am really unsure how I could be any clearer. I find your response condescending and inappropriate. My "desire" is for you to do your job, abide by EOP polices and state law regarding a Title IX complaint, and complete the investigation you have already begun. I will not repeat or reiterate what I've already expressly stated.

Thank you,

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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

From: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>
 Date: 8/10/16 6:58 PM (GMT-05:00)
 To: "DUNAVANT, ALLISON R" <dunavana@email.sc.edu>
 Subject: RE: Dunavant v. Voros complaint

Thank you!

What is your desire at this time. The mediation/resolution did not end in a mutually agreeable option. Would you like for us to fully investigate at this point?

From: DUNAVANT, ALLISON R [dunavana@email.sc.edu]
Sent: Wednesday, August 10, 2016 4:59 PM
To: WELLS, CARL; edunavant@sc.rr.com
Subject: Re: Dunavant v. Voros complaint

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Dunavant v. Voros

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Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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Sent: Wednesday, August 10, 2016 1:28:26 PM
To: DUNAVANT, ALLISON R
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96

Office of Equal Opportunity Programs

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Dunavant v. Voros

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Assistant Director, Office of Equal Opportunity Programs
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UNIVERSITY OF
SOUTH CAROLINA

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Office of Equal Opportunity Programs

Dunavant v. Voros

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To: WELLS, CARL
Subject: Re: Dunavant v. Voros complaint

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Office of Equal Opportunity Programs

Dunavant v. Voros

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Subject: Dunavant v. Voros complaint

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Graduate Student
School of Visual Arts and Design
University of South Carolina

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

From: WELLS, CARL
To: Allison Dunavant
Subject: RE: Dunavant v. Voros complaint
Date: Wednesday, August 10, 2016 9:45:10 PM

Thank you!

We will then move forward with a full investigation, given the attempt to mediate/resolve the situation did not result in a mutually agreeable option.

I am out of the Office tomorrow conducting training at one of our regional campuses, but will be the investigative process on Friday.

From: Allison Dunavant [dunavana@email.sc.edu]
Sent: Wednesday, August 10, 2016 7:41 PM
To: WELLS, CARL
Subject: RE: Dunavant v. Voros complaint

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 Graduate Student
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 To: "DUNAVANT, ALLISON R" <dunavana@email.sc.edu>
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To: WELLS, CARL; edunavant@sc.rr.com
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100

Office of Equal Opportunity Programs

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Dunavant v. Voros

A full investigation is what should have already been completed prior to this point, in response to my Formal Complaint of Discrimination against David Voros. That is what we discussed and what I have record of, and therefore it is tardy in its completion. On June 17, 2016 I received official correspondence as a receipt of my complaint. On June 24, 2016 following the interview you had with me, a Notice of Discriminatory Harassment was served upon David Voros. In this official correspondence letter, it states that this matter was under investigation and also asked for witnesses and/or additional evidence. On July 21, 2017 another official correspondence letter from you stated the following:

*"We have contacted David Voros to apprise him of our **investigation**; however, we have not heard from him at this point. We have made a second attempt to have him respond. Without a response our investigation may move forward without him.....I will schedule a meeting with your academic department to explore options to ensure that during the course of our investigation or the course of next semester your contact with David Voros will be limited or restricted."*

Furthermore, according to **EOP 1.01 Complaint Processing Procedures** an Informal Complaint Resolution/Mediation, which is what you've claimed to have done, occurs prior to the filing of a Formal Complaint of Discrimination. I filed a Formal Complaint of Discrimination on June 9th, therefore making that course of action inappropriate. Nor is it in conjunction with the actions you have taken so far. According to EOP 1.01, the Process of Formal Investigation is as follows. The investigator of the formal complaint will interview separately the complainant, alleged offender, and witnesses identified by each party. You interviewed me and asked for witnesses. You expressed that you would call David Voros to complete a telephone interview because he is in Italy. (I have recorded documentation of this conversation.) The final step according to EOP 1.01 is for the EOP investigator to consult with the VP for Human Resources, the VP of Student Affairs, the Executive VP for Academic Affairs and Provost, and the Legal Department in order to gain appropriate recommendation of disciplinary action to be taken; if deemed appropriate. You conducted such a meeting, including Executive VP and Provost of Student affairs, Joan Gabel, VP and Provost of International Programs, Allen Miller, and Henry White of the University's legal department. These occurrences/actions are not those of an Informal Complaint Resolution, but instead the actions of a formal investigation process.

If we are following EOP policies, you have already taken steps in accordance with the formal investigation process and so I ask that you complete it. I have been nothing short of clear with my intentions or in my understanding of what is occurring. I view the management of this situation, thus far, as retaliatory in itself and also as a dismissal and gross mishandling of my complaint of discrimination.

Allison R. Dunavant

Graduate Student

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

School of Visual Arts and Design
University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

From: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Sent: Wednesday, August 10, 2016 1:28:26 PM
To: DUNAVANT, ALLISON R
Subject: RE: Dunavant v. Voros complaint

Allison

Thus far, we have attempted to mediate and resolve this issue. If you are not pleased with the recommendations that have come about as a result of the mediation/resolution, we can move forward with a full fledged investigation.

Please let me know your preference at this time.

Carl R. Wells, PhD

Assistant Director, Office of Equal Opportunity Programs
 Deputy Title IX Coordinator

Office of Equal Opportunity Programs
 1600 Hampton Street, Suite 805
 Columbia, SC 29208
 (W) (803) 777-9560
 (Fax) (803) 777-2296
www.sc.edu/eop



UNIVERSITY OF
 SOUTH CAROLINA

From: DUNAVANT, ALLISON R [mailto:dunavana@email.sc.edu]

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Office of Equal Opportunity Programs

CONFIDENTIAL

Dunavant v. Voros

Sent: Tuesday, August 09, 2016 9:14 PM
To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Subject: Re: Dunavant v. Voros complaint

Mr. Wells,

As an addendum to my last email I would like it to be known that I do not agree with any of this as a resolution or as an outcome for my complaint. I expressed in my last meeting with you, that it would be impossible to have someone else teach the painting courses that I needed to take and that we would, therefore, need to find an alternate solution. David Voros and Pam Voros comprise the ENTIRE painting department. You did not listen and proceeded with the academic meeting. It is true that I can take other courses to complete my degree, but that is absolutely not the point. I expressed this also in my last meeting with you----I NEED to take advanced painting courses in order to have a concentration in painting....and thus to pursue a career as a painting professor if I so choose. I could not have been more clear about this. This is not a resolution, this is a dismissal of my complaint and a shift of responsibility onto me, to accommodate myself.

Allison R. Dunavant

Graduate Student
 School of Visual Arts and Design
 University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

From: DUNAVANT, ALLISON R
Sent: Tuesday, August 9, 2016 5:55:45 PM
To: WELLS, CARL
Subject: Re: Dunavant v. Voros complaint

Mr. Wells,

I would like to request the following:

1. A copy of David Voros' response to my complaint.
2. A copy of the reprimand sent to David for his refusal to respond to the Notice of Harassment on two separate accounts.
3. Clarification of Allen Miller's role in your meeting and his role in the complaint process.

Thank you,

Allison R. Dunavant

Graduate Student

CONFIDENTIAL

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Office of Equal Opportunity Programs

Dunavant v. Voros

School of Visual Arts and Design
University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

From: WELLS, CARL <WELLS@mailbox.sc.edu>
Sent: Tuesday, August 9, 2016 12:21:02 PM
To: DUNAVANT, ALLISON R
Subject: RE: Dunavant v. Voros complaint

Mrs. Dunavant

I met with your academic department late last week. It appears that there is no one available to teach the painting course, which are taught by Dr. Voros. That being said, the only option is to take the courses that you discuss with Dr. Graciano. These course will still allow you to earn the degree.

In regard to the grade, you would have to go through the grade appeal process. Dr. Graciano can also help you with that.

Thanks!

From: Allison Dunavant [<mailto:dunavanta@email.sc.edu>]
Sent: Tuesday, August 09, 2016 9:27 AM
To: WELLS, CARL <WELLS@mailbox.sc.edu>
Subject: Dunavant v. Voros complaint

Mr. Wells,

I am emailing to check on the status of my complaint and the progress of the investigation. I haven't heard anything further regarding my class schedule or accommodations....the only accommodations I have received are the ones that I have made for myself.

Best,

Allison R. Dunavant
Graduate Student
School of Visual Arts and Design
University of South Carolina

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Office of Equal Opportunity Programs

CONFIDENTIAL

Dunavant v. Voros

From: DUNAVANT, ALLISON R
To: WELLS, CARL
Subject: Re: Dunavant v. Voros complaint
Date: Tuesday, August 16, 2016 5:56:52 PM

Dr. Wells,

I emailed Dr. Chametzky and Graciano about my grade and they both said that the only way to resolve the unjust grade is to speak with David Voros.....and that the changing of this grade is at his discretion entirely. I cannot and will not speak with him, due to the investigation that should be occurring. This is unacceptable.

Thank you.

Allison R. Dunavant

Graduate Student
 School of Visual Arts and Design
 University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

From: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Sent: Wednesday, August 10, 2016 8:45:09 PM
To: DUNAVANT, ALLISON R
Subject: RE: Dunavant v. Voros complaint

Thank you!

We will then move forward with a full investigation, given the attempt to mediate/resolve the situation did not result in a mutually agreeable option.

I am out of the Office tomorrow conducting training at one of our regional campuses, but will be the investigative process on Friday.

From: Allison Dunavant [dunavanta@email.sc.edu]
Sent: Wednesday, August 10, 2016 7:41 PM
To: WELLS, CARL
Subject: RE: Dunavant v. Voros complaint

Mr. Wells,

I am really unsure how I could be any clearer. I find your response condescending and inappropriate. My "desire" is for you to do your job, abide by EOP polices and state law regarding a Title IX complaint, and complete the investigation you have already begun. I will not repeat or reiterate what I've already expressly stated.

Thank you,

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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

From: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>
 Date: 8/10/16 6:58 PM (GMT-05:00)
 To: "DUNAVANT, ALLISON R" <dunavana@email.sc.edu>
 Subject: RE: Dunavant v. Voros complaint

Thank you!

What is your desire at this time. The mediation/resolution did not end in a mutually agreeable option. Would you like for us to fully investigate at this point?

From: DUNAVANT, ALLISON R [dunavana@email.sc.edu]
Sent: Wednesday, August 10, 2016 4:59 PM
To: WELLS, CARL; edunavant@sc.rr.com
Subject: Re: Dunavant v. Voros complaint

Mr. Wells,

A full investigation is what should have already been completed prior to this point, in response to my Formal Complaint of Discrimination against David Voros. That is what we discussed and what I have record of, and therefore it is tardy in its completion. On June 17, 2016 I received official correspondence as a receipt of my complaint. On June 24, 2016 following the interview you had with me, a Notice of Discriminatory Harassment was served upon David Voros. In this official correspondence letter, it states that this matter was under investigation and also asked for witnesses and/or additional evidence. On July 21, 2017 another official correspondence letter from you stated the following:

*"We have contacted David Voros to apprise him of our **investigation**; however, we have not heard from him at this point. We have made a second attempt to have him respond. Without a response our investigation may move forward without him.....I will schedule a meeting with your academic department to explore options to ensure that during the course of our investigation or the course of next semester your contact with David Voros will be limited or restricted."*

Furthermore, according to **EOP 1.01 Complaint Processing Procedures** an Informal Complaint Resolution/Mediation, which is what you've claimed to have done, occurs prior to the filing of a Formal Complaint of Discrimination. I filed a Formal Complaint of Discrimination on June 9th, therefore making that course of action inappropriate. Nor is it in conjunction with the actions you have taken so far. According to EOP 1.01, the Process of Formal Investigation is as follows. The investigator of the formal complaint will interview separately the complainant,

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

alleged offender, and witnesses identified by each party. You interviewed me and asked for witnesses. You expressed that you would call David Voros to complete a telephone interview because he is in Italy. (I have recorded documentation of this conversation.) The final step according to EOP 1.01 is for the EOP investigator to consult with the VP for Human Resources, the VP of Student Affairs, the Executive VP for Academic Affairs and Provost, and the Legal Department in order to gain appropriate recommendation of disciplinary action to be taken; if deemed appropriate. You conducted such a meeting, including Executive VP and Provost of Student affairs, Joan Gabel, VP and Provost of International Programs, Allen Miller, and Henry White of the University's legal department. These occurrences/actions are not those of an Informal Complaint Resolution, but instead the actions of a formal investigation process.

If we are following EOP policies, you have already taken steps in accordance with the formal investigation process and so I ask that you complete it. I have been nothing short of clear with my intentions or in my understanding of what is occurring. I view the management of this situation, thus far, as retaliatory in itself and also as a dismissal and gross mishandling of my complaint of discrimination.

Allison R. Dunavant

Graduate Student
School of Visual Arts and Design
University of South Carolina

"Art is not what you see but what you make others see. "-Edgar Degas

From: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Sent: Wednesday, August 10, 2016 1:28:26 PM
To: DUNAVANT, ALLISON R
Subject: RE: Dunavant v. Voros complaint

Allison

Thus far, we have attempted to mediate and resolve this issue. If you are not pleased with the recommendations that have come about as a result of the mediation/resolution, we can move forward with a full fledge investigation.

Please let me know your preference at this time.

Carl R. Wells, PhD

Assistant Director, Office of Equal Opportunity Programs
Deputy Title IX Coordinator

Office of Equal Opportunity Programs
1600 Hampton Street, Suite 805
Columbia, SC 29208

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CONFIDENTIAL

Dunavant v. Voros

(W) (803) 777-9560
 (Fax) (803) 777-2296
www.sc.edu/eop



UNIVERSITY OF SOUTH CAROLINA

From: DUNAVANT, ALLISON R [mailto:dunavana@email.sc.edu]
Sent: Tuesday, August 09, 2016 9:14 PM
To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Subject: Re: Dunavant v. Voros complaint

Mr. Wells,

As an addendum to my last email I would like it to be known that I do not agree with any of this as a resolution or as an outcome for my complaint. I expressed in my last meeting with you, that it would be impossible to have someone else teach the painting courses that I needed to take and that we would, therefore, need to find an alternate solution. David Voros and Pam Voros comprise the ENTIRE painting department. You did not listen and proceeded with the academic meeting. It is true that I can take other courses to complete my degree, but that is absolutely not the point. I expressed this also in my last meeting with you----I NEED to take advanced painting courses in order to have a concentration in painting....and thus to pursue a career as a painting professor if I so choose. I could not have been more clear about this. This is not a resolution, this is a dismissal of my complaint and a shift of responsibility onto me, to accommodate myself.

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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Office of Equal Opportunity Programs

CONFIDENTIAL

Dunavant v. Voros

"Art is not what you see but what you make others see." -Edgar Degas

From: DUNAVANT, ALLISON R
Sent: Tuesday, August 9, 2016 5:55:45 PM
To: WELLS, CARL
Subject: Re: Dunavant v. Voros complaint

Mr. Wells,

I would like to request the following:

1. A copy of David Voros' response to my complaint.
2. A copy of the reprimand sent to David for his refusal to respond to the Notice of Harassment on two separate accounts.
3. Clarification of Allen Miller's role in your meeting and his role in the complaint process.

Thank you,

Allison R. Dunavant

Graduate Student
 School of Visual Arts and Design
 University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

From: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Sent: Tuesday, August 9, 2016 12:21:02 PM
To: DUNAVANT, ALLISON R
Subject: RE: Dunavant v. Voros complaint

Mrs. Dunavant

I met with your academic department late last week. It appears that there is no one available to teach the painting course, which are taught by Dr. Voros. That being said, the only option is to take the courses that you discuss with Dr. Graciano. These course will still allow you to earn the degree.

In regard to the grade, you would have to go through the grade appeal process. Dr. Graciano can also help you with that.

Thanks!

From: Allison Dunavant [<mailto:dunavanta@email.sc.edu>]
Sent: Tuesday, August 09, 2016 9:27 AM

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Office of Equal Opportunity Programs

Dunavant v. Voros

To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Subject: Dunavant v. Voros complaint

Mr. Wells,

I am emailing to check on the status of my complaint and the progress of the investigation. I haven't heard anything further regarding my class schedule or accommodations....the only accommodations I have received are the ones that I have made for myself.

Best,

Allison R. Dunavant
Graduate Student
School of Visual Arts and Design
University of South Carolina

USC - 0254

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Office of Equal Opportunity Programs

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Dunavant v. Voros

From: Allison Dunavant
To: WELLS, CARL; Mom; Preston Brittain
Subject: Classes, Dunavant v Voros
Date: Thursday, August 18, 2016 6:18:36 PM

Dr. Wells,

The art department was supposed to make accommodations for my life drawing course I'm registered for with David. I have inquired about this and not received any concrete answer as to what is the verdict on that; whether or not I am able to take this class with Jaime Meisenheimer and receive upper level credit. If this is not possible I will need help registering for an independent study with another professor. This is also unacceptable. These accommodations should have been taken care of by you and my department prior to classes beginning today. Also unacceptable. I should not be shuffling around accommodating myself after filing a Title IX complaint.

Allison R. Dunavant
Graduate Student
School of Visual Arts and Design
University of South Carolina

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Office of Equal Opportunity Programs

Dunavant v. Voros

CONFIDENTIAL

From: WELLS, CARL
To: "Allison Dunavant"; Mom; Preston Brittain
Subject: RE: Classes, Dunavant v Voros
Date: Friday, August 19, 2016 12:22:00 PM

Allison

I spoke with both Arts and Sciences and Visual Arts and the request for Jaime Meisenheimer to teach the course is being considered. Someone should be in touch one way or the other very shortly.

Let me know if I can help with anything else.

From: Allison Dunavant [mailto:dunavanta@email.sc.edu]
Sent: Thursday, August 18, 2016 6:18 PM
To: WELLS, CARL <WELLS@mailbox.sc.edu>; Mom <edunavant@sc.rr.com>; Preston Brittain <preston@brittainlawfirm.com>
Subject: Classes, Dunavant v Voros

Dr. Wells,

The art department was supposed to make accommodations for my life drawing course I'm registered for with David. I have inquired about this and not received any concrete answer as to what is the verdict on that; whether or not I am able to take this class with Jaime Meisenheimer and receive upper level credit. If this is not possible I will need help registering for an independent study with another professor. This is also unacceptable. These accommodations should have been taken care of by you and my department prior to classes beginning today. Also unacceptable. I should not be shuffling around accommodating myself after filing a Title IX complaint.

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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Office of Equal Opportunity Programs

CONFIDENTIAL

Dunavant v. Voros

From: GRACIANO, ANDREW
To: WELLS, CARL
Subject: FW: Life Drawing
Date: Friday, August 19, 2016 12:38:19 PM

FYI

From: GRACIANO, ANDREW
Sent: Friday, August 19, 2016 12:38 PM
To: DUNAVANT, ALLISON R (dunavana@email.sc.edu) <dunavana@email.sc.edu>;
'jmise@mailbox.sc.edu' <jmise@mailbox.sc.edu>
Subject: Life Drawing

Dear Allison and Jaime,

Weeks ago (July 26) I submitted the nomination of Jaime Misenheimer to the College of Arts and Sciences Dean's Office. Unfortunately, the timing was terrible as the College has recently undergone a change of administration—new Dean and new Associate Deans—and I guess this request was overlooked. But, today, I was able to speak with Dr. Doug Meade, the new Associate Dean as of last week, and he said he would expedite this for approval. The College will not list a graduate section, however, with only one student in it; so Allison will have to do this as an Independent Study with Jaime. On the Independent Study contract, you can specify that class attendance is required and that some sort of extra grad-level work will be completed in the semester.

Allison: You may get an Independent Study contract from the Art Office. Fill it out with Jaime and then bring it to me to sign. I'm here today until at least 3pm. I'll be here also on Monday from 8:30am to 4pm. Or you can scan the document and send it to me as a pdf email attachment, and I can sign it electronically.

Many thanks to Jaime for being willing to make this happen.

All best,
Andrew

Andrew Graciano, PhD
Associate Professor of Art History

Associate Director and Director of Graduate Studies
School of Visual Art & Design
University of South Carolina
Columbia, SC 29208 USA
+1(803) 777-4236
<https://www.routledge.com/Exhibiting-Outside-the-Academy-Salon-and-Biennial-1775-1999-Alternative/Graciano/p/book/9781472428271>

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Office of Equal Opportunity Programs

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Dunavant v. Voros

From: DUNAVANT, ALLISON R
To: EQUAL OPPORTUNITY, EOP
Cc: WELLS, CARL; edunavant@sc.rr.com; preston@brittainlawfirm.com
Subject: Title IX Complaint Dunavant v Voros
Date: Thursday, August 25, 2016 9:49:52 PM

USC EOP Office,

I am sending this email to address the Title IX complaint I filed on June 9th, 2016. The EOP office acknowledged their receipt of this complaint on June 17th, 2016. I was interviewed by the EOP office on June 24th and asked to provide witnesses as well as to supply any supplemental information that I had. David Voros, the respondent in this case, was served a Notice of Charge of Discriminatory Harassment to begin the investigation also on the 24th. The EOP office tried to contact David Voros on separate accounts to interview him, and was unsuccessful. A month later, on July 21st, 2016, I was sent a letter stating that David Voros had still not responded to the notification of the investigation. At some point later, I was told by Carl Wells that an investigation had not even begun, only mediation attempts, and at this point it is still unknown to me whether one has been completed. However, I am assuming, based upon the EOP's policies regarding Title IX...and the disregard of them where my case is concerned, that an investigation has not occurred fully or properly. It has been three months since I filed my Title IX complaint and have had no formal response. All academic course changes/accommodations that have occurred have been done on my own. This, in its entirety, is unacceptable, and I would like this letter to serve as record of my dissatisfaction with the handling and "resolution" of the complaint I filed.

Allison R. Dunavant

Graduate Student, MFA
Young Artist Workshop Coordinator
School of Visual Arts and Design
University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

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Office of Equal Opportunity Programs

CONFIDENTIAL

Dunavant v. Voros

From: VOROS, DAVID
To: WELLS, CARL
Cc: WHITE, HENRY; MILLER, ALLEN; info; Marco Laracca;
Subject: RE: From Carl R. Wells
Date: Friday, August 26, 2016 7:27:32 PM

Carl,

Since there appears to be a good deal of confusion about our articulation on this matter, on the advice of my council, I have prepared the statement below. The below is, in fact, essentially the same in content as the message sent to Allen Miller on May 18, 2016, on which you and your office were copied. In fact, you referred to this summary in your email to me of May 19. Below is an expanded version of that document - again, the majority of which has already been in your, and in the University's possession since May 18. Beyond the below, I do not feel that I can add any more to my response in describing events surrounding Ms. Dunnnavant's tenure in Monte Castello. Please take the below, along with my account sent in May, as my written response to your inquiry - it was my assumption that you had already done this when the document was sent on May 18, and you confirmed its receipt.

Regarding your ascertains that I was negligent in my response to your messages, I want to be clear: please note that as per Dr. Miller's message, I in fact responded to your August 10 email promptly on August 12 indicating I would get back to you after the upcoming week end. I then emailed you on Monday, August 15 requesting a phone appointment to discuss the matter on Tuesday, August 16. On August 16, having received no response from you, I wrote again on August 16 and again you failed to reply. Later on August 16, I indicated that you should be in direct contact with my attorney's since you were not responding to my messages. I copied Dr. Miller on all the above - he apparently received them.

Prior to this, you sent me an email on 6/24, in which you also indicated that I was negligent in responding to a letter attached to your previous message. Again this is inaccurate - as I pointed out and again, as Dr. Miller confirmed, since he was copied on the email. I am happy to re-send these messages if you like and you can review the dates.

Regarding a meeting in person, considering what I perceive to be rather exhaustive correspondence on this matter, I feel I have little to add to the discussion at this point. However, should it be necessary to meet in person, I would be willing to attend a meeting - accompanied of course by my attorney.

Prior to scheduling this however (again on advice of my counsel) I would like you to clarify the following at your earliest convenience:

1. exactly what additional information you require from me in the conversation that has not already been provided
2. what is being demanded by the complainant
3. what action you are threatening against me

Please respond to the above as soon as possible and I will get back to you immediately. I will also copy all the above in order to insure that nothing is lost in the mail.

DV

MY RESPONSE:

To Whom It May Concern,

As per the request of Carl Wells at the Office of Equal Opportunity Programs at the University of South Carolina, I am providing below the circumstances regarding the situation that occurred in Italy last May with Allison Dunavant, during her stay at the ICARTS, SRL facility: "Asilo" located in Monte Castello di Vibio, Umbria (PG), Italy.

After speaking with Allison prior to her departure and reflecting on circumstances surrounding these issues, my opinion and - as described later in this account, the perspective of others who witnessed our interactions - is that Allison's version of events, as well as her understanding of her verbal agreement with ICA does not accurately represent what transpired. Nonetheless, I feel that both I - and ICA as a whole - have acted rationally, responsibly, and appropriately in addressing the situation. Further, that we have acted in a way that is in keeping with company protocols developed in context of both U.S. and Italian labor law.

Repeatedly in her complaint to EOP, Allison makes the assertion that she was held in "dangerous" conditions, denied food, and treated unfairly. These allegations are not true. In fact, Allison resided at the ICARTS for more than a week without mention of ever feeling unsafe, and in fact, expressed satisfaction with the facility and the beauty of the village and its vista's.

Considering the condition of our facility, it should be noted that other visitors have not shared Allison's assessment. In fact, I have in my posession a letter from Mark Buyck, chair of the Board of Trustees at USC who was quite literally, the last person in the building before we closed in late August 2015. After his visit, Mark Buyck wrote a letter to me, on which he copied USC President, Harris Pastides, describing the facility as a tremendous asset to the university." Between Mark Buyck's visit and the time the facility opened for the USC group in May of 2016 (about a week after Allison's stay) the facility was closed and was locked up securely. The possibility that the facility should deteriorate to a "dangerous" level securely locked up and unused, seems implausible and in fact, was not the case. Further, to my knowledge, none of the participants in the USC in Italy group arriving about a week after Alison's departure felt the facility was dangerous or not well maintained. Allison description of the mattress she slept on as so saturated with cat urine that when she returned home she had to throw away her sheets seems to me a clear fabrication. In fact, at the close of the 2015 season, all bedding and towels were removed by our linen service and the sheets Allison used while she was here were ones that I lent her from my own house and they were left by her on the bed in a wad when she left the building. The mattresses she used were the same ones utilized by Allen Miller during his stay in Monte Castello and were subsequently used by USC students occupying the same room just a week after Allison departed. To my knowledge no one in that group complained about the level of saturation of cat urine in mattresses.

During her stay, Allison was provided with 3 quite generous meals per day, prepared by myself and our other assistance in residence in that period. During that time, Allison never mentioned a lack of food or dissatisfaction with what she was provided.

Regarding her treatment, during the time proceeding the incident returning from Rome, Allison never complained about her work-load or about being treated unfairly, although our

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Dunavant v. Voros

assistant, Alexandra Miller spoke to her a couple times regarding her pace and lack of participation in preparing group meals and subsequent clean up. Along these lines, while she indicates in her complaint that she did not anticipate the type of work she was ultimately expected to do in Monte Castello (or the duration of it), Allison did not complain about these issues to me. In her complaint to USC she describes anticipating light cleaning and other such duties and makes the assertion that ultimately the work load was much more demanding. Later in her narrative however, when she describes the specific activities she took part in, she ultimately describes activities that would clearly fall within the category of cleaning and painting and were the exact activities I described to her before she departed the US.

Allison makes the complaint that she was required to sleep in temperatures below 40 degrees F. This is not accurate. Allison's visit occurred in the second week of May, when temperatures in central Italy seldom fall below the 50's and 60's.

In terms of background to the situation, I should point out first that it has long been a tradition with the art school in Monte Castello to provide working scholarships for students as a means of helping talented students from less affluent families study in Italy. As I expressed to you numerous times, coming myself from a family of limited means and thus unable to study abroad, this is a particular mission of mine. However, this is also a common practice among artist residencies around the world and I invite you to search Artist Residences in Italy and you will soon find among the many options: working scholarships. At ICA, we will provide six of these opportunities for students from diverse institutions and for varying periods of time in the course of the summer. Despite our objective at ICA to provide opportunities to disadvantaged students however, common sense would dictate that as an employer and business-person, I must also be vigilant to the needs of our company and coordinate things in an effective manner. This includes notifying employees if their performance is sub-standard. I believe this is not only entirely reasonable, but expected.

Regarding the current situation with USC students: ICA offered working scholarships to 3 students from USC: two graduate students and one undergraduate student. All three sought to participate in the USC in Italy program, however all were unable to find sufficient financial support for their endeavor. One student's need was so great in fact, (in contrast to his initiative) that we also elected to purchase his transatlantic plane ticket.

This spring, one of the USC students, Allison Dunavant, came to me complaining that as a graduate student, there were no sources of aid available to her through USC Study Abroad. As you recall, I referred her to you. Your advice (according to my recollection) was for Allison to seek funding through the department or college. With this in mind, I advised her to apply for CAS funding and assisted her in applying for a CAS scholarship for grad students. Together with my colleague, Andrew Graciano (whose input I encourage you to seek), coordinator of our grad program in SVAD at USC, I recommended her for the funding. Andrew also recommended her for another grant, for which I provided a letter of support to the college.

Ultimately, because I felt that these three were serious and committed students I met with them together in mid-March off-campus and I told them of the opportunities for work-study scholarships provided by ICA. In this case, their activities would be in preparation for the USC group on May 23.

The situation our company offered them was that in exchange for working five hours per day, five days per week, ICA would provide accommodations, meals, and studio space for them. I

made it clear that during their off-time, they could travel at their own expense, but that sometimes they could also accompany me on errands to locations that could be of interest to them and to remain there (again returning at their own expense) on the week end, without reservation. At the time, we discussed the parameters of their duties and obligations at length., I will also point out that we had numerous meetings together after the groups arrival to confirm the implementation of this schedule in terms of daily events. I feel quite confident that after speaking with the rest of the group that they were clear on the parameters of the arrangement.

Upon the students arrival - and until Friday - all seemed to be going according to plan and all seemed satisfied. The group was assigned tasks around the building that included painting walls and cleaning as previously agreed. The work was not particularly strenuous and no one expressed complaints or indicated any heath issues that would hinder the performance of their duties. Overall, the group was clearly enjoying the experience and were also producing artwork, which we discussed as a group. In the course of my own activities, I took them to visit museums in Perugia and Assisi, where we spoke together about masterpieces in the collections. Throughout their stay they had been provided meals, which we prepared communally, which we will continue to do until our kitchen opens on Thursday.

In the course of their stay thus far, I have met with the group frequently and discussed the workload and conditions (as we continue to do) and to plan future activities - all seemed agreeable that it was a fair arrangement and in keeping with our verbal agreement and their expectations. Allison was of course engaged in this discussion and expressed no reservations about the type of work she was assigned or the workload, nor did she at any time advise me of any heath concerns that would impair her ability to work, or that could otherwise endanger others. Despite the fact that she voiced no objections to the work or workload to me directly, several students expressed to me that Allison told them that if I wanted certain work done (such as cleaning) I should do it myself. Following our Thursday meeting, two of the students came to me afterward expressing frustration that they felt Allison was not doing her share of work and placing additional burden on them to complete their tasks. Both expressed that were frustrated that Allison seemed to be spending of lot of time on the phone and that her work pace was erratic. I spoke to her about this and also advised my assistant, Alexandra to more closely monitor Allison's work progress and to assign appropriate tasks to what appeared to be in her abilities. Alexandra reported to me that while Allison was argumentative, she agreed to comply.

I became quite concerned about the situation developing in Monte Castello with her peers and spoke to Allison about her job performance in Monte Castello. In the course of our conversation, Allison agreed to apply herself, but was argumentative. Afterward, other students came to me in confidence and reported that she told them that she did not feel that she needed to acknowledge me as her supervisor and complained that she did not feel a need to do manual labor. This of course seemed strange to me, since I quite clearly explained the activities the group would engage in in exchange for their stay and no one felt his unreasonable.

On Friday Allison failed to show up to work, complaining of a headache. Allison then slept until lunch and then afterward spent the remainder of the day packing for the weekend trip to Rome while the other students worked. Allison appeared to be in good health and spirits at that time. The other students appeared quite agitated about the situation and complained. Consequently, I asked Alexandra to speak to Allison again when the group returned from their

trip on Saturday.

On Friday afternoon, since I had business in Rome, I agreed to take the students to a suburban Rome location from which they could take a bus into the city. My colleagues, Eros, our general manager and Alexandra our staff manager, and I dropped them off them at a central bus station where they could find transport to their hotel in Rome, where I had made a booking for them (Best Western Canada). Alex, Eros, and I walked with them to the bus stop to be sure they got on the correct bus. I provided them with a map and an itinerary for Rome and specific instructions on how to find their hotel as well as information regarding their return trip.

The group was instructed that upon arrival at the bus station at Rome Termini, they would enter the station and in passing through en route to their hotel, they would confirm their return schedule and email me the details. (In our departure conversation, we emphasized that they should check the return schedule because they would have to transfer trains on their return at the city of Terni, about 45 minutes drive from Monte Castello and the small train line to Monte Castello provided limited service in the late night hours.) I told them quite specifically about ICA's policies regarding off-campus travel and they were clear that if they cold not make their connection, they would remain in Terni overnight.

Nonetheless, they failed to check the schedule and did not look into the departure times of the connecting train until they reached Terni. As a result, the group was stranded at Terni on Saturday night. They informed me by phone that they had missed the train at approximately 8:00 PM. As per our discussion, I told them that they had two options:

1. Stay at a hotel in Terni and continue on the next day
2. Our driver could pick them up at Terni for €20 per person. (The payment is made directly to our driver, Carlo Innocenti and is a very reasonable rate.)

They decided to stay in Terni and continue on the next day. Later that night however, I received two emails from Allison that I found most inappropriate in tone and disrespectful. I have forwarded these messages to you. In summary, she indicated her frustration that I was not willing to pick them up in Terni after 9:00 PM (a 45minute drive each way, door to door. I calculate an additional 15 minutes on each end for loading and traffic and thus this represents a two – hour drive.) Allison appeared incensed that I refused to do so. In fact, she sent me a message that I felt to be quite sarcastic in tone, accompanied by driving maps and driving times (to show me how simply I might have gotten there to pick them up apparently). The fact that she failed to calculate the round-trip time is in my estimation significant. She also suggested that they might have taken a bus to the nearby town of Todi, which arrived at about 1:00 AM and that I should pick them up there when it arrived. I did not reply to the latter.

It came as a great surprise and concern to me that in the course of her correspondence on the above matter, Allison also revealed to me that she was an epileptic and subject to severe migraines. She had never expressed this to me before that point.

On Sunday, the group contacted me, indicating that they would arrive at the nearby Fratta Todina station at 2:00 PM. With this objective in mind, I drove to the station and waited for over an hour before I received a call on my cell indicating that they had again missed their train and that they would arrive at 4:00 PM. Since I had business in Perugia I drove there and returned to Fratta just after 4:00. Unfortunately, instead of waiting, Allison insisted on walking

up the hill to Monte Castello (45 minutes in good weather). Regrettably, they did not contact me with this plan change and proceeded up the hill. At the train station meanwhile, I waited for over an hour before she became fatigued with her walk and insisted that the other students call me. Approximately half-way in their path up our mountain, I received a call from one of the students asking us to pick them up. Since we were at the nearby train station, we arrived quickly. Upon locating the group at the side of the road we pulled over and parked. I told the group that before proceeding further we needed to discuss the situation with their weekend travel and the fact that I had spent several hours driving around looking for them. Allison complained that they could not reach me by phone, and thus could not contact me. This is strange since my phone was working and I was receiving calls. My call log showed no missed calls or messages, nor did I receive any email correspondence from them, save Allison's emails of complaint I described earlier. The latter clearly had no difficulties finding me. All three students travelling together had working cell phones.

I spoke to the group (then gathered in a parking area on the roadside) firmly and clearly about the situation. No one present expressed concerns about my tone or language, although I was understandably angry at the situation. As their supervisor, I notified the group that before proceeding up the hill we needed to have a discussion about policies and about hotels. I also told Allison that her tone in the emails was unacceptable and that if she did not change her behavior that we had no recourse but to tell her to pack her bags and go to the hotel next door for the remainder of her stay. She became incensed at this and told me: "I am about to get mad!" She then stormed off and sat on the guardrail about 20 feet from where we were parked. Feeling concern for her safety and that of the group, I instructed the other students to get in the car. I got in the car as well and asked my assistant Alexandra to speak to her and convince her to get in the car and ride up to the village with us and to further inform Allison that she (Alexandra) would accompany her to the school while she packed her bags and then would accompany her to the hotel in order to make sure she was able to check in. We waited without moving the car for about twenty minutes while Alexandra spoke to her. Alex returned to the car to inform me that Alison was quite agitated and that she refused to get in the car. After waiting for another ten minutes while Alex spoke to her a friend from the village drove by and Alex asked him to drive Allison up to the village. Allison accepted and they drove together to Monte Castello.

Upon reaching Monte Castello, Alexandra accompanied Allison, attempting to calm her down. In the course of the next hour or so, Allison telephoned her mother while Alexandra was present and Allison's mother asked to speak to her as a representative of ICA. I did not witness this, however Alexandra reported to me that Allison's mother was hostile and raised her voice to a level at which it made it necessary for Alexandra to inform the mother that if she did not moderate her tone, she would terminate the call. In the course of her conversation, Alexandra attempted to assure the mother that everything was safe, but that given the situation however, that we were well within our rights to insist that Allison leave the premises and move to the hotel if she did not moderate her behavior.

Ultimately, Allison returned to the ICA premises assuring Alex that she would moderate her tone. Allison chose to remain in her room for the remainder of the night. We sent dinner for her to her room.

The next morning, I asked Allison to come to the office (while I was accompanied by our manager, Eros Tassi) and I attempted to explain our position and policies. Allison almost immediately became confrontational and indicated that she did not work for me and that

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regardless of what others thought the parameters of the situation to be, she did not share the perception that she should be required to do manual labor. She indicated that she did not feel comfortable talking to me and that she was going to her room. When my assistant Alexandra arrived, I asked her to speak to Allison and try to reason with her. However in going to her room, Alexandra reported that Allison refused to speak to her and had locked herself in her room. She remained in this situation for a couple hours. Out of concern with the situation, I contacted our attorney, Alex Bonta in order to get advice on how to address the situation within the parameters of Italian law. Alex advised me that if Allison refused to leave the room and was not responding, I should contact the local police and ask them to address the situation. This became unnecessary however when Allison came downstairs from her room.

After speaking with you on the phone, I informed Allison that I felt that the best situation for her would be to continue to stay in our facilities for the remainder of her trip, without the obligation to work. I advised her that she could take her meals at the hotel at her own expense. She seemed quite comfortable with the situation and returned to her room.

A short while later I received a phone call from you indicating that USC would book a ticket for Allison and that she had chosen to leave early. As you know we arranged a hotel room for her and provided transport the next morning. She arrived at FCO by 8 AM.

From: VOROS, DAVID
Sent: Friday, August 26, 2016 1:40 PM
To: WELLS, CARL
Cc: WHITE, HENRY; MILLER, ALLEN; info; Marco Laracca
Subject: Re: From Carl R. Wells

Carl

To clarify, I mentioned nothing in the below about confirming a meeting with you.

1. You again indicated that I failed to respond to a message from you. This is not accurate and I must point out that this is the second time that you indicated that I failed to respond to a message from you, when on fact I had responded.

Regarding your recent message, I indicated below that in fact I emailed you three times in response to your previous email and received no response from you

2. I said I would consult with my attorney regarding your request for a meeting in person with you and will notify you in this regard.

3. As I understand it, a meeting with my counsel constitutes a meeting with me. I will run this by my attorney and make sure I am correct in my understanding.

Thanks

DV

Sent from my iPhone

On Aug 26, 2016, at 1:24 PM, "WELLS, CARL" <WELLSCR@mailbox.sc.edu> wrote:

Great! I look forward to meeting with you.

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Dunavant v. Voros

Sent from my Verizon Wireless 4G LTE smartphone

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

From: "VOROS, DAVID" <VOROS@mailbox.sc.edu>
Date: 26/08/2016 1:17 PM (GMT-05:00)
To: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>
Cc: "WHITE, HENRY" <HJWHITE@mailbox.sc.edu>, "MILLER, ALLEN" <MILLERPA@mailbox.sc.edu>, info <info@avvocati.us>
Subject: Re: From Carl R. Wells

Carl

To date, I have contacted you by email regarding a phone interview at least 3 times. I copied Allen Miller and my attorney on these email correspondences. In fact however, I received no response to any of my emails from you. For the record, will re-send my dated email correspondence to you and copy the above. Regarding Monday I will be in contact after consulting my attorney.

DV

Sent from my iPhone

On Aug 26, 2016, at 12:54 PM, "WELLS, CARL" <WELLSCR@mailbox.sc.edu> wrote:

I have asked you to respond to a complaint filed against you by Alison Dunavant.

While you have asked me to send the information to your lawyer, at this point I must inform you that you are in violation of our policy by not responding. Please know that if you would like for your lawyer to meet with us when you respond that is fine; however, be aware that the meeting is with you. Legal counsel can attend and even advise you quietly, but our meeting is with you.

At this point, I must move forward with my investigation, with or without your participation. Please contact me immediately to schedule a meeting. If I have not heard from you by Monday of next week, I will move on with the investigation without you.

Carl R. Wells, PhD

Assistant Director, Office of Equal Opportunity Programs
Deputy Title IX Coordinator

Office of Equal Opportunity Programs
1600 Hampton Street, Suite 805
Columbia, SC 29208

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(W) (803) 777-9560

(Fax) (803) 777-2296

www.sc.edu/eop

<image001.jpg>

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From: WELLS, CARL
To: VOROS, DAVID
Cc: WHITE, HENRY; MILLER, ALLEN; Info; Marco Laracca; ,
Subject: RE: From Carl R. Wells
Date: Friday, August 26, 2016 7:29:48 PM

While the statement is fine, I would still like to sit and talk with you about the ordeal. Let me know when you are available.

Sent from my Verizon Wireless 4G LTE smartphone

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

From: "VOROS, DAVID" <VOROS@mailbox.sc.edu>
 Date: 26/08/2016 7:27 PM (GMT-05:00)
 To: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>
 Cc: "WHITE, HENRY" <HJWHITE@mailbox.sc.edu>, "MILLER, ALLEN" <MILLERPA@mailbox.sc.edu>, info <info@avvocati.us>, Marco Laracca <mlaracca@bioandlaracca.com>, "," <icarts.info@gmail.com>
 Subject: RE: From Carl R. Wells

Carl,

Since there appears to be a good deal of confusion about our articulation on this matter, on the advice of my council, I have prepared the statement below. The below is, in fact, essentially the same in content as the message sent to Allen Miller on May 18, 2016, on which you and your office were copied. In fact, you referred to this summary in your email to me of May 19. Below is an expanded version of that document - again, the majority of which has already been in your, and in the University's possession since May 18. Beyond the below, I do not feel that I can add any more to my response in describing events surrounding Ms. Dunnnavant's tenure in Monte Castello. Please take the below, along with my account sent in May, as my written response to your inquiry - it was my assumption that you had already done this when the document was sent on May 18, and you confirmed its receipt.

Regarding your ascertainment that I was negligent in my response to your messages, I want to be clear: please note that as per Dr. Miller's message, I in fact responded to your August 10 email promptly on August 12 indicating I would get back to you after the upcoming week end. I then emailed you on Monday, August 15 requesting a phone appointment to discuss the matter on Tuesday, August 16. On August 16, having received no response from you, I wrote again on August 16 and again you failed to reply. Later on August 16, I indicated that you should be in direct contact with my attorney's since you were not responding to my messages. I copied Dr. Miller on all the above - he apparently received them.

Prior to this, you sent me an email on 6/24, in which you also indicated that I was negligent in responding to a letter attached to your previous message. Again this is inaccurate - as I pointed out and again, as Dr. Miller confirmed, since he was copied on the email. I am happy to resend these messages if you like and you can review the dates.

Regarding a meeting in person, considering what I perceive to be rather exhaustive

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correspondence on this matter, I feel I have little to add to the discussion at this point. However, should it be necessary to meet in person, I would be willing to attend a meeting - accompanied of course by my attorney.

Prior to scheduling this however (again on advice of my counsel) I would like you to clarify the following at your earliest convenience:

1. exactly what additional information you require from me in the conversation that has not already been provided
2. what is being demanded by the complainant
3. what action you are threatening against me

Please respond to the above as soon as possible and I will get back to you immediately. I will also copy all the above in order to insure that nothing is lost in the mail.

DV

MY RESPONSE:

To Whom It May Concern,

As per the request of Carl Wells at the Office of Equal Opportunity Programs at the University of South Carolina, I am providing below the circumstances regarding the situation that occurred in Italy last May with Allison Dunavant, during her stay at the ICARTS, SRL facility: "Asilo" located in Monte Castello di Vibio, Umbria (PG), Italy.

After speaking with Allison prior to her departure and reflecting on circumstances surrounding these issues, my opinion and - as described later in this account, the perspective of others who witnessed our interactions - is that Allison's version of events, as well as her understanding of her verbal agreement with ICA does not accurately represent what transpired. Nonetheless, I feel that both I - and ICA as a whole - have acted rationally, responsibly, and appropriately in addressing the situation. Further, that we have acted in a way that is in keeping with company protocols developed in context of both U.S. and Italian labor law.

Repeatedly in her complaint to EOP, Allison makes the assertion that she was held in "dangerous" conditions, denied food, and treated unfairly. These allegations are not true. In fact, Allison resided at the ICARTS for more than a week without mention of ever feeling unsafe, and in fact, expressed satisfaction with the facility and the beauty of the village and its vista's.

Considering the condition of our facility, it should be noted that other visitors have not shared Allison's assessment. In fact, I have in my possession a letter from Mark Buyck, chair of the Board of Trustees at USC who was quite literally, the last person in the building before we closed in late August 2015. After his visit, Mark Buyck wrote a letter to me, on which he copied USC President, Harris Pastides, describing the facility as a tremendous asset to the university." Between Mark Buyck's visit and the time the facility opened for the USC group in May of 2016 (about a week after Allison's stay) the facility was closed and was locked up securely. The possibility that the facility should deteriorate to a "dangerous" level securely

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locked up and unused, seems implausible and in fact, was not the case. Further, to my knowledge, none of the participants in the USC in Italy group arriving about a week after Alison's departure felt the facility was dangerous or not well maintained. Alison description of the mattress she slept on as so saturated with cat urine that when she returned home she had to throw away her sheets seems to me a clear fabrication. In fact, at the close of the 2015 season, all bedding and towels were removed by our linen service and the sheets Alison used while she was here were ones that I lent her from my own house and they were left by her on the bed in a wad when she left the building. The mattresses she used were the same ones utilized by Allen Miller during his stay in Monte Castello and were subsequently used by USC students occupying the same room just a week after Alison departed. To my knowledge no one in that group complained about the level of saturation of cat urine in mattresses.

During her stay, Alison was provided with 3 quite generous meals per day, prepared by myself and our other assistance in residence in that period. During that time, Alison never mentioned a lack of food or dissatisfaction with what she was provided.

Regarding her treatment, during the time proceeding the incident returning from Rome, Alison never complained about her work-load or about being treated unfairly, although our assistant, Alexandra Miller spoke to her a couple times regarding her pace and lack of participation in preparing group meals and subsequent clean up. Along these lines, while she indicates in her complaint that she did not anticipate the type of work she was ultimately expected to do in Monte Castello (or the duration of it), Alison did not complain about these issues to me. In her complaint to USC she describes anticipating light cleaning and other such duties and makes the assertion that ultimately the work load was much more demanding. Later in her narrative however, when she describes the specific activities she took part in, she ultimately describes activities that would clearly fall within the category of cleaning and painting and were the exact activities I described to her before she departed the US.

Allison makes the complaint that she was required to sleep in temperatures below 40 degrees F. This is not accurate. Alison's visit occurred in the second week of May, when temperatures in central Italy seldom fall below the 50's and 60's.

In terms of background to the situation, I should point out first that it has long been a tradition with the art school in Monte Castello to provide working scholarships for students as a means of helping talented students from less affluent families study in Italy. As I expressed to you numerous times, coming myself from a family of limited means and thus unable to study abroad, this is a particular mission of mine. However, this is also a common practice among artist residencies around the world and I invite you to search Artist Residences in Italy and you will soon find among the many options: working scholarships. At ICA, we will provide six of these opportunities for students from diverse institutions and for varying periods of time in the course of the summer. Despite our objective at ICA to provide opportunities to disadvantaged students however, common sense would dictate that as an employer and business-person, I must also be vigilant to the needs of our company and coordinate things in an effective manner. This includes notifying employees if their performance is sub-standard. I believe this is not only entirely reasonable, but expected.

Regarding the current situation with USC students: ICA offered working scholarships to 3 students from USC: two graduate students and one undergraduate student. All three sought to participate in the USC in Italy program, however all were unable to find sufficient financial support for their endeavor. One student's need was so great in fact, (in contrast to his initiative) that we also elected to purchase his transatlantic plane ticket.

This spring, one of the USC students, Allison Dunavant, came to me complaining that as a graduate student, there were no sources of aid available to her through USC Study Abroad. As you recall, I referred her to you. Your advice (according to my recollection) was for Allison to seek funding through the department or college. With this in mind, I advised her to apply for CAS funding and assisted her in applying for a CAS scholarship for grad students. Together with my colleague, Andrew Graciano (whose input I encourage you to seek), coordinator of our grad program in SVAD at USC, I recommended her for the funding. Andrew also recommended her for another grant, for which I provided a letter of support to the college.

Ultimately, because I felt that these three were serious and committed students I met with them together in mid-March off-campus and I told them of the opportunities for work-study scholarships provided by ICA. In this case, their activities would be in preparation for the USC group on May 23.

The situation our company offered them was that in exchange for working five hours per day, five days per week, ICA would provide accommodations, meals, and studio space for them. I made it clear that during their off-time, they could travel at their own expense, but that sometimes they could also accompany me on errands to locations that could be of interest to them and to remain there (again returning at their own expense) on the week end, without reservation. At the time, we discussed the parameters of their duties and obligations at length, I will also point out that we had numerous meetings together after the groups arrival to confirm the implementation of this schedule in terms of daily events. I feel quite confident that after speaking with the rest of the group that they were clear on the parameters of the arrangement.

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in her abilities. Alexandra reported to me that while Allison was argumentative, she agreed to comply.

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Nonetheless, they failed to check the schedule and did not look into the departure times of the connecting train until they reached Terni. As a result, the group was stranded at Terni on Saturday night. They informed me by phone that they had missed the train at approximately 8:00 PM. As per our discussion, I told them that they had two options:

1. Stay at a hotel in Terni and continue on the next day
2. Our driver could pick them up at Terni for €20 per person. (The payment is made directly to our driver, Carlo Innocenti and is a very reasonable rate.)

They decided to stay in Terni and continue on the next day. Later that night however, I received two emails from Allison that I found most inappropriate in tone and disrespectful. I have forwarded these messages to you. In summary, she indicated her frustration that I was not willing to pick them up in Terni after 9:00 PM (a 45minute drive each way, door to door. I

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calculate an additional 15 minutes on each end for loading and traffic and thus this represents a two – hour drive.) Allison appeared incensed that I refused to do so. In fact, she sent me a message that I felt to be quite sarcastic in tone, accompanied by driving maps and driving times (to show me how simply I might have gotten there to pick them up apparently). The fact that she failed to calculate the round-trip time is in my estimation significant. She also suggested that they might have taken a bus to the nearby town of Todi, which arrived at about 1:00 AM and that I should pick them up there when it arrived. I did not reply to the latter.

It came as a great surprise and concern to me that in the course of her correspondence on the above matter, Allison also revealed to me that she was an epileptic and subject to severe migraines. She had never expressed this to me before that point.

On Sunday, the group contacted me, indicating that they would arrive at the nearby Fratta Todina station at 2:00 PM. With this objective in mind, I drove to the station and waited for over an hour before I received a call on my cell indicating that they had again missed their train and that they would arrive at 4:00 PM. Since I had business in Perugia I drove there and returned to Fratta just after 4:00. Unfortunately, instead of waiting, Allison insisted on walking up the hill to Monte Castello (45 minutes in good weather). Regrettably, they did not contact me with this plan change and proceeded up the hill. At the train station meanwhile, I waited for over an hour before she became fatigued with her walk and insisted that the other students call me. Approximately half-way in their path up our mountain, I received a call from one of the students asking us to pick them up. Since we were at the nearby train station, we arrived quickly. Upon locating the group at the side of the road we pulled over and parked. I told the group that before proceeding further we needed to discuss the situation with their weekend travel and the fact that I had spent several hours driving around looking for them. Allison complained that they could not reach me by phone, and thus could not contact me. This is strange since my phone was working and I was receiving calls. My call log showed no missed calls or messages, nor did I receive any email correspondence from them, save Allison's emails of complaint I described earlier. The latter clearly had no difficulties finding me. All three students travelling together had working cell phones.

I spoke to the group (then gathered in a parking area on the roadside) firmly and clearly about the situation. No one present expressed concerns about my tone or language, although I was understandably angry at the situation. As their supervisor, I notified the group that before proceeding up the hill we needed to have a discussion about policies and about hotels. I also told Allison that her tone in the emails was unacceptable and that if she did not change her behavior that we had no recourse but to tell her to pack her bags and go to the hotel next door for the remainder of her stay. She became incensed at this and told me: "I am about to get mad!" She then stormed off and sat on the guardrail about 20 feet from where we were parked. Feeling concern for her safety and that of the group, I instructed the other students to get in the car. I got in the car as well and asked my assistant Alexandra to speak to her and convince her to get in the car and ride up to the village with us and to further inform Allison that she (Alexandra) would accompany her to the school while she packed her bags and then would accompany her to the hotel in order to make sure she was able to check in. We waited without moving the car for about twenty minutes while Alexandra spoke to her. Alex returned to the car to inform me that Alison was quite agitated and that she refused to get in the car. After waiting for another ten minutes while Alex spoke to her a friend from the village drove by and Alex asked him to drive Alison up to the village. Alison accepted and they drove together to Monte Castello.

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Upon reaching Monte Castello, Alexandra accompanied Allison, attempting to calm her down. In the course of the next hour or so, Allison telephoned her mother while Alexandra was present and Allison's mother asked to speak to her as a representative of ICA. I did not witness this, however Alexandra reported to me that Allison's mother was hostile and raised her voice to a level at which it made it necessary for Alexandra to inform the mother that if she did not moderate her tone, she would terminate the call. In the course of her conversation, Alexandra attempted to assure the mother that everything was safe, but that given the situation however, that we were well within our rights to insist that Allison leave the premises and move to the hotel if she did not moderate her behavior.

Ultimately, Allison returned to the ICA premises assuring Alex that she would moderate her tone. Allison chose to remain in her room for the remainder of the night. We sent dinner for her to her room.

The next morning, I asked Allison to come to the office (while I was accompanied by our manager, Eros Tassi) and I attempted to explain our position and policies. Allison almost immediately became confrontational and indicated that she did not work for me and that regardless of what others thought the parameters of the situation to be, she did not share the perception that she should be required to do manual labor. She indicated that she did not feel comfortable talking to me and that she was going to her room. When my assistant Alexandra arrived, I asked her to speak to Allison and try to reason with her. However in going to her room, Alexandra reported that Allison refused to speak to her and had locked herself in her room. She remained in this situation for a couple hours. Out of concern with the situation, I contacted our attorney, Alex Bonta in order to get advice on how to address the situation within the parameters of Italian law. Alex advised me that if Allison refused to leave the room and was not responding, I should contact the local police and ask them to address the situation. This became unnecessary however when Allison came downstairs from her room.

After speaking with you on the phone, I informed Allison that I felt that the best situation for her would be to continue to stay in our facilities for the remainder of her trip, without the obligation to work. I advised her that she could take her meals at the hotel at her own expense. She seemed quite comfortable with the situation and returned to her room.

A short while later I received a phone call from you indicating that USC would book a ticket for Allison and that she had chosen to leave early. As you know we arranged a hotel room for her and provided transport the next morning. She arrived at FCO by 8 AM.

From: VOROS, DAVID
Sent: Friday, August 26, 2016 1:40 PM
To: WELLS, CARL
Cc: WHITE, HENRY; MILLER, ALLEN; info; Marco Laracca
Subject: Re: From Carl R. Wells

Carl

To clarify, I mentioned nothing in the below about confirming a meeting with you.

1. You again indicated that I failed to respond to a message from you. This is not accurate and I must point out that this is the second time that you indicated that I failed to respond to a message from you, when on fact I had responded.

Regarding your recent message, I indicated below that in fact I emailed you three times in response to your previous email and received no response from you

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2. I said I would consult with my attorney regarding your request for a meeting in person with you and will notify you in this regard.

3. As I understand it, a meeting with my counsel constitutes a meeting with me. I will run this by my attorney and make sure I am correct in my understanding.

Thanks

DV

Sent from my iPhone

On Aug 26, 2016, at 1:24 PM, "WELLS, CARL" <WELLSCR@mailbox.sc.edu> wrote:

Great! I look forward to meeting with you.

Sent from my Verizon Wireless 4G LTE smartphone

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

From: "VOROS, DAVID" <VOROS@mailbox.sc.edu>
 Date: 26/08/2016 1:17 PM (GMT-05:00)
 To: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>
 Cc: "WHITE, HENRY" <HJWHITE@mailbox.sc.edu>, "MILLER, ALLEN" <MILLERPA@mailbox.sc.edu>, info <info@avvocati.us>
 Subject: Re: From Carl R. Wells

Carl

To date, I have contacted you by email regarding a phone interview at least 3 times. I copied Allen Miller and my attorney on these email correspondences. In fact however, I received no response to any of my emails from you. For the record, will re-send my dated email correspondence to you and copy the above. Regarding Monday I will be in contact after consulting my attorney.

DV

Sent from my iPhone

On Aug 26, 2016, at 12:54 PM, "WELLS, CARL" <WELLSCR@mailbox.sc.edu> wrote:

I have asked you to respond to a complaint filed against you by Alison Dunavant.

While you have asked me to send the information to your lawyer, at this point I must inform you that you are in violation of our policy by not responding. Please know that if you would like for your lawyer to meet

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with us when you respond that is fine; however, be aware that the meeting is with you. Legal counsel can attend and even advise you quietly, but our meeting is with you.

At this point, I must move forward with my investigation, with or without your participation. Please contact me immediately to schedule a meeting. If I have not heard from you by Monday of next week, I will move on with the investigation without you.

Carl R. Wells, PhD

Assistant Director, Office of Equal Opportunity Programs
Deputy Title IX Coordinator

Office of Equal Opportunity Programs
1600 Hampton Street, Suite 805
Columbia, SC 29208
(W) (803) 777-9560
(Fax) (803) 777-2296
www.sc.edu/eop
<image001.jpg>

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From: VOROS, DAVID
To: WELLS, CARL
Cc: WHITE, HENRY; MILLER, ALLEN; info; Marco Laracca; ,
Subject: RE: From Carl R. Wells
Date: Friday, August 26, 2016 8:36:24 PM

Prior to scheduling this however (again on advice of my counsel) I would like you to clarify the following at your earliest convenience:

1. exactly what additional information you require from me in the conversation that has not already been provided
2. what is being demanded by the complainant
3. what action you are threatening against me

Please respond to the above as soon as possible and I will get back to you immediately. I will also copy all the above in order to insure that nothing is lost in the mail.

DV

From: WELLS, CARL
Sent: Friday, August 26, 2016 7:29 PM
To: VOROS, DAVID
Cc: WHITE, HENRY; MILLER, ALLEN; info; Marco Laracca; ,
Subject: RE: From Carl R. Wells

While the statement is fine, I would still like to sit and talk with you about the ordeal. Let me know when you are available.

Sent from my Verizon Wireless 4G LTE smartphone

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

From: "VOROS, DAVID" <VOROS@mailbox.sc.edu>
Date: 26/08/2016 7:27 PM (GMT-05:00)
To: "WELLS, CARL" <WELLSCHR@mailbox.sc.edu>
Cc: "WHITE, HENRY" <HJWHITE@mailbox.sc.edu>, "MILLER, ALLEN" <MILLERPA@mailbox.sc.edu>, info <info@avvocati.us>, Marco Laracca <mlaracca@bioandlaracca.com>, "," <icarts.info@gmail.com>
Subject: RE: From Carl R. Wells

Carl,

Since there appears to be a good deal of confusion about our articulation on this matter, on the advice of my council, I have prepared the statement below. The below is, in fact, essentially the same in content as the message sent to Allen Miller on May 18, 2016, on which you and your office were copied. In fact, you referred to this summary in your email to me of May 19. Below is an expanded version of that document - again, the majority of which has already

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been in your, and in the University's possession since May 18. Beyond the below, I do not feel that I can add any more to my response in describing events surrounding Ms. Dunnnavant's tenure in Monte Castello. Please take the below, along with my account sent in May, as my written response to your inquiry - it was my assumption that you had already done this when the document was sent on May 18, and you confirmed its receipt.

Regarding your ascertains that I was negligent in my response to your messages, I want to be clear: please note that as per Dr. Miller's message, I in fact responded to your August 10 email promptly on August 12 indicating I would get back to you after the upcoming week end. I then emailed you on Monday, August 15 requesting a phone appointment to discuss the matter on Tuesday, August 16. On August 16, having received no response from you, I wrote again on August 16 and again you failed to reply. Later on August 16, I indicated that you should be in direct contact with my attorney's since you were not responding to my messages. I copied Dr. Miller on all the above - he apparently received them.

Prior to this, you sent me an email on 6/24, in which you also indicated that I was negligent in responding to a letter attached to your previous message. Again this is inaccurate - as I pointed out and again, as Dr. Miller confirmed, since he was copied on the email. I am happy to resend these messages if you like and you can review the dates.

Regarding a meeting in person, considering what I perceive to be rather exhaustive correspondence on this matter, I feel I have little to add to the discussion at this point. However, should it be necessary to meet in person, I would be willing to attend a meeting - accompanied of course by my attorney.

Prior to scheduling this however (again on advice of my counsel) I would like you to clarify the following at your earliest convenience:

1. exactly what additional information you require from me in the conversation that has not already been provided
2. what is being demanded by the complainant
3. what action you are threatening against me

Please respond to the above as soon as possible and I will get back to you immediately. I will also copy all the above in order to insure that nothing is lost in the mail.

DV

MY RESPONSE:

To Whom It May Concern,

As per the request of Carl Wells at the Office of Equal Opportunity Programs at the University of South Carolina, I am providing below the circumstances regarding the situation that occurred in Italy last May with Allison Dunavant, during her stay at the ICARTS, SRL facility: "Asilo" located in Monte Castello di Vibio, Umbria (PG), Italy.

After speaking with Allison prior to her departure and reflecting on circumstances surrounding

these issues, my opinion and - as described later in this account, the perspective of others who witnessed our interactions - is that Allison's version of events, as well as her understanding of her verbal agreement with ICA does not accurately represent what transpired. Nonetheless, I feel that both I - and ICA as a whole - have acted rationally, responsibly, and appropriately in addressing the situation. Further, that we have acted in a way that is in keeping with company protocols developed in context of both U.S. and Italian labor law.

Repeatedly in her complaint to EOP, Allison makes the assertion that she was held in "dangerous" conditions, denied food, and treated unfairly. These allegations are not true. In fact, Allison resided at the ICARTS for more than a week without mention of ever feeling unsafe, and in fact, expressed satisfaction with the facility and the beauty of the village and its vista's.

Considering the condition of our facility, it should be noted that other visitors have not shared Allison's assessment. In fact, I have in my possession a letter from Mark Buyck, chair of the Board of Trustees at USC who was quite literally, the last person in the building before we closed in late August 2015. After his visit, Mark Buyck wrote a letter to me, on which he copied USC President, Harris Pastides, describing the facility as a tremendous asset to the university." Between Mark Buyck's visit and the time the facility opened for the USC group in May of 2016 (about a week after Allison's stay) the facility was closed and was locked up securely. The possibility that the facility should deteriorate to a "dangerous" level securely locked up and unused, seems implausible and in fact, was not the case. Further, to my knowledge, none of the participants in the USC in Italy group arriving about a week after Alison's departure felt the facility was dangerous or not well maintained. Allison description of the mattress she slept on as so saturated with cat urine that when she returned home she had to throw away her sheets seems to me a clear fabrication. In fact, at the close of the 2015 season, all bedding and towels were removed by our linen service and the sheets Allison used while she was here were ones that I lent her from my own house and they were left by her on the bed in a wad when she left the building. The mattresses she used were the same ones utilized by Allen Miller during his stay in Monte Castello and were subsequently used by USC students occupying the same room just a week after Allison departed. To my knowledge no one in that group complained about the level of saturation of cat urine in mattresses.

During her stay, Allison was provided with 3 quite generous meals per day, prepared by myself and our other assistance in residence in that period. During that time, Allison never mentioned a lack of food or dissatisfaction with what she was provided.

Regarding her treatment, during the time proceeding the incident returning from Rome, Allison never complained about her work-load or about being treated unfairly, although our assistant, Alexandra Miller spoke to her a couple times regarding her pace and lack of participation in preparing group meals and subsequent clean up. Along these lines, while she indicates in her complaint that she did not anticipate the type of work she was ultimately expected to do in Monte Castello (or the duration of it), Allison did not complain about these issues to me. In her complaint to USC she describes anticipating light cleaning and other such duties and makes the assertion that ultimately the work load was much more demanding. Later in her narrative however, when she describes the specific activities she took part in, she ultimately describes activities that would clearly fall within the category of cleaning and painting and were the exact activities I described to her before she departed the US.

Allison makes the complaint that she was required to sleep in temperatures below 40 degrees F. This is not accurate. Allison's visit occurred in the second week of May, when temperatures

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in central Italy seldom fall below the 50's and 60's.

In terms of background to the situation, I should point out first that it has long been a tradition with the art school in Monte Castello to provide working scholarships for students as a means of helping talented students from less affluent families study in Italy. As I expressed to you numerous times, coming myself from a family of limited means and thus unable to study abroad, this is a particular mission of mine. However, this is also a common practice among artist residencies around the world and I invite you to search Artist Residences in Italy and you will soon find among the many options: working scholarships. At ICA, we will provide six of these opportunities for students from diverse institutions and for varying periods of time in the course of the summer. Despite our objective at ICA to provide opportunities to disadvantaged students however, common sense would dictate that as an employer and business-person, I must also be vigilant to the needs of our company and coordinate things in an effective manner. This includes notifying employees if their performance is sub-standard. I believe this is not only entirely reasonable, but expected.

Regarding the current situation with USC students: ICA offered working scholarships to 3 students from USC: two graduate students and one undergraduate student. All three sought to participate in the USC in Italy program, however all were unable to find sufficient financial support for their endeavor. One student's need was so great in fact, (in contrast to his initiative) that we also elected to purchase his transatlantic plane ticket.

This spring, one of the USC students, Allison Dunavant, came to me complaining that as a graduate student, there were no sources of aid available to her through USC Study Abroad. As you recall, I referred her to you. Your advice (according to my recollection) was for Allison to seek funding through the department or college. With this in mind, I advised her to apply for CAS funding and assisted her in applying for a CAS scholarship for grad students. Together with my colleague, Andrew Graciano (whose input I encourage you to seek), coordinator of our grad program in SVAD at USC, I recommended her for the funding. Andrew also recommended her for another grant, for which I provided a letter of support to the college.

Ultimately, because I felt that these three were serious and committed students I met with them together in mid-March off-campus and I told them of the opportunities for work-study scholarships provided by ICA. In this case, their activities would be in preparation for the USC group on May 23.

The situation our company offered them was that in exchange for working five hours per day, five days per week, ICA would provide accommodations, meals, and studio space for them. I made it clear that during their off-time, they could travel at their own expense, but that sometimes they could also accompany me on errands to locations that could be of interest to them and to remain there (again returning at their own expense) on the week end, without reservation. At the time, we discussed the parameters of their duties and obligations at length. I will also point out that we had numerous meetings together after the group's arrival to confirm the implementation of this schedule in terms of daily events. I feel quite confident that after speaking with the rest of the group that they were clear on the parameters of the arrangement.

Upon the students arrival - and until Friday - all seemed to be going according to plan and all seemed satisfied. The group was assigned tasks around the building that included painting walls and cleaning as previously agreed. The work was not particularly strenuous and no one

expressed complaints or indicated any health issues that would hinder the performance of their duties. Overall, the group was clearly enjoying the experience and were also producing artwork, which we discussed as a group. In the course of my own activities, I took them to visit museums in Perugia and Assisi, where we spoke together about masterpieces in the collections. Throughout their stay they had been provided meals, which we prepared communally, which we will continue to do until our kitchen opens on Thursday.

In the course of their stay thus far, I have met with the group frequently and discussed the workload and conditions (as we continue to do) and to plan future activities - all seemed agreeable that it was a fair arrangement and in keeping with our verbal agreement and their expectations. Allison was of course engaged in this discussion and expressed no reservations about the type of work she was assigned or the workload, nor did she at any time advise me of any health concerns that would impair her ability to work, or that could otherwise endanger others. Despite the fact that she voiced no objections to the work or workload to me directly, several students expressed to me that Allison told them that if I wanted certain work done (such as cleaning) I should do it myself. Following our Thursday meeting, two of the students came to me afterward expressing frustration that they felt Allison was not doing her share of work and placing additional burden on them to complete their tasks. Both expressed that were frustrated that Allison seemed to be spending a lot of time on the phone and that her work pace was erratic. I spoke to her about this and also advised my assistant, Alexandra to more closely monitor Allison's work progress and to assign appropriate tasks to what appeared to be in her abilities. Alexandra reported to me that while Allison was argumentative, she agreed to comply.

I became quite concerned about the situation developing in Monte Castello with her peers and spoke to Allison about her job performance in Monte Castello. In the course of our conversation, Allison agreed to apply herself, but was argumentative. Afterward, other students came to me in confidence and reported that she told them that she did not feel that she needed to acknowledge me as her supervisor and complained that she did not feel a need to do manual labor. This of course seemed strange to me, since I quite clearly explained the activities the group would engage in in exchange for their stay and no one felt his unreasonable.

On Friday Allison failed to show up to work, complaining of a headache. Allison then slept until lunch and then afterward spent the remainder of the day packing for the weekend trip to Rome while the other students worked. Allison appeared to be in good health and spirits at that time. The other students appeared quite agitated about the situation and complained. Consequently, I asked Alexandra to speak to Allison again when the group returned from their trip on Saturday.

On Friday afternoon, since I had business in Rome, I agreed to take the students to a suburban Rome location from which they could take a bus into the city. My colleagues, Eros, our general manager and Alexandra our staff manager, and I dropped them off at a central bus station where they could find transport to their hotel in Rome, where I had made a booking for them (Best Western Canada). Alex, Eros, and I walked with them to the bus stop to be sure they got on the correct bus. I provided them with a map and an itinerary for Rome and specific instructions on how to find their hotel as well as information regarding their return trip.

The group was instructed that upon arrival at the bus station at Rome Termini, they would enter the station and in passing through en route to their hotel, they would confirm their return

schedule and email me the details. (In our departure conversation, we emphasized that they should check the return schedule because they would have to transfer trains on their return at the city of Terni, about 45 minutes drive from Monte Castello and the small train line to Monte Castello provided limited service in the late night hours.) I told them quite specifically about ICA's policies regarding off-campus travel and they were clear that if they could not make their connection, they would remain in Terni overnight.

Nonetheless, they failed to check the schedule and did not look into the departure times of the connecting train until they reached Terni. As a result, the group was stranded at Terni on Saturday night. They informed me by phone that they had missed the train at approximately 8:00 PM. As per our discussion, I told them that they had two options:

1. Stay at a hotel in Terni and continue on the next day
2. Our driver could pick them up at Terni for €20 per person. (The payment is made directly to our driver, Carlo Innocenti and is a very reasonable rate.)

They decided to stay in Terni and continue on the next day. Later that night however, I received two emails from Allison that I found most inappropriate in tone and disrespectful. I have forwarded these messages to you. In summary, she indicated her frustration that I was not willing to pick them up in Terni after 9:00 PM (a 45minute drive each way, door to door. I calculate an additional 15 minutes on each end for loading and traffic and thus this represents a two – hour drive.) Allison appeared incensed that I refused to do so. In fact, she sent me a message that I felt to be quite sarcastic in tone, accompanied by driving maps and driving times (to show me how simply I might have gotten there to pick them up apparently). The fact that she failed to calculate the round-trip time is in my estimation significant. She also suggested that they might have taken a bus to the nearby town of Todi, which arrived at about 1:00 AM and that I should pick them up there when it arrived. I did not reply to the latter.

It came as a great surprise and concern to me that in the course of her correspondence on the above matter, Allison also revealed to me that she was an epileptic and subject to severe migraines. She had never expressed this to me before that point.

On Sunday, the group contacted me, indicating that they would arrive at the nearby Fratta Todina station at 2:00 PM. With this objective in mind, I drove to the station and waited for over an hour before I received a call on my cell indicating that they had again missed their train and that they would arrive at 4:00 PM. Since I had business in Perugia I drove there and returned to Fratta just after 4:00. Unfortunately, instead of waiting, Allison insisted on walking up the hill to Monte Castello (45 minutes in good weather). Regrettably, they did not contact me with this plan change and proceeded up the hill. At the train station meanwhile, I waited for over an hour before she became fatigued with her walk and insisted that the other students call me. Approximately half-way in their path up our mountain, I received a call from one of the students asking us to pick them up. Since we were at the nearby train station, we arrived quickly. Upon locating the group at the side of the road we pulled over and parked. I told the group that before proceeding further we needed to discuss the situation with their weekend travel and the fact that I had spent several hours driving around looking for them. Allison complained that they could not reach me by phone, and thus could not contact me. This is strange since my phone was working and I was receiving calls. My call log showed no missed calls or messages, nor did I receive any email correspondence from them, save Allison's emails of complaint I described earlier. The latter clearly had no difficulties finding me. All

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Upon reaching Monte Castello, Alexandra accompanied Allison, attempting to calm her down. In the course of the next hour or so, Allison telephoned her mother while Alexandra was present and Allison's mother asked to speak to her as a representative of ICA. I did not witness this, however Alexandra reported to me that Allison's mother was hostile and raised her voice to a level at which it made it necessary for Alexandra to inform the mother that if she did not moderate her tone, she would terminate the call. In the course of her conversation, Alexandra attempted to assure the mother that everything was safe, but that given the situation however, that we were well within our rights to insist that Allison leave the premises and move to the hotel if she did not moderate her behavior.

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After speaking with you on the phone, I informed Allison that I felt that the best situation for

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her would be to continue to stay in our facilities for the remainder of her trip, without the obligation to work. I advised her that she could take her meals at the hotel at her own expense. She seemed quite comfortable with the situation and returned to her room.

A short while later I received a phone call from you indicating that USC would book a ticket for Allison and that she had chosen to leave early. As you know we arranged a hotel room for her and provided transport the next morning. She arrived at FCO by 8 AM.

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Date: 26/08/2016 1:17 PM (GMT-05:00)
To: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>
Cc: "WHITE, HENRY" <HJWHITE@mailbox.sc.edu>, "MILLER, ALLEN" <MILLERPA@mailbox.sc.edu>, info <info@avvocati.us>
Subject: Re: From Carl R. Wells

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Carl

To date, I have contacted you by email regarding a phone interview at least 3 times. I copied Allen Miller and my attorney on these email correspondences. In fact however, I received no response to any of my emails from you. For the record, I will re-send my dated email correspondence to you and copy the above. Regarding Monday I will be in contact after consulting my attorney.

DV

Sent from my iPhone

On Aug 26, 2016, at 12:54 PM, "WELLS, CARL" <WELLSCR@mailbox.sc.edu> wrote:

I have asked you to respond to a complaint filed against you by Alison Dunavant.

While you have asked me to send the information to your lawyer, at this point I must inform you that you are in violation of our policy by not responding. Please know that if you would like for your lawyer to meet with us when you respond that is fine; however, be aware that the meeting is with you. Legal counsel can attend and even advise you quietly, but our meeting is with you.

At this point, I must move forward with my investigation, with or without your participation. Please contact me immediately to schedule a meeting. If I have not heard from you by Monday of next week, I will move on with the investigation without you.

Carl R. Wells, PhD

Assistant Director, Office of Equal Opportunity Programs
Deputy Title IX Coordinator

Office of Equal Opportunity Programs
1600 Hampton Street, Suite 805
Columbia, SC 29208
(W) (803) 777-9560
(Fax) (803) 777-2296
www.sc.edu/eop
<image001.jpg>

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Dunavant v. Voros

USC - 0286

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From: VOROS, DAVID
To: WELLS, CARL
Cc: WHITE, HENRY; MILLER, ALLEN; info; Marco Laracca; ,
Subject: RE: From Carl R. Wells
Date: Monday, August 29, 2016 6:16:45 AM

Carl,

I'll be on campus this AM and could review my statement with you if you have time in your schedule. I have an 11:00 AM appointment however. Please let me know your thoughts.

David

From: WELLS, CARL
Sent: Saturday, August 27, 2016 10:50 AM
To: VOROS, DAVID
Cc: WHITE, HENRY; MILLER, ALLEN; info; Marco Laracca; ,
Subject: RE: From Carl R. Wells

From: VOROS, DAVID
Sent: Friday, August 26, 2016 8:36 PM
To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Cc: WHITE, HENRY <HJWHITE@mailbox.sc.edu>; MILLER, ALLEN <MILLERPA@mailbox.sc.edu>; info <info@avvocati.us>; Marco Laracca <mlaracca@bioandlaracca.com>; , <icarts.info@gmail.com>
Subject: RE: From Carl R. Wells

Prior to scheduling this however (again on advice of my counsel) I would like you to clarify the following at your earliest convenience:

1. exactly what additional information you require from me in the conversation that has not already been provided

We will simply ask questions in regard your statement and her statement.

2. what is being demanded by the complainant

It is a University investigation to determine if any of our policies have been violated.

3. what action you are threatening against me

We are not threatening any action.

Please respond to the above as soon as possible and I will get back to you immediately. I will also copy all the above in order to insure that nothing is lost in the mail.

DV

From: WELLS, CARL
Sent: Friday, August 26, 2016 7:29 PM
To: VOROS, DAVID
Cc: WHITE, HENRY; MILLER, ALLEN; info; Marco Laracca; ,
Subject: RE: From Carl R. Wells

While the statement is fine, I would still like to sit and talk with you about the ordeal. Let me know

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when you are available.

Sent from my Verizon Wireless 4G LTE smartphone

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

From: "VOROS, DAVID" <VOROS@mailbox.sc.edu>
 Date: 26/08/2016 7:27 PM (GMT-05:00)
 To: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>
 Cc: "WHITE, HENRY" <HJWHITE@mailbox.sc.edu>, "MILLER, ALLEN" <MILLERPA@mailbox.sc.edu>, info <info@avvocati.us>, Marco Laracca <mlaracca@bioandlaracca.com>, ";" <carts.info@gmail.com>
 Subject: RE: From Carl R. Wells

Carl,

Since there appears to be a good deal of confusion about our articulation on this matter, on the advice of my council, I have prepared the statement below. The below is, in fact, essentially the same in content as the message sent to Allen Miller on May 18, 2016, on which you and your office were copied. In fact, you referred to this summary in your email to me of May 19. Below is an expanded version of that document - again, the majority of which has already been in your, and in the University's possession since May 18. Beyond the below, I do not feel that I can add any more to my response in describing events surrounding Ms. Dunnnavant's tenure in Monte Castello. Please take the below, along with my account sent in May, as my written response to your inquiry - it was my assumption that you had already done this when the document was sent on May 18, and you confirmed its receipt.

Regarding your ascertains that I was negligent in my response to your messages, I want to be clear: please note that as per Dr. Miller's message, I in fact responded to your August 10 email promptly on August 12 indicating I would get back to you after the upcoming week end. I then emailed you on Monday, August 15 requesting a phone appointment to discuss the matter on Tuesday, August 16. On August 16, having received no response from you, I wrote again on August 16 and again you failed to reply. Later on August 16, I indicated that you should be in direct contact with my attorney's since you were not responding to my messages. I copied Dr. Miller on all the above - he apparently received them.

Prior to this, you sent me an email on 6/24, in which you also indicated that I was negligent in responding to a letter attached to your previous message. Again this is inaccurate - as I pointed out and again, as Dr. Miller confirmed, since he was copied

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on the email. I am happy to re-send these messages if you like and you can review the dates.

Regarding a meeting in person, considering what I perceive to be rather exhaustive correspondence on this matter, I feel I have little to add to the discussion at this point. However, should it be necessary to meet in person, I would be willing to attend a meeting - accompanied of course by my attorney.

Prior to scheduling this however (again on advice of my counsel) I would like you to clarify the following at your earliest convenience:

1. exactly what additional information you require from me in the conversation that has not already been provided
2. what is being demanded by the complainant
3. what action you are threatening against me

Please respond to the above as soon as possible and I will get back to you immediately. I will also copy all the above in order to insure that nothing is lost in the mail.

DV

MY RESPONSE:

To Whom It May Concern,

As per the request of Carl Wells at the Office of Equal Opportunity Programs at the University of South Carolina, I am providing below the circumstances regarding the situation that occurred in Italy last May with Allison Dunavant, during her stay at the ICARTS, SRL facility: "Asilo" located in Monte Castello di Vibio, Umbria (PG), Italy.

After speaking with Allison prior to her departure and reflecting on circumstances surrounding these issues, my opinion and - as described later in this account, the perspective of others who witnessed our interactions - is that Allison's version of events, as well as her understanding of her verbal agreement with ICA does not accurately represent what transpired. Nonetheless, I feel that both I - and ICA as a whole - have acted rationally, responsibly, and appropriately in addressing the situation. Further, that we have acted in a way that is in keeping with company protocols developed in context of both U.S. and Italian labor law.

Repeatedly in her complaint to EOP, Allison makes the assertion that she was held in "dangerous" conditions, denied food, and treated unfairly. These allegations are not true.

In fact, Allison resided at the ICARTS for more than a week without mention of ever feeling unsafe,

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and in fact, expressed satisfaction with the facility and the beauty of the village and its vista's.

Considering the condition of our facility, it should be noted that other visitors have not shared Allison's assessment. In fact, I have in my posession a letter from Mark Buyck, chair of the Board of Trustees at USC who was quite literally, the last person in the building before we closed in late August 2015. After his visit, Mark Buyck wrote a letter to me, on which he copied USC President, Harris Pastides, describing the facility as a tremendous asset to the university." Between Mark Buyck's visit and the time the facility opened for the USC group in May of 2016 (about a week after Allison's stay) the facility was closed and was locked up securely. The possibility that the facility should deteriorate to a "dangerous" level securely locked up and unused, seems implausible and in fact, was not the case. Further, to my knowledge, none of the participants in the USC in Italy group arriving about a week after Alison's departure felt the facility was dangerous or not well maintained. Allison description of the mattress she slept on as so saturated with cat urine that when she returned home she had to throw away her sheets seems to me a clear fabrication. In fact, at the close of the 2015 season, all bedding and towels were removed by our linen service and the sheets Allison used while she was here were ones that I lent her from my own house and they were left by her on the bed in a wad when she left the building. The mattresses she used were the same ones utilized by Allen Miller during his stay in Monte Castello and were subsequently used by USC students occupying the same room just a week after Allison departed. To my knowledge no one in that group complained about the level of saturation of cat urine in mattresses.

During her stay, Allison was provided with 3 quite generous meals per day, prepared by myself and our other assistance in residence in that period. During that time, Allison never mentioned a lack of food or dissatisfaction with what she was provided.

Regarding her treatment, during the time proceeding the incident returning from Rome, Allison never complained about her work-load or about being treated unfairly, although our assistant, Alexandra Miller spoke to her a couple times regarding her pace and lack of participation in preparing group meals and subsequent clean up. Along these lines, while she indicates in her complaint that she did not anticipate the type of work she was ultimately expected to do in Monte Castello (or the duration of it), Allison did not complain about these issues to me. In her complaint to USC she describes anticipating light cleaning and other such duties and makes the assertion that ultimately the work load was much more demanding. Later in her narrative however, when she describes the specific activities she took part in, she ultimately describes activities that would clearly fall within the category of cleaning and painting and were the exact activities I described to her before she departed the US.

Allison makes the complaint that she was required to sleep in temperatures below 40 degrees F. This is not accurate. Allison's visit occurred in the second week of May, when temperatures in central Italy seldom fall below the 50's and 60's.

In terms of background to the situation, I should point out first that it has long been a tradition with the art school in Monte Castello to provide working scholarships for students as a means of helping talented students from less affluent families study in Italy. As I expressed to you numerous times, coming myself from a family of limited means and thus unable to study abroad, this is a particular mission of mine. However, this is also a common practice among artist residencies around the world

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and I invite you to search Artist Residences in Italy and you will soon find among the many options: working scholarships. At ICA, we will provide six of these opportunities for students from diverse institutions and for varying periods of time in the course of the summer. Despite our objective at ICA to provide opportunities to disadvantaged students however, common sense would dictate that as an employer and business-person, I must also be vigilant to the needs of our company and coordinate things in an effective manner. This includes notifying employees if their performance is sub-standard. I believe this is not only entirely reasonable, but expected.

Regarding the current situation with USC students: ICA offered working scholarships to 3 students from USC: two graduate students and one undergraduate student. All three sought to participate in the USC in Italy program, however all were unable to find sufficient financial support for their endeavor. One student's need was so great in fact, (in contrast to his initiative) that we also elected to purchase his transatlantic plane ticket.

This spring, one of the USC students, Allison Dunavant, came to me complaining that as a graduate student, there were no sources of aid available to her through USC Study Abroad. As you recall, I referred her to you. Your advice (according to my recollection) was for Allison to seek funding through the department or college. With this in mind, I advised her to apply for CAS funding and assisted her in applying for a CAS scholarship for grad students. Together with my colleague, Andrew Graciano (whose input I encourage you to seek), coordinator of our grad program in SVAD at USC, I recommended her for the funding. Andrew also recommended her for another grant, for which I provided a letter of support to the college.

Ultimately, because I felt that these three were serious and committed students I met with them together in mid-March off-campus and I told them of the opportunities for work-study scholarships provided by ICA. In this case, their activities would be in preparation for the USC group on May 23.

The situation our company offered them was that in exchange for working five hours per day, five days per week, ICA would provide accommodations, meals, and studio space for them. I made it clear that during their off-time, they could travel at their own expense, but that sometimes they could also accompany me on errands to locations that could be of interest to them and to remain there (again returning at their own expense) on the week end, without reservation. At the time, we discussed the parameters of their duties and obligations at length., I will also point out that we had numerous meetings together after the groups arrival to confirm the implementation of this schedule in terms of daily events. I feel quite confident that after speaking with the rest of the group that they were clear on the parameters of the arrangement.

Upon the students arrival - and until Friday - all seemed to be going according to plan and all seemed satisfied. The group was assigned tasks around the building that included painting walls and cleaning as previously agreed. The work was not particularly strenuous and no one expressed complaints or indicated any health issues that would hinder the performance of their duties. Overall, the group was clearly enjoying the experience and were also producing artwork, which we discussed as a group. In the course of my own activities, I took them to visit museums in Perugia and Assisi, where we spoke together about masterpieces in the collections. Throughout their stay they had been provided meals, which we prepared communally, which we will continue to do until our kitchen opens on

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Thursday.

In the course of their stay thus far, I have met with the group frequently and discussed the workload and conditions (as we continue to do) and to plan future activities - all seemed agreeable that it was a fair arrangement and in keeping with our verbal agreement and their expectations. Allison was of course engaged in this discussion and expressed no reservations about the type of work she was assigned or the workload, nor did she at any time advise me of any health concerns that would impair her ability to work, or that could otherwise endanger others. Despite the fact that she voiced no objections to the work or workload to me directly, several students expressed to me that Allison told them that if I wanted certain work done (such as cleaning) I should do it myself. Following our Thursday meeting, two of the students came to me afterward expressing frustration that they felt Allison was not doing her share of work and placing additional burden on them to complete their tasks. Both expressed that were frustrated that Allison seemed to be spending a lot of time on the phone and that her work pace was erratic. I spoke to her about this and also advised my assistant, Alexandra to more closely monitor Allison's work progress and to assign appropriate tasks to what appeared to be in her abilities. Alexandra reported to me that while Allison was argumentative, she agreed to comply.

I became quite concerned about the situation developing in Monte Castello with her peers and spoke to Allison about her job performance in Monte Castello. In the course of our conversation, Allison agreed to apply herself, but was argumentative. Afterward, other students came to me in confidence and reported that she told them that she did not feel that she needed to acknowledge me as her supervisor and complained that she did not feel a need to do manual labor. This of course seemed strange to me, since I quite clearly explained the activities the group would engage in in exchange for their stay and no one felt this unreasonable.

On Friday Allison failed to show up to work, complaining of a headache. Allison then slept until lunch and then afterward spent the remainder of the day packing for the weekend trip to Rome while the other students worked. Allison appeared to be in good health and spirits at that time. The other students appeared quite agitated about the situation and complained. Consequently, I asked Alexandra to speak to Allison again when the group returned from their trip on Saturday.

On Friday afternoon, since I had business in Rome, I agreed to take the students to a suburban Rome location from which they could take a bus into the city. My colleagues, Eros, our general manager and Alexandra our staff manager, and I dropped them off at a central bus station where they could find transport to their hotel in Rome, where I had made a booking for them (Best Western Canada). Alex, Eros, and I walked with them to the bus stop to be sure they got on the correct bus. I provided them with a map and an itinerary for Rome and specific instructions on how to find their hotel as well as information regarding their return trip.

The group was instructed that upon arrival at the bus station at Rome Termini, they would enter the station and in passing through en route to their hotel, they would confirm their return schedule and email me the details. (In our departure conversation, we emphasized that they should check the return schedule because they would have to transfer trains on their return at the city of Terni, about 45 minutes drive from Monte Castello and the small train line to Monte Castello provided limited

service in the late night hours.) I told them quite specifically about ICA's policies regarding off-campus travel and they were clear that if they could not make their connection, they would remain in Terni overnight.

Nonetheless, they failed to check the schedule and did not look into the departure times of the connecting train until they reached Terni. As a result, the group was stranded at Terni on Saturday night. They informed me by phone that they had missed the train at approximately 8:00 PM. As per our discussion, I told them that they had two options:

1. Stay at a hotel in Terni and continue on the next day
2. Our driver could pick them up at Terni for €20 per person. (The payment is made directly to our driver, Carlo Innocenti and is a very reasonable rate.)

They decided to stay in Terni and continue on the next day. Later that night however, I received two emails from Allison that I found most inappropriate in tone and disrespectful. I have forwarded these messages to you. In summary, she indicated her frustration that I was not willing to pick them up in Terni after 9:00 PM (a 45minute drive each way, door to door. I calculate an additional 15 minutes on each end for loading and traffic and thus this represents a two – hour drive.) Allison appeared incensed that I refused to do so. In fact, she sent me a message that I felt to be quite sarcastic in tone, accompanied by driving maps and driving times (to show me how simply I might have gotten there to pick them up apparently). The fact that she failed to calculate the round-trip time is in my estimation significant. She also suggested that they might have taken a bus to the nearby town of Todi, which arrived at about 1:00 AM and that I should pick them up there when it arrived. I did not reply to the latter.

It came as a great surprise and concern to me that in the course of her correspondence on the above matter, Allison also revealed to me that she was an epileptic and subject to severe migraines. She had never expressed this to me before that point.

On Sunday, the group contacted me, indicating that they would arrive at the nearby Fratta Todina station at 2:00 PM. With this objective in mind, I drove to the station and waited for over an hour before I received a call on my cell indicating that they had again missed their train and that they would arrive at 4:00 PM. Since I had business in Perugia I drove there and returned to Fratta just after 4:00. Unfortunately, instead of waiting, Allison insisted on walking up the hill to Monte Castello (45 minutes in good weather). Regrettably, they did not contact me with this plan change and proceeded up the hill. At the train station meanwhile, I waited for over an hour before she became fatigued with her walk and insisted that the other students call me. Approximately half-way in their path up our mountain, I received a call from one of the students asking us to pick them up. Since we were at the nearby train station, we arrived quickly. Upon locating the group at the side of the road we pulled over and parked. I told the group that before proceeding further we needed to discuss the situation with their weekend travel and the fact that I had spent several hours driving around looking for them. Allison complained that they could not reach me by phone, and thus could not contact me. This is strange since my phone was working and I was receiving calls. My call log showed no missed calls or messages, nor did I receive any email correspondence from them, save Allison's

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emails of complaint I described earlier. The latter clearly had no difficulties finding me. All three students travelling together had working cell phones.

I spoke to the group (then gathered in a parking area on the roadside) firmly and clearly about the situation. No one present expressed concerns about my tone or language, although I was understandably angry at the situation. As their supervisor, I notified the group that before proceeding up the hill we needed to have a discussion about policies and about hotels. I also told Allison that her tone in the emails was unacceptable and that if she did not change her behavior that we had no recourse but to tell her to pack her bags and go to the hotel next door for the remainder of her stay. She became incensed at this and told me: "I am about to get mad!" She then stormed off and sat on the guardrail about 20 feet from where we were parked. Feeling concern for her safety and that of the group, I instructed the other students to get in the car. I got in the car as well and asked my assistant Alexandra to speak to her and convince her to get in the car and ride up to the village with us and to further inform Allison that she (Alexandra) would accompany her to the school while she packed her bags and then would accompany her to the hotel in order to make sure she was able to check in. We waited without moving the car for about twenty minutes while Alexandra spoke to her. Alex returned to the car to inform me that Alison was quite agitated and that she refused to get in the car. After waiting for another ten minutes while Alex spoke to her a friend from the village drove by and Alex asked him to drive Allison up to the village. Allison accepted and they drove together to Monte Castello.

Upon reaching Monte Castello, Alexandra accompanied Allison, attempting to calm her down. In the course of the next hour or so, Allison telephoned her mother while Alexandra was present and Allison's mother asked to speak to her as a representative of ICA. I did not witness this, however Alexandra reported to me that Allison's mother was hostile and raised her voice to a level at which it made it necessary for Alexandra to inform the mother that if she did not moderate her tone, she would terminate the call. In the course of her conversation, Alexandra attempted to assure the mother that everything was safe, but that given the situation however, that we were well within our rights to insist that Allison leave the premises and move to the hotel if she did not moderate her behavior.

Ultimately, Allison returned to the ICA premises assuring Alex that she would moderate her tone. Allison chose to remain in her room for the remainder of the night. We sent dinner for her to her room.

The next morning, I asked Allison to come to the office (while I was accompanied by our manager, Eros Tassi) and I attempted to explain our position and policies. Allison almost immediately became confrontational and indicated that she did not work for me and that regardless of what others thought the parameters of the situation to be, she did not share the perception that she should be required to do manual labor. She indicated that she did not feel comfortable talking to me and that she was going to her room. When my assistant Alexandra arrived, I asked her to speak to Allison and try to reason with her. However in going to her room, Alexandra reported that Allison refused to speak to her and had locked herself in her room. She remained in this situation for a couple hours. Out of concern with the situation, I contacted our attorney, Alex Bonta in order to get advice on how to address the situation within the parameters of Italian law. Alex advised me that if Allison refused

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to leave the room and was not responding, I should contact the local police and ask them to address the situation. This became unnecessary however when Allison came downstairs from her room.

After speaking with you on the phone, I informed Allison that I felt that the best situation for her would be to continue to stay in our facilities for the remainder of her trip, without the obligation to work. I advised her that she could take her meals at the hotel at her own expense. She seemed quite comfortable with the situation and returned to her room.

A short while later I received a phone call from you indicating that USC would book a ticket for Allison and that she had chosen to leave early. As you know we arranged a hotel room for her and provided transport the next morning. She arrived at FCO by 8 AM.

From: VOROS, DAVID
Sent: Friday, August 26, 2016 1:40 PM
To: WELLS, CARL
Cc: WHITE, HENRY; MILLER, ALLEN; info; Marco Laracca
Subject: Re: From Carl R. Wells

Carl

To clarify, I mentioned nothing in the below about confirming a meeting with you.

1. You again indicated that I failed to respond to a message from you. This is not accurate and I must point out that this is the second time that you indicated that I failed to respond to a message from you, when on fact I had responded.

Regarding your recent message, I indicated below that in fact I emailed you three times in response to your previous email and received no response from you

2. I said I would consult with my attorney regarding your request for a meeting in person with you and will notify you in this regard.

3. As I understand it, a meeting with my counsel constitutes a meeting with me. I will run this by my attorney and make sure I am correct in my understanding.

Thanks

DV

Sent from my iPhone

On Aug 26, 2016, at 1:24 PM, "WELLS, CARL" <WELLSCHR@mailbox.sc.edu> wrote:

Great! I look forward to meeting with you.

Sent from my Verizon Wireless 4G LTE smartphone

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Dunavant v. Voros

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

From: "VOROS, DAVID" <VOROS@mailbox.sc.edu>
 Date: 26/08/2016 1:17 PM (GMT-05:00)
 To: "WELLS, CARL" <WELLS@mailbox.sc.edu>
 Cc: "WHITE, HENRY" <HJWHITE@mailbox.sc.edu>, "MILLER, ALLEN"
 <MILLERPA@mailbox.sc.edu>, info <info@avvocati.us>
 Subject: Re: From Carl R. Wells

Carl

To date, I have contacted you by email regarding a phone interview at least 3 times. I copied Allen Miller and my attorney on these email correspondences. In fact however, I received no response to any of my emails from you. For the record, will re-send my dated email correspondence to you and copy the above. Regarding Monday I will be in contact after consulting my attorney.

DV

Sent from my iPhone

On Aug 26, 2016, at 12:54 PM, "WELLS, CARL" <WELLS@mailbox.sc.edu> wrote:

I have asked you to respond to a complaint filed against you by Alison Dunavant.

While you have asked me to send the information to your lawyer, at this point I must inform you that you are in violation of our policy by not responding. Please know that if you would like for your lawyer to meet with us when you respond that is fine; however, be aware that the meeting is with you. Legal counsel can attend and even advise you quietly, but our meeting is with you.

At this point, I must move forward with my investigation, with or without your participation. Please contact me immediately to schedule a meeting. If I have not heard from you by Monday of next week, I will move on with the investigation without you.

Carl R. Wells, PhD

Assistant Director, Office of Equal Opportunity Programs
 Deputy Title IX Coordinator

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 <image001.jpg>

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USC - 0297

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From: DUNAVANT, ALLISON R
To: WELLS, CARL
Subject: Dunavant v Voros
Date: Monday, August 29, 2016 5:35:58 PM

Dr. Wells,

May I have a copy of David Voros' response to the investigation and Notice of Harassment?
Thank you.

Allison R. Dunavant
Graduate Student
School of Visual Arts and Design
University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

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From: WELLS, CARL
To: DUNAVANT, ALLISON R
Subject: RE: Dunavant v Voros
Date: Monday, August 29, 2016 10:34:07 PM

I am meeting with him tomorrow at 11. I will contact you after I meet with him.

From: DUNAVANT, ALLISON R [dunavana@email.sc.edu]
Sent: Monday, August 29, 2016 5:35 PM
To: WELLS, CARL
Subject: Dunavant v Voros

Dr. Wells,

May I have a copy of David Voros' response to the investigation and Notice of Harassment?
Thank you.

Allison R. Dunavant

Graduate Student
School of Visual Arts and Design
University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

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From: DUNAVANT, ALLISON R
To: WELLS, CARL
Subject: Re: Dunavant v Voros
Date: Wednesday, August 31, 2016 4:36:51 PM

Carl Wells,

I wanted to send this email to document how the "accommodations" for my classes are going. The department overlooked my Independent study contract form, so I am still not registered for that....which was to be my replacement for David Voros' Life Drawing course that I was registered for. And, as it is now past the add/drop date, I'm not sure if I will be able to get that independent study course. I'm going to try to fill out a registration exception form and hope for the best. Honestly, this is something that you and the department should have handled.

Is a copy of David's response to the investigation now available?

Allison R. Dunavant

Graduate Student
 School of Visual Arts and Design
 University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

From: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Sent: Monday, August 29, 2016 9:34:07 PM
To: DUNAVANT, ALLISON R
Subject: RE: Dunavant v Voros

I am meeting with him tomorrow at 11. I will contact you after I meet with him.

From: DUNAVANT, ALLISON R [dunavanta@email.sc.edu]
Sent: Monday, August 29, 2016 5:35 PM
To: WELLS, CARL
Subject: Dunavant v Voros

Dr. Wells,

May I have a copy of David Voros' response to the investigation and Notice of Harassment?
 Thank you.

Allison R. Dunavant

Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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Dunavant v. Voros

"Art is not what you see but what you make others see." -Edgar Degas

USC - 0301

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Office of Equal Opportunity Programs

CONFIDENTIAL

Dunavant v. Voros

From: WELLS, CARL
To: "DUNAVANT, ALLISON R"
Subject: RE: Dunavant v Voros
Date: Thursday, September 01, 2016 10:31:00 AM

I will forward this to your Department and press upon the need to ensure that this happens. I will let you know what they say.

From: DUNAVANT, ALLISON R [mailto:dunavana@email.sc.edu]
Sent: Wednesday, August 31, 2016 4:37 PM
To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Subject: Re: Dunavant v Voros

Carl Wells,

I wanted to send this email to document how the "accommodations" for my classes are going. The department overlooked my Independent study contract form, so I am still not registered for that....which was to be my replacement for David Voros' Life Drawing course that I was registered for. And, as it is now past the add/drop date, I'm not sure if I will be able to get that independent study course. I'm going to try to fill out a registration exception form and hope for the best. Honestly, this is something that you and the department should have handled.

Is a copy of David's response to the investigation now available?

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

From: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Sent: Monday, August 29, 2016 9:34:07 PM
To: DUNAVANT, ALLISON R
Subject: RE: Dunavant v Voros

I am meeting with him tomorrow at 11. I will contact you after I meet with him.

From: DUNAVANT, ALLISON R [dunavana@email.sc.edu]
Sent: Monday, August 29, 2016 5:35 PM
To: WELLS, CARL
Subject: Dunavant v Voros

Dr. Wells,

CONFIDENTIAL

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Office of Equal Opportunity Programs

Dunavant v. Voros

May I have a copy of David Voros' response to the investigation and Notice of Harassment?
Thank you.

Allison R. Dunavant

Graduate Student

School of Visual Arts and Design

University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

USC - 0303

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

From: WELLS, CARL
To: GRACIANO, ANDREW
Subject: FW: Dunavant v Voros
Date: Thursday, September 01, 2016 10:32:00 AM

Can you tell me the status of this. I hope that Allison can still register for the class.

THANKS!

From: DUNAVANT, ALLISON R [mailto:dunavana@email.sc.edu]
Sent: Wednesday, August 31, 2016 4:37 PM
To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Subject: Re: Dunavant v Voros

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Subject: Dunavant v Voros

Dr. Wells,

CONFIDENTIAL

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Office of Equal Opportunity Programs

Dunavant v. Voros

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Thank you.

Allison R. Dunavant

Graduate Student

School of Visual Arts and Design

University of South Carolina

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USC - 0305

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

From: GRACIANO, ANDREW
To: WELLS, CARL
Cc: CHAMETZKY, PETER
Subject: RE: Dunavant v Voros
Date: Thursday, September 01, 2016 10:55:16 AM

Dear Carl,

I received the Independent Study form from Allison Dunavant with her signature and Jaime Misenheimer's signatures on it; however, it was the undergraduate form. The Grad School has their own graduate form. So I transferred all the information by hand to the graduate form, signed it, and placed it in Allison's mailbox. Some days later I received it from Jaime Misenheimer with the signatures complete. I then handed it off to Evelyn Wong, our Graduate Coordinator. Rebecca Boyd, who handles course scheduling in SVAD, has to create an IS section for Misenheimer, which she will do (or has already done); but yes, we are now beyond the drop/add date. Evelyn is contacting the Grad School to facilitate the course change, ideally without penalty (fee).

The completion of the Independent Study form was delayed by two things: The CAS sat on my G-TAN nomination form for Jaime Misenheimer (who is an adjunct professor) to be considered 'graduate faculty' for nearly a month—due, no doubt, to the change in administration and the hiring of new Associate Deans. So, bad timing. And Allison filled out the wrong form to begin with.

SVAD (Evelyn, Rebecca, Jaime and myself) has done everything possible to make this happen as quickly and painlessly as possible. How you are supposed to do anything regarding the adding/dropping of courses is beyond me.

To my face and in email correspondence, Allison Dunavant is very gracious and respectful, even when venting some anger about situations and certain faculty members; however, it appears from her email to you that her persona is two-faced and disappointingly disrespectful to you and your office. I will continue to work to ameliorate her situation as best I can nevertheless. But be mindful that her attitude is poor and her tendency to blame everyone but herself is telling.

All best,
 Andrew Graciano

Andrew Graciano, PhD
 Associate Professor of Art History

Associate Director and Director of Graduate Studies
 School of Visual Art & Design
 University of South Carolina
 Columbia, SC 29208 USA
 +1(803) 777-4236

<https://www.routledge.com/Exhibiting-Outside-the-Academy-Salon-and-Biennial-1775-1999-Alternative/Graciano/p/book/9781472428271>

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

From: WELLS, CARL
Sent: Thursday, September 01, 2016 10:32 AM
To: GRACIANO, ANDREW <GRACIANO@mailbox.sc.edu>
Subject: FW: Dunavant v Voros

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Subject: RE: Dunavant v Voros

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From: DUNAVANT, ALLISON R [dunavana@email.sc.edu]
Sent: Monday, August 29, 2016 5:35 PM
To: WELLS, CARL

CONFIDENTIAL

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Office of Equal Opportunity Programs

Dunavant v. Voros

Subject: Dunavant v Voros

Dr. Wells,

May I have a copy of David Voros' response to the investigation and Notice of Harassment?
Thank you.

Allison R. Dunavant

Graduate Student

School of Visual Arts and Design

University of South Carolina

"Art is not what you see but what you make others see." -Edgar Degas

USC - 0308

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Office of Equal Opportunity Programs

CONFIDENTIAL

Dunavant v. Voros

From: WELLS, CARL
To: "DUNAVANT, ALLISON R"
Subject: RE: Dunavant v Voros
Date: Thursday, September 01, 2016 10:57:00 AM

I just conferred with your Department, while the process is held up, the course approval will happen without penalty to you. For questions, touch bases with Andrew Graciano.

Thanks!

From: DUNAVANT, ALLISON R [mailto:dunavana@email.sc.edu]
Sent: Wednesday, August 31, 2016 4:37 PM
To: WELLS, CARL <WELLSCR@mailbox.sc.edu>
Subject: Re: Dunavant v Voros

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Subject: Dunavant v Voros

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Office of Equal Opportunity Programs

Dunavant v. Voros

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Allison R. Dunavant

Graduate Student
School of Visual Arts and Design
University of South Carolina

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USC - 0310

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

From: Allison Dunavant
To: WELLS, CARL
Cc: GIST, BOBBY
Subject: Title IX Complaint Dunavant v Voros
Date: Tuesday, September 13, 2016 7:14:42 PM

Dr. Wells,

It has been over 3 months since I filed a Title IX complaint with the EOP office, and since I was interviewed by you regarding my statement against David Voros. This was at the beginning of June. It is now mid September. I submitted this complaint and have acted, within accordance and obedience of all Title IX procedures. I have done everything that was proper and asked of me in order to go through with this process. I expected you and the EOP office to do the same; to follow it's own procedures with the utmost timeliness and appropriate concern. An investigation should have been completed. Not a mediation. This was and is a serious concern; upon receiving said "mediation/resolution" I once again asked that the investigation that had already begun, be completed. I asked that Title IX procedures be followed. I asked for a copy of David Voros' response.

Instead, I have been ignored by you and the EOP office. And if not ignored, then treated without the respect that the severity of my situation and complaint has called for. I have to go to class every day with worry of whether I will run into David Voros; I use the restroom on different floors to avoid passing his office; I park my car and enter the building at different locations for fear of crossing his path; I changed my GIA to avoid working with his wife because of the potential conflict and stress it would create. I've accommodated myself in light of the University taking no action. While this is no concern for you, it is a daily concern for me and potentially for the wellbeing of other students . With this in mind, I would, again, like to make record of my request for the following:

1. A dated copy of David Voros' response to the notice of harassment and to the investigation.
2. A copy of the EOP's decision/findings for my case.
3. Notification of what, if any, actions will be taken.

Thank you,

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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Office of Equal Opportunity Programs

CONFIDENTIAL
Dunavant v. Voros

From: WELLS, CARL
To: Allison Dunavant
Cc: GIST, BOBBY
Subject: RE: Title IX Complaint Dunavant v Voros
Date: Tuesday, September 13, 2016 7:32:15 PM

We have finished our investigation and would like to meet with you to discuss our findings. Let me know when you are available.

Sent from my Verizon Wireless 4G LTE smartphone

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

From: Allison Dunavant <dunavanta@email.sc.edu>
 Date: 13/09/2016 7:14 PM (GMT-05:00)
 To: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>
 Cc: "GIST, BOBBY" <BGIST@mailbox.sc.edu>
 Subject: Title IX Complaint Dunavant v Voros

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Office of Equal Opportunity Programs

Dunavant v. Voros

Thank you,

Allison R. Dunavant
Graduate Student
School of Visual Arts and Design
University of South Carolina

USC - 0313

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Office of Equal Opportunity Programs

CONFIDENTIAL

Dunavant v. Voros

From: [Allison Dunavant](#)
To: [WELLS, CARL](#)
Cc: [GIST, BOBBY](#)
Subject: RE: Title IX Complaint Dunavant v Voros
Date: Tuesday, September 13, 2016 8:41:32 PM

Dr. Wells,

I would be happy to meet with you. However I request that I first receive documentation of these findings. Please email me a copy so that I can review it prior to meeting. Also, I still require a copy of David Voros' response to the investigation and reprimand for his tardiness in complying with the investigation process. You said I could have these things after you met with him, which occurred a few weeks ago. When I have these things to review, we can set up a time to meet.

Thank you,

Allison R. Dunavant
 Graduate Student
 School of Visual Arts and Design
 University of South Carolina

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

From: "WELLS, CARL" <WELLSCR@mailbox.sc.edu>
 Date: 9/13/16 7:32 PM (GMT-05:00)
 To: Allison Dunavant <dunavana@email.sc.edu>
 Cc: "GIST, BOBBY" <BGIST@mailbox.sc.edu>
 Subject: RE: Title IX Complaint Dunavant v Voros

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Sent from my Verizon Wireless 4G LTE smartphone

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Office of Equal Opportunity Programs

Dunavant v. Voros

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Thank you,

Allison R. Dunavant
Graduate Student
School of Visual Arts and Design
University of South Carolina

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Office of Equal Opportunity Programs

CONFIDENTIAL

Dunavant v. Voros

From: HANN, BRIAN
To: WELLS, CARL
Subject: RE: Correspondence for Case (Allison Dunavant)
Date: Friday, September 16, 2016 9:53:49 AM

Carl,
Per our discussion:

The listing of agencies and/or study abroad opportunities in this document is offered solely as information to University of South Carolina (USC) students, faculty, and staff. USC cannot guarantee the completeness or accuracy of such information. Inclusion of any agency and/or study abroad opportunity in this document does not constitute, and shall not be construed or reported as (1) an endorsement or approval by USC of the agency, or its business practices, or (2) a warranty or representation by USC as to the quality, safety or other features of such agency and/or its owners or employees. USC expressly disclaims any and all responsibility for any problems that may arise with regard to such agencies and/or study abroad opportunities with regard to disputes between agencies and students. All prospective students must exercise their own due diligence and good judgment when evaluating a prospective agency and/or study abroad opportunity.

Thanks!
Brian

-----Original Message-----

From: Carl R. Wells [mailto:wellscr@mailbox.sc.edu]
Sent: Thursday, September 15, 2016 1:57 PM
To: HANN, BRIAN <HANN@mailbox.sc.edu>
Subject: Correspondence for Case (Allison Dunavant)

You have been carbon copied on a letter for case 2015021301 (Allison Dunavant).
Please review the PDF attachment and retain a copy for your files. If you encounter difficulty opening this file, please contact our office.

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Office of Equal Opportunity Programs

Dunavant v. Voros



UNIVERSITY OF
SOUTH CAROLINA

EOP CASE #2015021301

Other Documents

USC - 0318

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2015021301Office of Equal Opportunity Programs
Bullying

Dunavant v. Voros

Allison Renee Dunavant (S73289893)**DEMOGRAPHIC INFORMATION**

DOB	Classification	Athletics	
[REDACTED]	Graduate	Not Athlete	
Gender	Major	Greek	
Female	Art Studio	Not Greek	
Ethnicity	Academic Advisor	Honors	
Not Hispanic or Latino;WH	GPA Last Term 0.000	Cume 3.833	Not Honors
		ROTC/Veteran	
		Not Veteran	

CONTACT INFORMATIONHousing Address
Off Campus

Permanent Address

Email Address
dunavana@email.sc.eduEmergency Contact:
Eileen Dunavant**INCIDENT AND CASE INFORMATION**Role
SurvivorIncident Date
2016-05-01Incident Time
1:00 pmIncident Location
Other (please specify in specific location box)Reported Date
2016-05-16Referral Source
OtherReported By
Dale Moore

Charges/Issues

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

Clergy Reportability

Tags

Case Status
OpenAccess Restriction
EOPCase Created Date
2016-05-23Case Created By
Carl R. WellsAssigned To
Carl R. Wells (Asst. Dir. - EOP)Next Deadline Date
2016-05-23Reason
Appt. date from case creation

The information contained on these pages is privileged and confidential information intended solely for the individual or entity who has accessed it for official purposes and by lawful means. Any dissemination, distribution, or copy of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone at 803.777.3854, and return the original message to us via the U.S. Postal Service to the Office of Equal Opportunity Programs, University of South Carolina, 1500 Hampton Street, 105, Columbia, SC 29208, without retaining a copy.

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Office of Equal Opportunity Programs

Dunavant v. Voros

INCIDENT DESCRIPTION

* Please provide a detailed description of the incident(s) you are reporting.
Ilene Dunavant, mother of Allision Dunavant, MFA student, called at about 10:AM on 5/16 to discuss her concerns about her daughter's living and work conditions and ask for help in helping remove her from what she described as dangerous and unacceptable living, working, and travel conditions. She cited numerous email communications from her daughter complaining about her treatment while participating in a "USC-sanctioned Study Abroad" experience. She talked about unreasonable unsafe living and working conditions, improperly supervised travel excursions, food deprivation as punishment for laziness, ostracization, and abusive language. These allegations were made against her host and employer, David Voros, USC Associate Professor in Studio Art, "owner" of the USC in Monte Castelio school in Montecastello de Vibio, Italy. She feared for her daughter's safety and emotional well-being and seemed desperate for USC to intervene. She also shared her daughter's concerns that complaints and plea for help could lead to academic retaliation. Her concerns had been reported to our Campus Police, Office of Study Abroad, and the Office of the Provost.

* Type of Interpersonal Violence
Harassment

* Survivor has been advised of the following resources (check all that apply):
USC Police Department, On Campus Counseling, Title IX Office, Off-campus resources (including counseling and support services)

* Does the assaulted person plan to contact law enforcement?
Unknown

* Does the assaulted person plan to seek university disciplinary action?
Unknown

* The assaulted person has been informed that they will be contacted by the Title IX staff?
No

* Does the assaulted person want to receive a no contact order?
Unknown

* Were alcohol and/or drugs involved in the incident?
Unknown

* Does the assaulted person believe they were drugged?
Unknown

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2015021301 Open
No Photo Title IX, Harassment
Available

Allison Renee Dunavant (S73289893)

DEMOGRAPHICS

DOB [REDACTED]	Athletics Not Athlete
Gender Female	Greek Not Greek
Ethnicity Not Hispanic or Latino;WH	Honors Not Honors
Classification Graduate	ROTC / Veteran Not Veteran
Major Art Studio	
Academic Advisor	

GPA Last Term / GPA Cumulative
0.000 / 3.833

CONTACT INFORMATION

Housing Off Campus	Local [REDACTED]	Permanent [REDACTED]
Username dunavana	[REDACTED]	[REDACTED]
Email Address dunavana@email.sc.edu		
Emergency Contact Eileen Dunavant		

INCIDENT AND CASE INFORMATION

Report Number	Role Survivor	
Incident Date 2016-05-01	Incident Time 1:00 pm	Incident Location Other (please specify in specific location box) Montecastello de Vibio, Italy
Reported Date 2016-05-16	Referral Source Other	Reported By Dale Moore DM@mailbox.sc.edu
Case Created Date 2016-05-23	Assigned To Carl R. Wells (Asst. Dir. - EOP)	Home Office Office of Equal Opportunity Programs
Access Restriction		

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Clery Reportability

Office of Equal Opportunity Programs

Dunavant v. Voros

Tags
Study AbroadNext Deadline Date
2016-05-23Reason
Appt. date from case creation**Incident Summary**

The Complainant alleges that during the course of International trip sponsored and coordinated by the Respondent, she was subjected to gender harassment and bullying by the Respondent.

Incident Description

* Please provide a detailed description of the incident(s) you are reporting.
 Ilene Dunavant, mother of Allision Dunavant, MFA student, called at about 10:AM on 5/16 to discuss her concerns about her daughter's living and work conditions and ask for help in helping remove her from what she described as dangerous and unacceptable living, working, and travel conditions. She cited numerous email communications from her daughter complaining about her treatment while participating in a "USC-sanctioned Study Abroad" experience. She talked about unreasonable unsafe living and working conditions, improperly supervised travel excursions, food deprivation as punishment for laziness, ostracization, and abusive language. These allegations were made against her host and employer, David Voros, USC Associate Professor in Studio Art, "owner" of the USC in Monte Castello school in Montecastello de Vibio, Italy. She feared for her daughter's safety and emotional well-being and seemed desperate for USC to intervene. She also shared her daughter's concerns that complaints and plea for help could lead to academic retaliation. Her concerns had been reported to our Campus Police, Office of Study Abroad, and the Office of the Provost.

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* Does the assaulted person plan to seek university disciplinary action?
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* The assaulted person has been informed that they will be contacted by the Title IX staff?
 No

* Does the assaulted person want to receive a no contact order?
 Unknown

* Were alcohol and/or drugs involved in the incident?
 Unknown

* Does the assaulted person believe they were drugged?
 Unknown

RESOLUTION INFORMATION**Charges/Issues**

1) Gender (Title IX) Harassment

Findings (if applicable)

FYI

Appt. Date
2016-05-23**Appt. Time****Appt. Location****Hearing/Resolution Date**
2016-05-23**Hearing/Resolution Type**
Did not open a case**Hearing Officer(s)**
Asst. Dir. - EOP ()

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Parental Notification
NoOffice of Equal Opportunity Programs
Holds In PlaceDunavant v. Voros
Appeal Status
No appeal filed**Rationale**

Did not open a case because after details of incidents were discovered, EOP determined there was no protected class violation; case was referred to Office of the Provost.

CC List**SANCTIONS / ACTIONS**

✓ = completed, ✘ = incomplete, → = referred to another case

No sanctions/actions listed

NOTES**General Notes**

5/19/2016 CRW

Received a detailed account of the incident from the Provost's Office. Sent email to Provost's Office suggesting that based upon the information we received, there was no EOP or discrimination issue, but referred the matter to the Provost's Office for followup. The Provost's agreed. Email was sent to:

Paul Allen Miller
Vice Provost, Director of International Affairs
Carolina Distinguished Professor of Classics and

6/24/2016 CRW

Met with Alison Dunavant to discuss her case. Dunavant recorded the meeting. EOP request a copy of the recording. Kevin Sheppard sat in on the meeting. Informed Dunavant that Voros would receive a Notice of Charge today. Also apprised Dunavant of the University's zero tolerance for retaliation and asked her to contact immediately if she was subjected to retaliation.

ELECTRONIC FILE CABINET

Doc ID	Filename	Date Modified	File Size	Associated with
00003776	IR	May 23, 2016 10:12 am	7.88kb	All parties
00003777	Case Creation Sheet	May 23, 2016 10:12 am	10.19kb	This individual
00003779	Re_Events In Monte Castello.pdf	May 23, 2016 10:17 am	23.11kb	All parties
00003780	Re_Events In Monte Castello2.pdf	May 23, 2016 10:17 am	24.07kb	All parties
00003997	Emails.pdf	June 13, 2016 10:16 am	4.40MB	All parties
00003996	Dunavant_Statement.pdf	June 13, 2016 10:16 am	4.94MB	All parties
00003998	Letter_From_Britain_Law_Firm.pdf	June 13, 2016 10:16 am	2.36MB	All parties
00004013	ComplaintReceipt>Email)	June 17, 2016 9:18 am	100.47kb	This individual
00004045	ChargeInformalComplainantLtr>Email)	June 24, 2016 10:47 am	100.85kb	This individual
00004165	CustomLetter>Email)	July 21, 2016 3:04 pm	100.28kb	This individual
00004179	CustomLetter>Email)	July 22, 2016 3:55 pm	45.72kb	This individual
00004977	Notes from Meeting David Voros.docx	September 13, 2016 12:36 pm	12.07kb	All parties
00004976	IR.pdf	September 13, 2016 12:36 pm	7.88kb	All parties
00004975	Email_From_Lauren_Greenwald.pdf	September 13, 2016 12:36 pm	14.36kb	All parties
00004978	Picture.pdf	September 13, 2016 12:36 pm	17.73MB	All parties
00004979	Re_Events in Monte Castello.pdf	September 13, 2016 12:36 pm	23.11kb	All parties
00004980	Re_Events in Monte Castello2.pdf	September 13, 2016 12:36 pm	24.07kb	All parties
00004981	Resolution Explanation.pdf	September 13, 2016 12:36 pm	101.07kb	All parties
00004985	IR.pdf	September 13, 2016 12:36 pm	7.88kb	All parties
00004984	Email_From_Lauren_Greenwald.pdf	September 13, 2016 12:36 pm	14.36kb	All parties
00004983	Second_Letter.pdf	September 13, 2016 12:36 pm	5.15MB	All parties
00004982	Second Letter to Voros.htm	September 13, 2016 12:36 pm	2.54kb	All parties
00004987	Picture.pdf	September 13, 2016 12:36 pm	17.73MB	All parties
00004986	Notes from Meeting David Voros.docx	September 13, 2016 12:36 pm	12.07kb	All parties
00004992	Second_Letter.pdf	September 13, 2016 12:36 pm	5.15MB	All parties
00004991	Second Letter to Voros.htm	September 13, 2016 12:36 pm	2.54kb	All parties
00004990	Resolution Explanation.pdf	September 13, 2016 12:36 pm	101.07kb	All parties
00004989	Re_Events In Monte Castello2.pdf	September 13, 2016 12:36 pm	24.07kb	All parties
00004988	Re_Events In Monte Castello.pdf	September 13, 2016 12:36 pm	23.11kb	All parties
00004993	Voros Statement.pdf	September 13, 2016 1:03 pm	65.13kb	All parties

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00004994	Statement.pdf	September 13, 2016 1:03 pm 38.30kb All parties
00004995	Statement.pdf	September 13, 2016 1:03 pm 37.06kb All parties
00004996	Alexandra Stasko Statement.pdf	September 13, 2016 1:03 pm 14.56kb All parties

AUDIT TRAIL

2016-05-23	10:12:45	Carl R. Wells	Case created File: IR added (#00000529 from web)
2016-05-23	10:12:46	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-05-23	10:14:58	Carl R. Wells	Case record accessed on CRF screen
2016-05-23	10:15:23	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-05-23	10:15:32	Carl R. Wells	Document #00003770 Re_Events in Monte Castello.pdf added for entire case
2016-05-23	10:17:18	Carl R. Wells	Document #00003780 Re_Events in Monte Castello2.pdf added for entire case
2016-05-23	10:17:18	Carl R. Wells	Database entry updated. HEARING_DATE changed from (no value set) to 2016-05-23, HEARING_TYPE changed from (no value set) to Did not open a case, HEARING_OFFICER_1 changed from (no value set) to Asst. Dir. - EOP, CHARGE_1 changed from (no value set) to Bullying, FINDING_1 changed from (no value set) to FYI, RATIONALE changed from (no value set) to Did not open a case because after details of incidents were discovered, EOP determined there was no protected class violation; case was referred to Office of the Provost.
2016-05-23	10:18:08	Carl R. Wells	CRF status changed to approved
2016-05-23	10:18:11	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-05-23	10:18:22	Carl R. Wells	Database entry updated. STATUS changed from Open to Closed
2016-05-23	10:18:26	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-05-26	14:14:21	Carl R. Wells	Summary case record viewed on Find Case screen
2016-05-26	14:14:23	Carl R. Wells	Summary case record viewed on Find Priors screen
2016-05-26	14:14:25	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-05-26	14:14:34	Carl R. Wells	Database entry updated. Study Abroad tag added
2016-06-13	09:21:25	Carl R. Wells	Summary case record viewed on Find Case screen
2016-06-13	09:23:30	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-06-13	09:28:45	Carl R. Wells	Database entry updated. NOTES_FILE_HISTORY updated
2016-06-13	10:15:41	Carl R. Wells	Summary case record viewed on Find Case screen
2016-06-13	10:15:47	Carl R. Wells	Summary case record viewed on Find Priors screen
2016-06-13	10:15:49	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-06-13	10:16:24	Carl R. Wells	Document #00003996 Dunavant_Statement.pdf added for entire case
2016-06-13	10:16:25	Carl R. Wells	Document #00003907 Emails.pdf added for entire case
2016-06-13	10:16:25	Carl R. Wells	Document #00003998 Letter_From_Brittain_Law_Firm.pdf added for entire case
2016-06-13	11:22:17	Henry White	Summary case record viewed on Find Case screen
2016-06-13	11:22:40	Henry White	Summary case record viewed on Find Case screen
2016-06-14	16:33:15	Henry White	Summary case record viewed on Find Case screen
2016-06-15	07:48:19	Henry White	Summary case record viewed on Find Case screen
2016-06-17	09:11:10	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-06-17	08:11:23	Carl R. Wells	Database entry updated. STATUS changed from Closed to Open
2016-06-17	09:18:58	Carl R. Wells	Receipt of Complaint (Document #00004013) letter sent via email to (dunavana@email.sc.edu)
2016-06-17	09:59:00	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-06-17	10:07:17		Email link clicked for 2015021301ComplaintReceipt.pdf (Document #00004013) from IP address 24.168.224.127. User agent: Mozilla/5.0 (Linux; Android 6.0.1; SAMSUNG-SM-G920A Build/MMB29K) AppleWebKit/537.36 (KHTML, like Gecko) SamsungBrowser/4.0 Chrome/44.0.2403.133 Mobile Safari/537.36
2016-06-17	10:07:35		Email link clicked for 2015021301ComplaintReceipt.pdf (Document #00004013) from IP address 24.168.224.127. User agent: Mozilla/5.0 (Windows NT 10.0; WOW64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/51.0.2704.84 Safari/537.36
2016-06-22	10:13:01		Successful viewing of 2015021301ComplaintReceipt.pdf (Document #00004013) from IP address 24.168.224.127. User agent: Mozilla/5.0 (Windows NT 10.0; WOW64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/51.0.2704.84 Safari/537.36
2016-06-22	10:13:09		Email link clicked for 2015021301ComplaintReceipt.pdf (Document #00004013) from IP address 24.168.224.127. User agent: Mozilla/5.0 (Windows NT 10.0; WOW64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/51.0.2704.103 Safari/537.36
2016-06-24	09:54:57	Carl R. Wells	Successful viewing of 2015021301ComplaintReceipt.pdf (Document #00004013) from IP address 24.168.224.127. User agent: Mozilla/5.0 (Windows NT 10.0; WOW64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/51.0.2704.103 Safari/537.36
2016-06-24	10:47:42	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-06-24	10:47:42	Carl R. Wells	Notice of Charge Letter to Complainant (Document #00004045) letter sent via email to (dunavana@email.sc.edu)
2016-06-24	10:47:42	Carl R. Wells	Notice of Charge Letter to Complainant - CCs distributed via email to gabelj@mailbox.sc.edu, Bglst@mail box.sc.edu, rhawyer@mail box.sc.edu
2016-06-24	10:47:54	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-06-24	10:53:35	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-06-24	10:55:30	Carl R. Wells	Database entry updated. NOTES_FILE_HISTORY updated
2016-06-24	13:19:26		Email link clicked for 2015021301ChargeInformalComplainantLtr.pdf (Document #00004045) from IP address 107.77.232.182. User agent: Mozilla/5.0 (Linux; Android 6.0.1; SAMSUNG-SM-G920A Build/MMB29K) AppleWebKit/537.36 (KHTML, like Gecko) SamsungBrowser/4.0 Chrome/44.0.2403.133 Mobile Safari/537.36
2016-06-24	13:19:51		Successful viewing of 2015021301ChargeInformalComplainantLtr.pdf (Document #00004045) from IP address 107.77.232.182. User agent: Mozilla/5.0 (Linux; Android 6.0.1; SAMSUNG-SM-G920A Build/MMB29K) AppleWebKit/537.36 (KHTML, like Gecko) SamsungBrowser/4.0 Chrome/44.0.2403.133 Mobile Safari/537.36

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		Office of Equal Opportunity Programs	Dunavant v. Voros
2016-06-24	13:19:52	#00004045) from IP address 107.77.232.182. User agent: Mozilla/5.0 (Linux; Android 6.0.1; SAMSUNG-SM-G920A Build/MMB29K) AppleWebKit/537.36 (KHTML, like Gecko) SamsungBrowser/4.0 Chrome/44.0.2403.133 Mobile Safari/537.36	
2016-06-24	14:13:24	Successful viewing of 2015021301ChargeInformalComplainantLtr.pdf (Document #00004045) from IP address 107.77.232.182. User agent: Mozilla/5.0 (Linux; Android 6.0.1; SAMSUNG-SM-G920A Build/MMB29K) AppleWebKit/537.36 (KHTML, like Gecko) SamsungBrowser/4.0 Chrome/44.0.2403.133 Mobile Safari/537.36	
2016-06-24	14:14:03	Email link clicked for 2015021301ChargeInformalComplainantLtr.pdf (Document #00004045) from IP address 172.75.228.4. User agent: Mozilla/5.0 (X11; CrOS armv7l 7834.70.0) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/49.0.2623.112 Safari/537.36	
2016-07-21	15:04:42	Carl R. Wells	Successful viewing of 2015021301ChargeInformalComplainantLtr.pdf (Document #00004045) from IP address 172.75.228.4. User agent: Mozilla/5.0 (X11; CrOS armv7l 7834.70.0) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/49.0.2623.112 Safari/537.36
2016-07-21	15:04:42	Carl R. Wells	Blank customizable letter - CCs distributed via email to hjwhite@mailbox.sc.edu
2016-07-21	15:04:58	Carl R. Wells	Blank customizable letter (Document #00004165) letter sent via email to (dunavana@email.sc.edu)
2016-07-21	15:17:06		Case record accessed on Update Existing Case screen
2016-07-21	15:17:12		Email link clicked for 2015021301CustomLetter.pdf (Document #00004165) from IP address 23.120.168.67. User agent: Mozilla/5.0 (Windows NT 10.0; WOW64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/51.0.2704.103 Safari/537.36
2016-07-21	15:19:42	Carl R. Wells	Successful viewing of 2015021301CustomLetter.pdf (Document #00004165) from IP address 23.120.168.67. User agent: Mozilla/5.0 (Windows NT 10.0; WOW64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/51.0.2704.103 Safari/537.36
2016-07-22	15:55:32	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-07-22	15:55:32	Carl R. Wells	Blank customizable letter - CCs distributed via email to hjwhite@mailbox.sc.edu, gabe.j@mailbox.sc.edu, CHAMETZK@mailbox.sc.edu, GRACIANO@mailbox.sc.edu, MILLERPA@mailbox.sc.edu
2016-07-22	16:15:06		Blank customizable letter (Document #00004179) letter sent via email to (dunavana@email.sc.edu)
2016-07-22	16:15:14		Email link clicked for 2015021301CustomLetter.pdf (Document #00004179) from IP address 23.120.168.67. User agent: Mozilla/5.0 (Windows NT 10.0; WOW64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/51.0.2704.103 Safari/537.36
2016-08-03	15:01:09		Successful viewing of 2015021301CustomLetter.pdf (Document #00004179) from IP address 23.120.168.67. User agent: Mozilla/5.0 (Windows NT 10.0; WOW64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/51.0.2704.103 Safari/537.36
2016-08-03	15:01:15		Email link clicked for 2015021301CustomLetter.pdf (Document #00004165) from IP address 23.120.168.67. User agent: Mozilla/5.0 (Windows NT 10.0; WOW64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/51.0.2704.103 Safari/537.36
2016-08-03	15:02:20		Successful viewing of 2015021301CustomLetter.pdf (Document #00004165) from IP address 23.120.168.67. User agent: Mozilla/5.0 (Windows NT 10.0; WOW64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/51.0.2704.103 Safari/537.36
2016-08-03	15:02:21		Email link clicked for 2015021301ChargeInformalComplainantLtr.pdf (Document #00004045) from IP address 23.120.168.67. User agent: Mozilla/5.0 (Windows NT 10.0; WOW64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/51.0.2704.103 Safari/537.36
2016-08-30	09:11:20	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-08-30	11:19:25	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-08-30	11:21:47	Carl R. Wells	Database entry updated. TYPE changed from Bullying to Title IX, Harassment, INCIDENT_SUMMARY changed from (no value set) to The Complainant alleges that during the course of International trip sponsored and coordinated by the Respondent, she was subjected to gender harassment and bullying by the Respondent.
2016-08-30	13:02:09	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-08-30	13:09:17	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-08-30	13:09:34	Carl R. Wells	Database entry updated. CHARGE_1 changed from Bullying to Gender (Title IX) Harassment
2016-08-30	13:43:43	Carl R. Wells	Investigative Report, Long Version, Student letter saved in progress to Carl R. Wells's folder
2016-09-13	12:32:03	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-09-13	12:36:54	Carl R. Wells	Case record accessed on Update Existing Case screen
2016-09-13	13:03:20	Carl R. Wells	Document #00004993 Voros Statement.pdf added for entire case
2016-09-13	13:03:20	Carl R. Wells	Document #00004994 [REDACTED] Statement.pdf added for entire case
2016-09-13	13:03:20	Carl R. Wells	Document #00004995 [REDACTED] Statement.pdf added for entire case
2016-09-13	13:03:20	Carl R. Wells	Document #00004996 Alexandra Stasko Statement.pdf added for entire case
2016-09-15	06:34:25	Carl R. Wells	Case record accessed on Update Existing Case screen

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Office of Equal Opportunity Programs

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Dunavant v. Voros

From: MILLER, ALLEN
To: WELLS, CARL
Subject: FW: Monte Castello
Date: Tuesday, August 30, 2016 11:17:54 AM

Paul Allen Miller
 Vice Provost, Director of Global Carolina
 Carolina Distinguished Professor of Classics and Comparative Literature
 102 Osborne Administration Building
 University of South Carolina
 Columbia, SC 29208
803-777-2808
pamiller@sc.edu

From: Alexandra Stasko [anstasko@g.coastal.edu]
Sent: Thursday, May 19, 2016 9:51 AM
To: MILLER, ALLEN
Subject: Monte Castello

To Whom it May Concern,

My name is Alexandra Stasko and I am writing to you because I am greatly bothered by events that have taken place here at the International Center or the Arts, where I am currently working as an assistant for my former professor, David Voros. I am compelled to write this email because I feel that my perspective on the situation may be of use when figuring out what has transpired. These events involving Allison Dunavant are baffling. However, in the days that I have observed her behavior I am not surprised at how immaturely she has handled the situation.

From the first day I arrived I immediately noticed how unsatisfactory her performance was as a worker, especially when compared with the other two assistants and myself. This is my second summer here in Monte Castello and I am very familiar with the expectations of this position and the operations of the school. There were many instances in which Allison would slack off, refuse to complete certain tasks and play on her phone incessantly. She also missed a whole day of work because she drank more alcohol than she should of consumed. You can imagine how frustrating this was to myself and the other assistants when we were all in this together to work and reap the incredible benefits of our situation. The opportunity to stay for an extended time in Italy, be accommodated and fed wonderfully and to be able to work in a private studio space is something that I will always be grateful for. It was perfectly understood that I would be working in exchange for this privilege. To see Allison be unappreciative and not uphold her end of the bargain was very irritating on a personal level.

When the situation occurred where Allison and the two other assistants missed their train I believe David acted in a reasonable and in a professional manner. I want to stress that I wholeheartedly support his actions. I have had many supervisors who would not have tolerated a fraction of what Dave has tolerated in regard to her behavior. After Allison's blatant disrespect to his face, refusal to admit to any fault in the situation and her childish reactions I believe having her sent back home was the best move for everyone. If you have any questions or would like more detailed information, please feel free to contact me.

Sincerely,

Alexandra Stasko

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Office of Equal Opportunity Programs

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Dunavant v. Voros

From: MILLER, ALLEN
To: WELLS, CARI
Subject: FW: International School of Arts Incident
Date: Tuesday, August 30, 2016 11:19:46 AM

Paul Allen Miller
 Vice Provost, Director of Global Carolina
 Carolina Distinguished Professor of Classics and Comparative Literature
 102 Osborne Administration Building
 University of South Carolina
 Columbia, SC 29208
 803-777-2808
pamiller@sc.edu

From: [REDACTED]
Sent: Sunday, May 22, 2016 9:46 PM
To: MILLER, ALLEN
Subject: International School of Arts incident

Hello Mr. Miller

My name is [REDACTED]. I'm currently an undergrad at USC pursuing my BFA in studio painting. I wanted to write to you concerning an incident in which my peer Allison Dunavant I feel acted ill-tempered toward Professor David Voros. Before me, [REDACTED], and Allison traveled to Italy David explained materials to bring, various tasks we would work on throughout the building/studios for 5 hours a week, possible time for us to go places ourselves on weekends, and furthermore explained rules/safeties of the University. We agreed to the University rules, and decided to work more hours to get done faster to go on more trips.

This incident occurred after we came back from a trip to Rome. No complaint was made from Allison until the moment we missed our train connections, thus having to spend the night in Terni. What was explained from David before our parting to Rome was upon this break if we went to Rome it was important to check train times so we would be back on time to catch the train to Fratta Todina. At this location he would be able to pick us up. If we missed that train then we would have to spend the night. Which none of us had a problem doing, and agreed to spend the night if we missed our train. In no way I feel our safety was in jeopardy during our stay in Monte Castello, or during our trip to Rome and back. Communication was no problem either by phone or email.

Allison felt as if David was obligated to pick us up after we missed numerous trains. She chose to voice her opinion through negative emails, and actions toward David at our stay in Terni. Before planning our trip to work with David we talked what needed to be done as far as work, how fortunate an opportunity this was, and paintings/sculptures we would see amongst each other. With David's help he provided full funding to pay for my ticket, providing food for us constantly, reassuring rules, making sure to provide materials we didn't bring, and making sure we remained happy.

I felt as if I could help with some understanding since I was 1 of 3 to participate in this situation, also having spent time with Allison to know her attitude.

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Dunavant v. Voros

From: MILLER, ALLEN
To: WELLS, CARL
Subject: FW: USC MFA Student
Date: Tuesday, August 30, 2016 11:18:44 AM

Paul Allen Miller
 Vice Provost, Director of Global Carolina
 Carolina Distinguished Professor of Classics and Comparative Literature
 102 Osborne Administration Building
 University of South Carolina
 Columbia, SC 29208
 803-777-2808
pamiller@sc.edu

From: [REDACTED]
Sent: Sunday, May 22, 2016 11:41 AM
To: MILLER, ALLEN
Subject: USC MFA Student

Dear Mr. Miller,

My name is [REDACTED], and I'm currently writing to you from Monte Castello, Italy. I just wanted to take a moment to inform you of my experience in regards to the recent incident involving a fellow USC grad student and my Painting professor and employer, David Voros. As you already know, Allison Dunavant has decided to leave earlier than her original departure date, May 22, 2016. Like Allison, I purchased a round trip from Myrtle Beach, South Carolina to Rome, Italy, Leonardo da Vinci Intl Fiumicino (FCO). Prior to leaving the United States, David asked [REDACTED], Allison Dunavant, and myself to join him for a group meeting in order to confirm dates, times, meals, and work-load expectations. The four of us were informed of our daily tasks, which average out to be about five hours a day. Since our arrival, we have worked Monday through Friday from about 10:00 am until 3 pm. Sometimes longer and sometimes shorter, depending on how long it takes us to cook breakfast and lunch. Nevertheless, we have maintained a healthy work schedule and have been provided with ample amounts of food. David has been extremely gracious in providing us with exotic meals, personal studios, art supplies, free travel, and trips to several extraordinary locations. In addition to our work, we have been able to travel to Todi, Assisi, Perugia, and Rome, all of which transportation was free. We've also had the privilege of meeting and dining with two well-known American artists, Alan Feltus and Lani Irwin. They were so incredibly humble, and I must say that we simply wouldn't have been to meet such amazing people if it weren't for David. I can't stress how appreciative I am for this opportunity here in Italy with a wonderful group of friends and an incredibly passionate professor. I hope that this letter finds you well and that my writing helps shed light on the situation as a whole. Thank you so much for your time.

Sincerely,

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Dunavant v. Voros

Cody Unkart

USC - 0330

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Office of Equal Opportunity Programs

Dunavant v. Voros



UNIVERSITY OF
SOUTH CAROLINA

EOP CASE #2015021301

Investigative Reports
Letter of Determination

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Office of Equal Opportunity Programs

Dunavant v. Voros



Equal Opportunity Programs

September 15, 2016

Allison Dunavant
2190 Liberty Cir
Little River, SC 29566-9103

**PERSONAL AND
CONFIDENTIAL**

Regarding Case Number: 2015021301

RE: Allison Dunavant, *Complainant* v. David Voros, *Charged Party*
Case Number: 20150213

**INVESTIGATIVE REPORT CASE NUMBER 20150213
CONFIDENTIAL**

DATE: September 15, 2016

TO: Title IX Coordinator

FROM: Carl R. Wells, Asst. Dir. - EOP RE: Case # 20150213

I. INTRODUCTION AND BACKGROUND

This confidential investigative report addresses allegations of violations of the USC 'Discriminatory Harassment' and 'Student Non-Discrimination and Non-Harassment' Policies (EOP 1.03 and STAF 6.24). This complaint was filed by Allison Dunavant, a student at University of South Carolina at the time of the alleged incident. Asst. Dir. EOP, conducted the investigation into these allegations. The USC EOP Office is charged with the investigation and review of the charges as filed and the issuance of a letter of determination pursuant to applicable University policies. This report shall be shared only with university officials who have a need to know.

A. Involved Parties

- Complainant: Allison Dunavant, Race: Not Hispanic or Latino; WH, Gender: Female, Classification: Graduate, Major: Art Studio
- Charged Party: David Voros, Race: White, Gender: Male, Classification: Professor, Major: Art Studio

- Witness 1 (Hereinafter referred to as "W1": Alexander Stacko, Race: White, Gender: Male, Classification: Graduate Student, Major: Art Studio)
- Witness 2 (Hereinafter referred to as "W2": Cody Unkart, Race: White, Gender: Male, Classification: Graduate Student, Major: Art Studio)
- Witness 3 (Hereinafter referred to as "W3": Antonio Griffin, Race: Black, Gender: Male, Classification: Undergraduate Senior, Major: Art Studio)

B. Jurisdiction

Pursuant to STAF 6.4 and EOP 1.03, the USC EOP Office is charged with the investigation and review of the charges as filed and the issuance of a letter of determination. This report shall be shared only with university officials who have a need to know.

C. Alleged Violations/Jurisdiction:

The Charged Party were given a verbal Notice of Investigation (NOI) on . The NOI informed the Charged Partt that an investigation was being conducted by the University, on behalf of the Complainant. The NOI covered possible violations of the following University policies:

1. EOP 1.03 entitled "Discriminatory Harassment Policy" -- Gender Discrimination
2. STAF 6.24 entitled "Student Non-Discrimination and Non-Harassment Policy"

The Charged Party was given written Notice of Investigation (NOI) on March 3, 2016 and again on June 9, 2016. The NOI informed the Charged Party that an investigation was being conducted by the University, on behalf of the Complainant. The possible violations to be discussed regarded the following University policies:

(Section B Definition of Prohibited Conduct)

Staf 6.24 Student Non Discriminatory Harassment and EOP 1.03

1. Discrimination

Discrimination is the unfair or unequal treatment of an individual or a group based upon race, color, national origin, religion, sex, gender, age, disability, sexual orientation, genetics, veteran status, or any other category protected by law, that interferes with or limits the ability of an individual or group to participate in or benefit from the services, activities, or privileges provided by the University.

2. Harassment

Harassment is a specific type of illegal discrimination. It includes conduct (oral, written, graphic, or physical) which is directed against any student or group of students because of or based upon one or more of the characteristics articulated in Section II above, that is sufficiently severe, pervasive, or persistent so as to interfere with or limit the ability of an individual or group to participate in or benefit from the programs, services, and activities provided by the University. Such harmful conduct may include, but is not limited to, objectionable epithets, demeaning depictions or treatment, and threatened or actual abuse or harm. Harassment does not include the use of materials by students or discussions involving students related to any characteristic articulated in Section II for academic purposes appropriate to the academic context.

D. Standard of Proof:

In order to determine that a student has violated the Code of Conduct, the University's Student Non Discrimination Policy, STAF 6.24, provides that the standard of proof required is a preponderance of evidence, i.e., the evidence demonstrates that it is more likely than not

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that the conduct occurred. Preponderance of evidence means evidence which, when fairly considered, is more convincing as to its truth than the evidence in opposition. This standard is often referred to as "50% plus a feather." In determining whether there is reasonable cause to believe that illegal discrimination or harassment occurred, the EOP Office utilizes the preponderance of evidence standard.

History of Case

Date incident was reported to the Office of Equal Opportunity Programs: May 16, 2016

Date Incident occurred: May 1, 2016

Date the EOP Office opened this case: May 23, 2016

Date of the EOP Hearing: May 23, 2016

Date the case was closed: September 15, 2016

Case assigned to: Carl R. Wells, Asst. Dir. - EOP

Hearing type: The initial hearing type was mediation. When the mediation failed (both parties were not willing to agree to the terms), EOP then conducted a formal investigation. Please note that this case has been opened for several months because when the incident was initially reported both parties were out of the country. After C returned to the US, Charged Party was still out of the country throughout the summer months. In addition, the first attempt to mediate the situation failed.

II. INTERVIEW SUMMARIES FOR COMPLAINANT AND RESPONDENT

AND WITNESSES Case Summary:

The Complainant alleges that during the course of an International trip sponsored and coordinated by the C, she was subjected to gender harassment and bullying by C. As indicated later, the trip in question was not approved, sanctioned, or supervised by the University of South Carolina and did not go through the University's study abroad approval process.

Initial Incident Report, Submitted by Dale Moore, Graduate School

Ilene Dunavant, mother of Allision Dunavant, MFA student, called at about 10:AM on 5/16 to discuss her concerns about her daughter's living and work conditions and ask for help in helping remove her from what she described as dangerous and unacceptable living, working, and travel conditions. She cited numerous email communications from her daughter complaining about her treatment while participating in a "USC-sanctioned Study Abroad" experience. She talked about unreasonable unsafe living and working conditions, improperly supervised travel excursions, food deprivation as punishment for laziness, ostracization, and abusive language. These allegations were made against her host and employer, David Voros, USC Associate Professor in Studio Art, "owner" of the USC in Monte Castello school in Montecastello de Vibio, Italy. She feared for her daughter's safety and emotional well-being and seemed desperate for USC to intervene. She also shared her daughter's concerns that complaints and plea for help could lead to academic retaliation. Her concerns had been reported to our Campus Police, Office of Study Abroad, and the Office of the Provost.

Statement Provided by C

I am a graduate student pursuing my Masters of Fine Arts, in Studio Arts with a

concentration of Painting, in the School of Visual Art and Design at USC. I have completed one year of my degree and have two years left in the program; the second year which I am to begin this coming August. David Voros has been my professor for both Fall 2015 and Spring 2016 semesters of this past school year. I have taken his 800 level painting seminar both semesters, as well as his 500 level advanced life drawing course. While in Professor Voros' seminar course, he suggested to me several times that my artwork would greatly benefit from visiting Italy and seeing artists' work in person, such as that of Titian and Michelangelo. I reciprocated this desire to go to Italy because of the possible benefit the experience would have on my artwork, and thus on my degree as a whole. I looked into the "USC in Italy" trip and could not find any financial aid available for grad students, and renounced it as a possibility. David Voros then helped me write a SPARC Grant proposal, with the hopes of potentially funding a trip for myself to Italy. It proposed that I used the \$5,000 that could be awarded by the grant for a plane ticket to Rome, Italy as well as for an artist's residency at Montecastello Di Vibio, International Art Center (ICA). I learned after arriving in Italy that David Voros is co-owner of this facility. Professor Voros also wrote a recommendation for me to be nominated for the Rhude M. Patterson Graduate Fellowship; an amount, if awarded, that would also be \$5,000. When I did not receive either award, David Voros presented the idea and opportunity for me to go to Montecastello di Vibio, Italy with him for three weeks. He also invited two other students, [REDACTED] and [REDACTED]. Professor Voros pulled us aside during class time to discuss the details of this trip. He suggested we either come during the month of May (prior to the "USC in Italy" group arriving) or May 22nd-June 12th (with the "USC in Italy" group). Professor Voros ended up stating that I, and the other students, should come to Montecastello during May because he was unsure that there would be enough space when the USC group arrived. He said he would provide meals and accommodations in exchange for us helping him get the ICA ready for the USC group's arrival. The only thing we were to purchase on our own was our roundtrip plane tickets. He made it clear that we would have plenty of time to explore various Italian cities, to make excursions to see art, and to spend time in studio spaces working on our own artwork. He emphasized to me, on several occasions, the value and benefit this trip would have on my education. This was the foundation of my presumptions for the trip and with that in mind, I decided to go. Based on the verbal discussions I had personally with Professor Voros, I anticipated light work and some minimal cleaning in order to ready and organize the ICA for the incoming students. There was no written description regarding expected duties, tasks, or what work needed to be accomplished.

There was only an email, after my plane ticket was purchased, that stated in brief, that there was "a lot of work" to be done. There was no work/employment contract or written agreement and I was not presented with, nor did I sign, any document that was compliant with a preset expectation of scheduled daily manual labor. All I had in mind, and the sole focus that compelled me so strongly to go on this trip, was seeing and making art. I wanted to better my art and therefore enrich my experience as an MFA student.

When I arrived in Montecastello at the ICA, along with the two other students on May 4th, I had no unusual expectations of our accommodations. I had no expectations of luxury. I anticipated, however, that our accommodations would be safe, clean, and comfortable. What I observed did not coincide with this. Montecastello is a small hilltop village that is circular and maze-like, and I believe dates back to Medieval times. Very few of the locals speak English, and there are only a couple of restaurants; a coffee shop, a bakery, and two tiny markets that sold lunch meats, snacks, and a few toiletries. The building we stayed in, the ICA building, had an air condition/ heating system but was not turned on, and therefore the building remained cold. (see photos) This was especially true and a problem for sleeping at night when the outside temperature dropped into the 40s. I slept in leggings with sweatpants over them, socks, a long sleeve shirt, and a sweatshirt to combat the cold temperature. There were no bedding or linens, nor towels or rugs in the bathrooms. We had what we brought with us. Scorpions, spiders, and other insects were everywhere within the building. (see photos) Furthermore, the building as a whole was dirty. We were essentially staying in a building that was not deemed fit or ready for the "USC in Italy" group, but by Professor Voros' standards was

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okay for us. The bathrooms were uncleared and the little spigots on the shower heads were blocked and did not work properly. For me, one of the most undeniable instances of the state of filth was the cat spray/urine that was prevalent in nearly every room, and on every floor. (see photos) The smell of this permeated through the building. David Voros informed us that there were a lot of cats in the village and that they'd gotten into the building over the winter. The [redacted] t with me came back covered in urine (see photos). Aside from this, [redacted] and I immediately began working to prepare the school the following morning May 5th. For the first few days of our stay we worked immediately following breakfast (8 am) until lunch (2 pm) and then after lunch until dinner (8 or 9 pm). All meals were provided by and served at David Voros' home.

The nature of the work that we ended up doing was beyond anything I could have, or ever would have, anticipated. Some of the tasks we were required to do included cleaning a terrace covered with cat feces and debris, dumping out dirt filled planters, pulling nails and tacks out of walls, moving furniture, scraping tape off of shelves, scrubbing dried clay off of tables and boards, using brooms to knock down spider webs, removing paint from bricks with a sponge, painting a basement and attached room, and scrubbing cat urine from couches and their cushions. (see photos) We spent a lot of time in the basement which was cold and damp. I was congested and having headaches as a result; overall not feeling well for most of my stay. Although I did not agree with the type or work Professor Voros had us completing, I worked hard and complied with everything that was asked of me. The only thing I refrained from doing was lifting couches and armoires and carrying them up/down stairs. I did not think that this was a task that was physically safe for me to do as a small female and could not keep up with the other two male students in this regard. I was singled out by David Voros and the other students as not being a hard- worker which created an uncomfortable work environment. This work was not the type of set-up work I had anticipated on doing while in Italy. I did not even pack clothing that was in accordance with this type of labor, because I had no idea that it was what would be expected. Had I known, I would have decided to stay home. During my stay, I was not provided with any ample studio time or opportunity to work on my personal artwork. All time was used as time for labor. Professor Voros said we could go to the studios (which were a separate building from where we slept) after dinner or during the night. Dinner typically ended at 12 am or later, 11 pm if we cleaned up quickly, and we had to get up the following morning at 7 am. With these things in mind, this was not a viable opportunity to do artwork in the studios. Nor was it an opportunity that I felt was safe. We made two abrupt trips to Perugia and one to Assisi (May 8th), about an hour and a half in length each, because Professor Voros had errands to run in these places. These trips were brief and extremely rushed, to the point of not being able to see all of even one museum or church.

Alex Miller, a former USC MFA student arrived, on May 9th. I am uncertain what her position is within the university but she has been participating in classes, and using materials from the ceramics lab, for the past year that I have been at USC. I am also uncertain as to her purpose of being in Montecastello.

On May 13th we were supposed to work for part of the morning and then go to Rome in the late afternoon. I woke up at 7 am and was had a migraine. I skipped breakfast and spent the morning throwing up. I am not sure what triggered my migraine; it could have been some of the foods we were eating, having a couple glasses of red wine the evening prior or just overall exhaustion and exposure to cat urine and feces as well as dirt. I skipped breakfast and went back to sleep to try and rid myself of the migraine. I thought this would be okay that I missed one morning of work, because David had let Alex Miller take an afternoon off before for being hungover; and I was actually sick. I profusely apologized to Professor Voros after lunchtime when I was feeling better and had stopped vomiting. He said not to worry, that no one enjoys or plans on being sick. He then suggested I could put in 30 mins of work or go ahead and get ready to go to Rome. I chose the latter. David Voros dropped off [redacted] and I at a bus stop near an Ikea outside of Rome. He said he was unable to go with us to explore central Rome because he had too much work to do in order to set up the school. He proceeded to go to Ikea to shop

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with Alex Miller. We were left with a map containing circled locations of art Professor Voros thought we should see and instructions to be at the train station, Termini, the following day by 6 pm so that we could make the connection from Rome to Terni, and then Terni to Fratta Todina. Directions were unclear, limited, and hasty. We stayed at a hotel together that night and explored Rome the following day, May 14th. We made it back to the Termini train station by 6 pm, as instructed, which proved to be too late to catch the last train going to Fratta Todina that evening. So we were [REDACTED] Terni and it was 8 pm local time. [REDACTED] called David Voros, because [REDACTED] and I did not have cellular service [REDACTED] because we were uncertain as to what [REDACTED] in this situation, having only planned to spend one night away from Montecastello. He responded saying he could not pick us up from Terni because it would be a 2.5 hour trip for him; we would have to spend the night. We found a bus/train that could take us to Todi station, a town we were familiar with outside of Montecastello. We presented this option to Professor Voros to which he responded, "Who will pick you up from there? You guys should have followed instructions better." [REDACTED] and [REDACTED] had both conceded to staying in Terni over night at this point but [REDACTED] not succeeded in getting a hotel. They were considering sleeping in the train station. I felt highly unsafe and uncomfortable doing this and eventually convinced them to get a hotel with me for the night. I was able, once on the hotel's wifi, to look up how far we were from Montecastello as well as how far the Todi station would have been from Montecastello. Terni was only a 30-45 minute drive from where Professor Voros was in Montecastello, and Todi only a 15 minute drive. I was extremely confused as to why Professor Voros could not pick us up, when we were in such close proximity to him. He stopped answering his cell phone after a certain point. I emailed David Voros, (see email correspondence) because I had no other way of communication with him, to try and figure out why we were being left in a town overnight-again only being a short distance from Montecastello and the ICA. It felt like punishment. David cc'd, or copied, [REDACTED] on the emails I sent and called him to tell him to check his email. I am not sure what the purpose of including him in our email correspondence other than to make it seem as though I was the only

one that felt that way.

The next day, May 15th we missed the 11 am train towards Fratta Todina because we thought we were waiting for a bus, and therefore were on the wrong side of the station. No one in Terni spoke English and we did not speak Italian, which made getting directions/instructions a difficult task. We were able to get a hold of David Voros at some point during the morning, and he said if we were not at Fratta Todina by 1:30 pm that we would be on our own in terms of getting up the hill and back to Montecastello. We made it on the next train out which at 2 pm and arrived at the Fratta Todina station at 3:40 pm. We tried calling Professor Voros, received no response, and began walking up the hill towards Montecastello. This was easily an hour worth of walking with a steep incline, along a winding road. Half way through this walk, David Voros calls to ask us where we were at. We stop where we are to wait for him to pick us up alongside the road. When he pulled up we went to get in the vehicle and put our bags down but he told us we were not allowed to get in the car; he wanted to have a group talk first. He got out of the car and began shouting at us and stating we were all adults and should have better followed his instructions. He also said that we were not in Italy in association with the University or otherwise with any program; that we were there because of his generosity. I looked away to compose myself; I was hungry, thirsty, tired and being scolded at in a tone I perceived as hostile. I felt like I was going to cry so I thought it was better to look away. Professor Voros understood this as an offensive gesture and told me to look at him when he was speaking. He directed the rest of the conversation towards me and went on to say that I was rude, ungrateful, and all I had done since I had been there was "bitch." Professor Voros also stated that I owed him work and how he could have picked other students that would have been harder working and more grateful than I was. I told him that maybe he should have picked another student to come because I had no idea that the trip would be almost entirely comprised of working. This enraged David Voros enough to make me both scared and intimidated by him. He said I could find my own way back to Montecastello, removed my things from the ICA building, and leave. He then asked [REDACTED] and [REDACTED] to get in his car with him and they did. They started to pull away, leaving me there alongside the road. I was having a panic attack and hysterical at the thought of being left behind in the middle of nowhere, with no water, in a country whose language I did not know. I called my mother to help me calm down and figure out what to do; she put me on the phone with my father since she couldn't understand me. My cell service kept going in and out and I was having trouble breathing evenly. Professor Voros had stopped pulling away in the car and Alex Miller got out. She came to talk to me and said I needed to apologize to David before I could get back in the car. I said I would not apologize, because I hadn't done anything wrong. She waved down someone who was driving by; that I guess was a local. He drove me back up to Montecastello. I waited for David Voros to leave the school building so I could go to my room peacefully and figure out what to do, or to get my stuff but he wouldn't leave the ICA building. I did not want to be near him, for fear of what he might do. I walked to the one hotel that was in Montecastello and asked if there was vacancy; there was not. So I walked back to the school building and sat outside to wait for David to leave the building. I stayed on the phone with my parents the entire time.

Alex Miller eventually came outside to speak to me in place of David. She asked me what I was planning on doing and when I would be able to get my stuff out of the building and leave. She tried to tell me that David had made no threat to me, and did not leave me on the side of the road; that I elected to do this on my own. This is false. I told her that he couldn't just kick me out, with nowhere to go in Italy- because I'd be completely alone. Her reply was that he could because it was his property; that he could call the police if I refused to leave. This greatly concerned me because there was no vacancy at the sole hotel in Montecastello and no public transportation that came to the town either. She went on and said I hadn't been working hard and that she was personally offended by this; she questioned me as to whether I had ever held a real job. She claimed that David was my employer, my boss, and that I was his employee. I said no, I was not his employee and he was not my boss-I never signed or agreed to a contract of employment. My relationship to him was a professor-student one. However, I asked her to give me examples of when I hadn't been working hard enough because once again I did not understand where this was coming from. She said it bothered her that I didn't jump up quickly to do dishes the morning she was hungover, and also that I had straightened my hair and put on makeup to go to Rome after having a migraine all morning. She accused me of being hungover or wanting to get out of working. She provided no actual instances of me not working. I was on the phone

with my mother who heard this conversation and spoke with Alex when I was having trouble speaking because of crying and being so upset and scared. After speaking with my mother Alex went back into the school building, leaving me outside while she went to go speak with David. She came back out and said that it was all just a misunderstanding and that I could stay at the ICA for the night. She said that I should not go to dinner at his house, that she would try and get him to cool down, and that I should talk to him in the morning to apologize. She said I should not go to breakfast either, that I should apologize after. Once again, I said I would not apologize for things that I had not done wrong. I told her I would be quiet and keep working in order to have somewhere to stay and to eat. She said she didn't think David [REDACTED] that. I stayed in my room the rest of the evening and night and around 11:30 [REDACTED] brought me leftovers from their dinner.

The following morning I did not go to breakfast and while the other students were still at David's home cleaning up from breakfast, David came and asked to speak with me. I was hesitant to speak with him. David said he has never had a student as disobedient and rude as I was, in his 20 years of teaching. He said he would report me to the art department and have my emails forwarded to Andrew Graciano. He continued on and questioned my understanding of the trip to Montecastello and said that I was his employee and owed him work. I told him this was the first time I was hearing anything from him about being employed. He said I owed him 5 hrs of work a day for 5 days a week for as long as I was in Italy. I expressed to him that this was never part of our agreement [REDACTED] he term [REDACTED] coming to Italy. David said he was having the other two students, [REDACTED] and [REDACTED], email him to say that their understanding of the trip aligned with his. I said [REDACTED] his wa [REDACTED] vant because we all had separate verbal agreements or understandings of the trip, and what was said to me could have easily differed from what was said to the guys. I told him exactly what I said to Alex, that I would work peacefully so that I had a place to stay and food to eat. He said no because I didn't have the appropriate attitude and that I could not work until he had deemed my attitude had been changed. Professor Voros also said that if I did not work then he could not provide me with meals. He then said I needed to wait with him in his office until the other students returned because he wanted to have them tell me that I was wrong about my understanding of the trip. In that moment I became uncomfortable with the idea of waiting alone with him in his off [REDACTED] because of his harsh tone towards me, so I told him that I was going back to my room. [REDACTED] brought me cold breakfast leftovers, with no utensils.

I went into the laundry room to retrieve the clothes I had left in there; I wanted to make sure all of my belongings were con [REDACTED] ed just in case I got kicked out or forced to leave suddenly. I ran into Alex and [REDACTED] in the laundry room. Alex asked me what I was going to do if I didn't plan on apologizing to David. I responded saying; hopefully I could just work peacefully with everyone until leaving a week later. I expressed that I just wanted to have an ensured place to sleep and food. She said that couldn't happen until I apologized. I told her I was trying to get in touch with USC to find a solution. She said she knew because David had been contacted by someone there, likely Allen Miller. She said that following this conversation David was immediately contacting a lawyer and that's where he was presently. I got scared at this point because I didn't know what this meant for me and my situation. I was also contacted by Allen Miller (around 11 am-12pm) who told me that USC couldn't do anything for me or about the situation until I was back in the United States. He said that USC could make sure I had money for food if I had problems with that. He kept asking me if I felt safe. I said that it depended on how you defined safety; I was not immediately in physical danger but my situation was unpredictable, David was unpredictable, I was stuck, and I did not have food. Not long after this Alex came and spoke with me (see recording).

Sometime shortly after this everyone left for lunch at David's house. I was not given lunch, and wandered around Montecastello during this time trying to find somewhere to eat because I was hungry. Everywhere was closed for the next few hours for siesta so I had cookies and an orange I found in the school building. When they returned from lunch David asked to speak with me again, but this time with Alex Miller present (see second recording.) He started the conversation by stating that I had a few options but by the end of the conversation, during which I barely had a chance to speak, he had made the decision for me. I would have to provide my own food and transportation if I needed to leave. Both tasks were next to impossible. There is no transportation that leaves Montecastello, the only way to get a ride is if you know someone who has a car. Again, I did not speak Italian so this would be quite difficult. He wanted me to call my mother immediately and tell her I was

safe. There was a large emphasis on this. I learned soon after this from my mother that USC could have helped me leave immediately if they thought I was unsafe. Someone else from the University had contacted her saying that I was safe. Allen Miller and David Voros did not present this option to me. They both insisted that I tell everyone I was safe, when I clearly did not feel safe. They withheld this information from me. This makes me immediately panic, that I would be stuck in this environment without food and without anywhere to go for a whole week. I was able to get back in contact with Allen Miller and his assistant Trudie helped me arrange a flight to leave Tuesday morning. David Voros somehow got me a hotel room (not sure how this happened because they were booked when I asked Sunday evening) and I was able to eat dinner. David also arranged for a local Italian man to drive me to the airport at 6 am the day of my flight; Tuesday morning.

Charged Party's Response

As per your request, I am providing below the circumstances regarding the situation in Italy with Allison Dunavant.

After speaking with Allison prior to her departure and reflecting on circumstances surrounding these issues, my opinion and - as described later in this account, the perspective of others who witnessed our interactions - is that Allison's version of events, as well as her understanding of her verbal agreement with ICA does not accurately represent what transpired. Nonetheless, I feel that both I - and ICA as a whole - have acted rationally, responsibly, and appropriately in addressing the situation. Further, that we have acted in a way that is in keeping with company protocols developed in context of both U.S. and Italian labor law.

In terms of background, I should point out first that it has long been a tradition with the art school in Monte Castello to provide working scholarships for students as a means of helping talented students from less affluent families study in Italy. As I expressed to you numerous times, coming myself from a family of limited means and thus unable to study abroad, this is a particular mission of mine. However, this is also a common practice among artist residencies around the world and I invite you to search Artist Residences in Italy and you will soon find among the many options:

working scholarships. At ICA, we will provide six of these opportunities for students from diverse institutions and for varying periods of time in the course of the summer. Despite our objective at ICA to provide opportunities to disadvantaged students however, common sense would dictate that as an employer and business-person, I must also be vigilant to the needs of our company and coordinate things in an effective manner. This includes notifying employees if their performance is sub-standard. I believe this is not only entirely reasonable, but expected.

Regarding the current situation with USC students: ICA offered working scholarships to 3 students from USC: two graduate students and one undergraduate student. All three sought to participate in the USC in Italy program, however all were unable to find sufficient financial support for their endeavor. One student's need was so great in fact, (in contrast to his initiative) that we also elected to purchase his transatlantic plane ticket.

This spring, one of the USC students, Allison Dunavant, came to me complaining that as a graduate student, there were no sources of aid available to her through USC Study Abroad. As you recall, I referred her to you. Your advice (according to my recollection) was for Allison to seek funding through the department or college. With this in mind, I advised her to apply for CAS funding and assisted her in applying for a CAS scholarship for grad students. Together with my colleague, Andrew Graciano (whose input I encourage you to seek), coordinator of our grad program in SVAD at USC, I recommended her for the funding. Andrew also recommended her for another grant, for which I provided a letter of support to the college.

Ultimately, because I felt that these three were serious and committed students I met with them together in mid-March off-campus and I told them of the opportunities for work-study scholarships provided by ICA. In this case, their activities would be in preparation for the USC group on May 23.

The situation our company offered them was that in exchange for working five hours per day, five days per week, ICA would provide accommodations, meals, and studio space for them. I made it clear that during their off-time, they could travel at their own expense, but that sometimes they could also accompany me on errands to locations that could be of interest to them and to remain there (again returning at their own expense) on week end, without reservation. At the time, we discussed the parameters of their duties and obligations at length., I will also point out that we had numerous meetings together after the groups arrival to confirm the implementation of this schedule in terms of daily events. I feel quite confident that after speaking with the rest of the group that they were clear on the parameters of the arrangement.

Upon the students arrival - and until Friday - all seemed to be going according to plan and all seemed satisfied. The group was assigned tasks around the building that included painting walls and cleaning as previously agreed. The work was not particularly strenuous and no one expressed complaints or indicated any health issues that would hinder the performance of their duties. Overall, the group was clearly enjoying the experience and were also producing artwork, which we discussed as a group. In the course of my own activities, I took them to visit museums in Perugia and Assisi, where we spoke together about masterpieces in the collections. Throughout their stay they had been provided meals, which we prepared communally, which we will continue to do until our kitchen opens on Thursday.

In the course of their stay thus far, I have met with the group frequently and discussed the workload and conditions (as we continue to do) and to plan future activities - all seemed agreeable that it was a fair arrangement and in keeping with our verbal agreement and their expectations. Allison was of course engaged in this discussion and expressed no reservations about the type of work she was assigned or the workload, nor did she at any time advise me of any health concerns that would impair her ability to work, or that could otherwise endanger others. Despite the fact that she voiced no objections to the work or workload to me directly, several students expressed to me that Allison told them that if I wanted certain work done (such as cleaning) I should do it myself. Following our Thursday meeting, two of the students came to me afterward expressing frustration that they felt Allison was not doing her share of work and placing additional burden on them to complete their tasks. Both expressed that were frustrated that Allison seemed to be spending a lot of time on the phone and that her work pace was erratic.

I spoke to her about this and also advised my assistant, Alexandra to more closely monitor Allison's work progress and to assign appropriate tasks to what appeared to be in her abilities. Alexandra reported to me that while Allison was argumentative, she agreed to comply.

I became quite concerned about the situation developing in Monte Castello with her peers and spoke to Allison about her job performance in Monte Castello. In the course of our conversation, Allison agreed to apply herself, but was argumentative. Afterward, other students came to me in confidence and reported that she told them that she did not feel that she needed to acknowledge me as her supervisor and complained that she did not feel a need to do manual labor. This of course seemed strange to me, since I quite clearly explained the activities the group would engage in in exchange for their stay and no one felt his unreasonable.

On Friday Allison failed to show up to work, complaining of a headache. Allison then slept until lunch and then afterward spent the remainder of the day packing for the weekend trip to Rome while the other students worked. Allison appeared to be in good health and spirits at that time.

The other students appeared quite agitated about the situation and complained. Consequently, I asked Alexandra to speak to Allison again when the group returned from their trip on Saturday.

On Friday afternoon, since I had business in Rome, I agreed to take the students to a suburban Rome location from which they could take a bus into the city. My colleagues, Eros, our general manager and Alexandra our staff manager, and I dropped them off them at a central bus station where they could find transport to their hotel in Rome, where I had made a booking for them (Best Western Canada). Alex, Eros, and I walked with them to the bus stop to be sure they got on the correct bus. I provided them with a map and an itinerary for Rome and specific instructions on how to find their hotel as well as information regarding their return trip.

The group was instructed that upon arrival at the bus station at Rome Termini, they would enter the station and in passing through en route to their hotel, they would confirm their return schedule and email me the details. (In our departure conversation, we emphasized that they should check the return schedule because they would have to transfer trains on their return at the city of Terni, about 45 minutes drive from Monte Castello and the small train line to Monte Castello provided limited service in the late night hours.) I told them quite specifically about ICA's policies regarding off-campus travel and they were clear that if they could not make their connection, they would remain in Terni overnight.

Nonetheless, they failed to check the schedule and did not look into the departure times of the connecting train until they reached Terni. As a result, the group was stranded at Terni on Saturday night. They informed me by phone that they had missed the train at approximately 8:00 PM. As per our discussion, I told them that they had two options:

1. Stay at a hotel in Terni and continue on the next day
2. Our driver could pick them up at Terni for €20 per person. (The payment is made directly to our driver, Carlo Innocenti and is a very reasonable rate.)

They decided to stay in Terni and continue on the next day. Later that night however, I received two emails from Allison that I found most inappropriate in tone and disrespectful. I have forwarded these messages to you. In summary, she indicated her frustration that I was not willing to pick them up in Terni after 9:00 PM (a 45minute drive each way, door to door. I calculate an additional 15 minutes on each end for loading and traffic and thus this represents a two – hour drive.) Allison appeared incensed that I refused to do so. In fact, she sent me a message that I felt to be quite sarcastic in tone, accompanied by driving maps and driving times (to show me how simply I might have gotten there to pick them up apparently). The fact that she failed to calculate the round-trip time is in my estimation significant. She also suggested that they might have taken a bus to the nearby town of Todi, which arrived at about 1:00 AM and that I should pick them up there when it arrived. I did not reply to the latter.

It came as a great surprise and concern to me that in the course of her correspondence on the above matter, Allison also revealed to me that she was an epileptic and subject to severe migraines. She had never expressed this to me before that point.

On Sunday, the group contacted me, indicating that they would arrive at the nearby Fratta Todina station at 2:00 PM. With this objective in mind, I drove to the station and waited for over an hour before I received a call on my cell indicating that they had again missed their train and that they would arrive at 4:00 PM. Since I had business in Perugia I drove there and returned to Fratta just after 4:00.

Unfortunately, instead of waiting, Allison insisted on walking up the hill to Monte Castello (45 minutes in good weather). Regrettably, they did not contact me with this plan change and proceeded up the hill. At the train station meanwhile, I waited for over an hour before she became fatigued with her walk and insisted that the other students call me.

Approximately half-way in their path up our mountain, I received a call from one of the students asking us to pick them up. Since we were at the nearby train station, we arrived quickly. Upon locating the group at the side of the road we pulled over and parked. I told the group that before proceeding further we needed to discuss the situation with their weekend travel and

the fact that I had spent several hours driving around looking for them. Allison complained that they could not reach me by phone, and thus could not contact me. This is strange since my phone was working and I was receiving calls. My call log showed no missed calls or messages, nor did I receive any email correspondence from them, save Allison's emails of complaint I described earlier. The latter clearly had no difficulties finding me. All three students travelling together had working cell phones.

I spoke to the group (then gathered in a parking area on the roadside) firmly and clearly about the situation. No one present expressed concerns about my tone or language, although I was understandably angry at the situation. As their supervisor, I notified the group that before proceeding up the hill we needed to have a discussion about policies and about hotels. I also told Allison that her tone in the emails was unacceptable and that if she did not change her behavior that we had no recourse but to tell her to pack her bags and go to the hotel next door for the remainder of her stay. She became incensed at this and told me:

"I am about to get mad!" She then stormed off and sat on the guardrail about 20 feet from where we were parked. Feeling concern for her safety and that of the group, I instructed the other students to get in the car. I got in the car as well and asked my assistant Alexandra to speak to her and convince her to get in the car and ride up to the village with us and to further inform Allison that she (Alexandra) would accompany her to the school while she packed her bags and then would accompany her to the hotel in order to make sure she was able to check in. We waited without moving the car for about twenty minutes while Alexandra spoke to her.

Alex returned to the car to inform me that Alison was quite agitated and that she refused to get in the car. After waiting for another ten minutes while Alex spoke to her a friend from the village drove by and Alex asked him to drive Allison up to the village. Allison accepted and they drove together to Monte Castello.

Upon reaching Monte Castello, Alexandra accompanied Allison, attempting to calm her down. In the course of the next hour or so, Allison telephoned her mother while Alexandra was present and Allison's mother asked to speak to her as a representative of ICA. I did not witness this, however Alexandra reported to me that Allison's mother was hostile and raised her voice to a level at which it made it necessary for Alexandra to inform the mother that if she did not moderate her tone, she would terminate the call. In the course of her conversation, Alexandra attempted to assure the mother that everything was safe, but that given the situation however, that we were well within our rights to insist that Allison leave the premises and move to the hotel if she did not moderate her behavior.

Ultimately, Allison returned to the ICA premises assuring Alex that she would moderate her tone. Allison chose to remain in her room for the remainder of the night. We sent dinner for her to her room.

The next morning, I asked Allison to come to the office (while I was accompanied by our manager, Eros Tassi) and I attempted to explain our position and policies. Allison almost immediately became confrontational and indicated that she did not work for me and that regardless of what others thought the parameters of the situation to be, she did not share the perception that she should be required to do manual labor. She indicated that she did not feel comfortable talking to me and that she was going to her room. When my assistant Alexandra arrived, I asked her to speak to Allison and try to reason with her.

However in going to her room, Alexandra reported that Allison refused to speak to her and had locked herself in her room. She remained in this situation for a couple hours. Out of concern with the situation, I contacted our attorney, Alex Bonta in order to get advice on how to address the situation within the parameters of Italian law. Alex advised me that if Allison refused to leave the room and was not responding, I should contact the local police and ask them to address the situation. This became unnecessary however when Allison came downstairs from her room.

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After speaking with you on the phone, I informed Allison that I felt that the best situation for her would be to continue to stay in our facilities for the remainder of her trip, without the obligation to work. I advised her that she could take her meals at the hotel at her own expense. She seemed quite comfortable with the situation and returned to her room. A short while later I received a phone call from you indicating that USC would book a ticket for Allison and that she had chosen to leave early. As you know we arranged a hotel room for her and provided transport the next morning. She arrived at FCO by 8 AM.

I hope that the above will help in understanding more clearly the situation.

Statement from W1

My name is Alexandra Stasko and I am writing to you because I am greatly bothered by events that have taken place here at the International Center or the Arts, where I am currently working as an assistant for my former professor, David Voros. I am compelled to write this email because I feel that my perspective on the situation may be of use when figuring out what has transpired. These events involving Allison Dunavant are baffling. However, in the days that I have observed her behavior I am not surprised at how immaturely she has handled the situation.

From the first day I arrived I immediately noticed how unsatisfactory her performance was as a worker, especially when compared with the other two assistants and myself. This is my second summer here in Monte Castello and I am very familiar with the expectations of this position and the operations of the school. There were many instances in which Allison would slack off, refuse to complete certain tasks and play on her phone incessantly. She also missed a whole day of work because she drank more alcohol than she should of consumed. You can imagine how frustrating this was to myself and the other assistants when we were all in this together to work and reap the incredible benefits of our situation. The opportunity to stay for an extended time in Italy, be accommodated and fed wonderfully and to be able to work in a private studio space is something that I will always be grateful for. It was perfectly understood that I would be working in exchange for this privilege.

To see Allison be unappreciative and not uphold her end of the bargain was very irritating on a personal level.

When the situation occurred where Allison and the two other assistants missed their train I believe David acted in a reasonable and in a professional manner. I want to stress that I wholeheartedly support his actions. I have had many supervisors who would not have tolerated a fraction of what Dave has tolerated in regard to her behavior. After Allison's blatant disrespect to his face, refusal to admit to any fault in the situation and her childish reactions I believe having her sent back home was the best move for everyone. If you have any questions or would like more detailed information, please feel free to contact me.

Statement from W2

My name is [REDACTED] and I'm currently writing to you from Monte Castello, Italy. I just wanted [REDACTED] to inform you of my experience in regards to the recent incident involving a fellow USC grad student and my Painting professor and employer, David Voros. As you already know, Allison Dunavant has decided to leave earlier than her original departure date, May 22, 2016. Like Allison, I purchased a round trip from Myrtle Beach, South Carolina to Rome, Italy, Leonardo da Vinci Intl Fiumicino (FCO). Prior to leaving the United States, David asked [REDACTED] Allison Dunavant, and myself to join him for a group meeting in [REDACTED] in dates, times, meals, and work-load expectations. The four of us were informed of our daily tasks, which average out to be about five hours a day. Since our arrival, we have worked Monday through Friday from about 10:00 am until 3 pm. Sometimes longer and

sometimes shorter, depending on how long it takes us to cook breakfast and lunch. Nevertheless, we have maintained a healthy work schedule and have been provided with ample amounts of food. David has been extremely gracious in providing us with exotic meals, personal studios, art supplies, free travel, and trips to several extraordinary locations. In addition to our work, we have been able to travel to Todi, Assisi, Perugia, and Rome, all of which transportation was free. We've also had the privilege of meeting and dinnning with two well-known American artists, Alan Feltus and Lani Irwin. They were so incredibly humble, and I must say that we simply wouldn't have been to meet such amazing people if it weren't for David. I can't stress how appreciative I am for this opportunity here in Italy with a wonderful group of friends and an incredibly passionate professor. I hope that this letter finds you well and that my writing helps shed light on the situation as a whole. Thank you so much for your time.

Statement from W3

Hello Mr. Miller

My name is [REDACTED] I'm currently an undergrad at USC pursuing my BFA in studio painti [REDACTED] write to you concerning an incident in which my peer [REDACTED] n Dunavant I feel acted ill-tempered toward Professor David Voros. Before me, [REDACTED] and Allison traveled to Italy David explained materials to bring, various tasks we [REDACTED] w d work on throughout the building/studios for 5 hours a week, possible time for us to go places ourselves on weekends, and furthermore explained rules/safeties of the University. We agreed to the University rules, and decided to work more hours to get done faster to go on more trips.

This incident occurred after we came back from a trip to Rome. No complaint was made from Allison until the moment we missed our train connections, thus having to spend the night in Terni. What was explained from David before our parting to Rome was upon this break if we went to Rome it was important to check train times so we would be back on time to catch the train to Fratta Todina. At this location he would be able to pick us up. If we missed that train then we would have to spend the night. Which none of us had a problem doing, and agreed to spend the night if we missed our train. In no way I feel our safety was in jeopardy during our stay in Monte Castello, or during our trip to Rome and back. Communication was no problem either by phone or email.

Allison felt as if David was obligated to pick us up after we missed numerous trains. She chose to voice her opinion through negative emails, and actions toward David at our stay in Terni. Before planning our trip to work with David we talked what needed to be done as far as work, how fortunate an opportunity this was, and paintings/sculptures we would see amongst each other. With David's help he provided full funding to pay for my ticket, providing food for us constantly, reassuring rules, making sure to provide materials we didn't bring, and making sure we remained happy.

I felt as if I could help with some understanding since I was 1 of 3 to participate in this situation, also having spent time with Allison to know her attitude.

III. KEY FACTUAL CONSIDERATIONS

While the Complainant alleges that she is the recipient of a series of inappropriate incidents and behavior committed by Charged Party, the Office of Equal Opportunity Programs only has jurisdiction for allegations of violations based upon protected class status, in this instance gender. The central complaint of gender-based discrimination is based upon Complainant's assertion that she was treated differently resulting from her gender and that she was subjected to inappropriate gender-based language that was harassing. Complainant's asserts that Charged Party referred to her a "B***h" on at least one occasion.

IV. QUESTIONS CONSIDERED DURING ANALYSIS OF EVIDENCE

To assess whether it is more likely than not that Complainant has been subjected to gender based discrimination and harassment, EOP will review all reports and evidence in light of the following policy definitions:

Discrimination

Discrimination is the unfair or unequal treatment of an individual or a group based upon race, color, national origin, religion, sex, gender, age, disability, sexual orientation, genetics, veteran status, or any other category protected by law, that interferes with or limits the ability of an individual or group to participate in or benefit from the services, activities, or privileges provided by the University.

Harassment

Harassment is a specific type of illegal discrimination. It includes conduct (oral, written, graphic, or physical) which is directed against any student or group of students because of or based upon one or more of the characteristics articulated in Section II above, that is sufficiently severe, pervasive, or persistent so as to interfere with or limit the ability of an individual or group to participate in or benefit from the programs, services, and activities provided by the University. Such harmful conduct may include, but is not limited to, objectionable epithets, demeaning depictions or treatment, and threatened or actual abuse or harm. Harassment does not include the use of materials by students or discussions involving students related to any characteristic articulated in Section II for academic purposes appropriate to the academic context.

The questions in this matter are as follows:

- Is it more likely than not that the Complainant was subjected to gender-based harassment?
- Is it more likely than not that Complainant was subjected to gender-based discrimination?
- Is the evidence in support of the claim of harassment and discrimination weightier than the evidence against the claim?
- Did the Charged Party use the word "B***h" in referring to the Complainant?
- Does the use of a single gender-based expletive constitute harassment?

V. ANALYSIS

Based upon our review of statements from the Complainant, the Charged Party, and the witnesses, there is not sufficient evidence that it is more likely than not that C was treated different from the other participants based upon her gender. Further, C contends that Charged Party referred to her as a "B***h". Charged Party disagrees and states that while he does not remember referring to C as a "B***h" he may have said on one occasion that she was acting "B***hy". None of the witnesses report or confirm they heard Charged Party used expletives towards Complainant. Finally, EOP must conclude that if Charged Party referred to Complainant as "B***hy" it was certainly inappropriate but does not rise to the legal level of harassment or discrimination. A single use of the expression is neither pervasive nor severe.

VI. CREDIBILITY ASSESSMENT

The Office of Equal Opportunity Programs has not discovered any information or evidence that adds to or takes away from the credibility of either of the parties.

VII. INVESTIGATIVE FINDINGS

In this case, using the preponderance of evidence standard, there is not sufficient evidence that Complainant was "more likely than not" subjected to harassment or discrimination as defined by EOP 1.03 or STAF 6.24; or any violations of the "Student Non-Discrimination and Non-Harassment Policy" as stated in (STAF 6.24), perpetrated by the Charged Party.

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VIII. DETERMINATION

Based upon the EOP Office's investigation of this matter, the totality of the circumstances and the information obtained pursuant to this investigation, the EOP Office concludes that there is "NO REASONABLE CAUSE" to find against the Charged Party in this case for violation of the University of South Carolina's "Discriminatory Harassment Policy" (EOP 1.03), the "Student Non Discrimination Policy"(STAF 6.24), or any other aspect of the University policies pertaining to discrimination and harassment.

IX. RECOMMENDATIONS

Based upon EOP's discovery and review of statements provided by Complainant and Charged Party, we conclude that this trip was not registered as an official University of South Carolina study abroad experience. The trip was a personal venture planned, supervised, and executed by Charged Party independent of University of South Carolina Study Abroad policies and procedures; therefore, EOP recommends that the Office of Compliance and Risk Management meet with Charged Party to ensure that the arrangements and jurisdiction of any such future project is clarified.

X. CONCLUSION

Please be advised that if you are dissatisfied with this decision, you can file with the Office of Civil Rights of the United States Department of Education or the Civil Rights Division of the United States Department of Justice. In addition, you may request a presidential appeal through the Office of General Counsel or the Office of the President.

We note that a Letter of Determination and finding shall be presented to the Complainant and the Charged Party as well as those University Officials who have a need to know. This concludes the USC Equal Opportunity Programs' review of this matter and investigation.

Submitted to the Title IX Coordinator for review by,



Carl R. Wells Asst. Dir. EOP

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Office of Equal Opportunity Programs

Dunavant v. Voros



Equal Opportunity Programs

September 15, 2016

Allison Dunavant
 2190 Liberty Cir
 Little River, SC 29566-9103

**PERSONAL AND
 CONFIDENTIAL**

Regarding Case Number: 2015021301

RE: Allison Dunavant, *Complainant* v. David Voros, *Charged Party*
 Case Number: 20150213

**LETTER OF DETERMINATION
 CASE NUMBER 20150213
 CONFIDENTIAL**

DATE: September 15, 2016

TO: Title IX Coordinator

FROM: Carl R. Wells, Asst. Dir. - EOP RE: Case # 20150213

I. INTRODUCTION AND BACKGROUND

This confidential investigative report addresses allegations of violations of the USC 'Discriminatory Harassment' and 'Student Non-Discrimination and Non-Harassment' Policies (EOP 1.03 and STAF 6.24). This complaint was filed by Allison Dunavant, a student at University of South Carolina at the time of the alleged incident. Asst. Dir. EOP, conducted the investigation into these allegations. The USC EOP Office is charged with the investigation and review of the charges as filed and the issuance of a letter of determination pursuant to applicable University policies. This report shall be shared only with university officials who have a need to know.

A. Involved Parties

- Complainant: Allison Dunavant, Race: Not Hispanic or Latino; WH, Gender: Female, Classification: Graduate, Major: Art Studio
- Charged Party: David Voros, Race: White, Gender: Male, Classification: Professor, Major: Art Studio

An Equal Opportunity Institution

- Witness 1 (Hereinafter referred to as "W1": Alexander Stacko, Race: White, Gender: Male, Classification: Graduate Student, Major: Art Studio)
- Witness 2 (Hereinafter referred to as "W2": [REDACTED], Race: White, Gender: Male, Classification: Graduate Student, Major: [REDACTED])
- Witness 3 (Hereinafter referred to as "W3": [REDACTED] Race: Black, Gender: Male, Classification: Undergraduate Art Studio)

B. Jurisdiction

Pursuant to STAF 6.4 and EOP 1.03, the USC EOP Office is charged with the investigation and review of the charges as filed and the issuance of a letter of determination. This report shall be shared only with university officials who have a need to know.

C. Alleged Violations/Jurisdiction:

The Charged Party were given a verbal Notice of Investigation (NOI) on . The NOI informed the Charged Party that an investigation was being conducted by the University, on behalf of the Complainant. The NOI covered possible violations of the following University policies:

1. EOP 1.03 entitled "Discriminatory Harassment Policy" -- Gender Discrimination
2. STAF 6.24 entitled "Student Non-Discrimination and Non-Harassment Policy"

The Charged Party was given written Notice of Investigation (NOI) on March 3, 2016 and again on June 9, 2016. The NOI informed the Charged Party that an investigation was being conducted by the University, on behalf of the Complainant. The possible violations to be discussed regarded the following University policies:

(Section B Definition of Prohibited Conduct)

Staf 6.24 Student Non Discriminatory Harassment and EOP 1.03

1. Discrimination

Discrimination is the unfair or unequal treatment of an individual or a group based upon race, color, national origin, religion, sex, gender, age, disability, sexual orientation, genetics, veteran status, or any other category protected by law, that interferes with or limits the ability of an individual or group to participate in or benefit from the services, activities, or privileges provided by the University.

2. Harassment

Harassment is a specific type of illegal discrimination. It includes conduct (oral, written, graphic, or physical) which is directed against any student or group of students because of or based upon one or more of the characteristics articulated in Section II above, that is sufficiently severe, pervasive, or persistent so as to interfere with or limit the ability of an individual or group to participate in or benefit from the programs, services, and activities provided by the University. Such harmful conduct may include, but is not limited to, objectionable epithets, demeaning depictions or treatment, and threatened or actual abuse or harm. Harassment does not include the use of materials by students or discussions involving students related to any characteristic articulated in Section II for academic purposes appropriate to the academic context.

D. Standard of Proof:

In order to determine that a student has violated the Code of Conduct, the University's Student Non Discrimination Policy, STAF 6.24, provides that the standard of proof required is a preponderance of evidence, i.e., the evidence demonstrates that it is more likely than not that the conduct occurred. Preponderance of evidence means evidence which, when fairly considered, is more convincing as to its truth than the evidence in opposition. This standard is

often referred to as "50% plus a feather." In determining whether there is reasonable cause to believe that illegal discrimination or harassment occurred, the EOP Office utilizes the preponderance of evidence standard.

History of Case

Date incident was reported to the Office of Equal Opportunity Programs: May 16, 2016

Date Incident occurred: May 1, 2016

Date the EOP Office opened this case: May 23, 2016

Date of the EOP Hearing: May 23, 2016

Date the case was closed: September 15, 2016

Case assigned to: Carl R. Wells, Asst. Dir. - EOP

Hearing type: The initial hearing type was mediation. When the mediation failed (both parties were not willing to agree to the terms), EOP then conducted a formal investigation. Please note that this case has been opened for several months because when the incident was initially reported both parties were out of the country. After C returned to the US, Charged Party was still out of the country throughout the summer months. In addition, the first attempt to mediate the situation failed.

II. Case Summary:

The Complainant alleges that during the course of an International trip sponsored and coordinated by the C, she was subjected to gender harassment and bullying by C. As indicated later, the trip in question was not approved, sanctioned, or supervised by the University of South Carolina and did not go through the University's study abroad approval process.

III. KEY FACTUAL CONSIDERATIONS

While the Complainant alleges that she is the recipient of a series of inappropriate incidents and behavior committed by Charged Party, the Office of Equal Opportunity Programs only has jurisdiction for allegations of violations based upon protected class status, in this instance gender. The central complaint of gender-based discrimination is based upon Complainant's assertion that she was treated differently resulting from her gender and that she was subjected to inappropriate gender-based language that was harassing. Complainant's asserts that Charged Party referred to her a "B***h" on at least one occasion.

IV. QUESTIONS CONSIDERED DURING ANALYSIS OF EVIDENCE

To assess whether it is more likely than not that Complainant has been subjected to gender based discrimination and harassment, EOP will review all reports and evidence in light of the following policy definitions:

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The questions in this matter are as follows:

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- Is it more likely than not that Complainant was subjected to gender-based discrimination?
- Is the evidence in support of the claim of harassment and discrimination weightier than the evidence against the claim?
- Did the Charged Party use the word "B***h" in referring to the Complainant?
- Does the use of a single gender-based expletive constitute harassment?

V. ANALYSIS

Based upon our review of statements from the Complainant, the Charged Party, and the witnesses, there is not sufficient evidence that it is more likely than not that C was treated different from the other participants based upon her gender. Further, C contends that Charged Party referred to her as a "B***h". Charged Party disagrees and states that while he does not remember referring to C as a "B***h" he may have said on one occasion that she was acting "B***hy". None of the witnesses report or confirm they heard Charged Party used expletives towards Complainant. Finally, EOP must conclude that if Charged Party referred to Complainant as "B***hy" it was certainly inappropriate but does not rise to the legal level of harassment or discrimination. A single use of the expression is neither pervasive nor severe.

VI. CREDIBILITY ASSESSMENT

The Office of Equal Opportunity Programs has not discovered any information or evidence that adds to or takes away from the credibility of either of the parties.

VII. INVESTIGATIVE FINDINGS

In this case, using the preponderance of evidence standard, there is not sufficient evidence that Complainant was "more likely than not" subjected to harassment or discrimination as defined by EOP 1.03 or STAF 6.24; or any violations of the "Student Non-Discrimination and Non-Harassment Policy" as stated in (STAF 6.24), perpetrated by the Charged Party.

VIII. DETERMINATION

Based upon the EOP Office's investigation of this matter, the totality of the circumstances and the information obtained pursuant to this investigation, the EOP Office concludes that there is "NO REASONABLE CAUSE" to find against the Charged Party in this case for violation of the University of South Carolina's "Discriminatory Harassment Policy" (EOP 1.03), the "Student Non Discrimination Policy"(STAF 6.24), or any other aspect of the University policies pertaining to discrimination and harassment.

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IX. RECOMMENDATIONS

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Based upon EOP's discovery and review of statements provided by Complainant and Charged Party, we conclude that this trip was not registered as an official University of South Carolina study abroad experience. The trip was a personal venture planned, supervised, and executed by Charged Party independent of University of South Carolina Study Abroad policies and procedures; therefore, EOP recommends that the Office of Compliance and Risk Management meet with Charged Party to ensure that the arrangements and jurisdiction of any such future project is clarified.

X. CONCLUSION

Please be advised that if you are dissatisfied with this decision, you can file with the Office of Civil Rights of the United States Department of Education or the Civil Rights Division of the United States Department of Justice. In addition, you may request a presidential appeal through the Office of General Counsel or the Office of the President.

We note that a Letter of Determination and finding shall be presented to the Complainant and the Charged Party as well as those University Officials who have a need to know. This concludes the USC Equal Opportunity Programs' review of this matter and investigation.

Submitted to the Title IX Coordinator for review by,



Carl R. Wells Asst. Dir. EOP