Important Contacts

Call 9-1-1 to report any emergency

Dr. Cathy Maxwell-Ryan
President
303-529-0284
Veronica Pantoja
Director of Human Resources and Title IX Coordinator
- **818-785-2726 ext. 223**

Brett Hughes
Operations Manager
- **303-848-6066**
- **480-669-0431**

Rose Jaramillo Hoyle
Asst Director of Admission
- **800-270-5052**

Annual Security Report 2025

Casa Loma College

Reporting Period 2024

Aurora, CO

MESSAGE FROM THE PRESIDENT

We at Casa Loma College are committed to providing a safe campus environment and ask that everyone takes ownership of this goal. Casa Loma College has recently undertaken many important institutional efforts to address safety and crime prevention, including this publication.

No one can predict where and when an emergency will occur. Therefore, each of us has a role in maintaining a secure environment and a responsibility to be prepared to act appropriately during an emergency.

Our goal at the College is to work with all community members to improve our preparedness and readiness for incidents and emergencies. When we are prepared, we can protect ourselves and others while also implementing precautions to prevent incidents from occurring. I invite you to read this Annual Security Report to familiarize yourself with our safety procedures and initiatives. Together we can keep Casa Loma College safe for everyone.

Stay Safe,

Scott Sand, Ph.D.
President

TABLE OF CONTENTS

Message From The President **2**
Introduction **4**
Our Facilities and Location **4**
The Annual Report **4**
Campus Security Authority **5**
Law Enforcement 5
Campus Security Authorities 5
Safety and Security Awareness Education **6**
Reporting a Crime or Emergency **7**
confidential Reporting 7
Anonymous Reporting 8
Security Of And Access To College Campus **8**
Clinical and Externship Sites 9
Daily Crime Log 9
Timely Warning Notices **10**
Public Safety Notice 10
Summary of Emergency Response and Evacuation Procedures **11**
General Evacuation Procedures 12
Drug and Alcohol Abuse Prevention Program **13**
Drug, Cannabis and Alcohol Policies 13
Cannabis Policy 13
Tobacco and E-Cigarette Policy 14
Sanctions 15
Federal Offenses 15
Drug Classification Schedules 16
Health Risks of Alcohol and Other Drugs 17
Drug and Alcohol Assistance and Resources 19
Prevention 19
Sexual Misconduct and Harassment Prevention Policy **20**
Appendix A: Definitions of Crime Categories **40**
Appendix B: Definitions of Geography **43**
APPENDIX C: Definitions of Reporting Methods **43**
Appendix D: Crime Statistics **44**

INTRODUCTION

The Jean Cleary Disclosure of Campus Security Policy and Campus Crime Statistics Act, codified at 20 USC 1092 (F) as a part of Higher Education Act of 1965, is a federal law that requires colleges and universities to disclose certain timely and annual information about campus crime and security policies. All public and private institutions of postsecondary education participating in federal student aid programs are subject to this act.

The Clery Act, originally enacted by Congress and signed into law by President George Bush in 1990 as the Crime Awareness and Campus Security Act of 1990, was championed by Howard and Connie Clery after their daughter Jeanne was murdered at Lehigh University in 1986. They also founded the non-profit agency Security on Campus, Inc. in 1987. Amendments to the Act in 1998 renamed it in memory of Jean Clery. The Clery Act was revised under the Higher Education Opportunity Act (HEOA) of 2008.

Beginning on July 1, 2010, the Clery Act requires colleges and universities to have emergency response and evacuation procedures in place. Institutions must include a summary of the emergency response procedures in their annual security report.

OUR FACILITIES AND LOCATION

Casa Loma College is located at 3015 S Parker Rd, Aurora, CO 80114. The campus includes one building maintained by the College for instructional and staff purposes. There is also a large parking lot. The College has no on-campus housing or College-owned, operated, or maintained off-campus housing. Classes are conducted on our campus and through distance education. Clinical practicum is conducted off-site at pre-determined locations throughout Colorado. Emergency services to any off-site location will be provided by the closest local authorities.

THE ANNUAL REPORT

The Annual Security Report contains information regarding campus security and personal safety including topics such as crime prevention, Campus Security Authority, crime reporting policies, policies related to and programs to prevent sexual assault and other crimes, disciplinary procedures and other matters of importance related to security and safety on campus. The report also contains information about crime statistics for the three previous calendar years concerning reported crimes that occurred on campus; in certain off-campus buildings or property owned or controlled by Casa Loma College; and on public property within, or immediately adjacent to and accessible from the campus.

Casa Loma College Director of Compliance is the designated Clery Compliance Officer and is responsible for the preparation and distribution of the Casa Loma College Annual Security Report. The statistics are compiled from campus incident reports, reports from designated Campus Security Authorities and from the local Aurora Police Department . This data is

reported to the United States Department of Education via an annual web-based data collection. On or before October 1st of each year an e-mail notification is made to all enrolled students and employees that provides the website link to access this report. Prospective students and employees are also notified of the report's availability. Hard copies of the report may also be obtained at no cost by contacting Veronica Pantoja, Director of Human Resources at veronica.pantoja@casalomacollege.edu.

For students, employees and prospective students and employees, the annual security report is located on the College's website at Public Disclosures - Casa Loma College.

CAMPUS SECURITY AUTHORITY

LAW ENFORCEMENT

While the College does not have any written agreements with local law enforcement agencies, it does maintain a close working relationship with local police. In extreme emergencies, the Campus Director or designated CSA will contact the Aurora Police Department to assist.

Aurora Police Department 15001 E Alameda Pkwy Aurora, CO 80012 303-739-6000	**Aurora Fire Rescue Headquarters** 15151 E Alameda Pkwy, Suite 4100 Aurora, CO 80012 720-989-2000

CAMPUS SECURITY AUTHORITIES

The College has designated certain officials to serve as Campus Security Authorities (CSA). Campus Security Authorities are federally mandated crime reporters for the College and are required to report Clery reportable crimes to the Director of Human Resources for data gathering and/or campus warning and will if requested to do so, protect personally identifiable information to the extent permitted by law and College policy and that pursuant to Title IX of the Education Amendments of 1972 (Title IX),they are required by federal law and College policy to promptly notify the College's Title IX Coordinator of all reported incidents of sexual assault, dating violence, domestic violence, and stalking involving members of the College community, regardless of geographic location

Casa Loma College does not have a police nor security office. Casa Loma College has designated the following personnel as Campus Security Authorities:

Dr. Cathy Maxwell-Ryan, Campus Director Cathy.m.ryan@casalomacollege.edu 303-529-0284	**Brett Hughes** Operations Manager Brett.hughes@casalomacollege.edu 303-848-6066

Rose Jaramillo Hoyle Asst Director of Admission Rose.j.hoyle@casalomacollege.edu 800-270-5052	**Christy Ruoff, Senior Director of Student Financing/Financial Aid** Christy.ruoff@casalomacollege.edu 818-785-2726 ext. 205
Veronica Pantoja, Director of Human Resources/ Title IX Coordinator veronica.pantoja@casalomacollege.edu 818-785-2726 ext. 223	**Cyrill Reiser, Online Security** cyrill.reiser@casalomacollege.edu 818-785-2726 ext. 216

SAFETY AND SECURITY AWARENESS EDUCATION

Casa Loma College is dedicated to educating the college community about safety procedures, crime prevention, substance abuse and sexual assault prevention. Campus Security Authorities are committed to protecting life and property on campus and inform the college community of the individual responsibility to take necessary steps to protect themselves including:

- Lock your car and remove valuables from plain view.
- Have your keys ready when you approach your car.
- Take a moment to look in your car before entering
- Be aware of events that may affect your safety on campus.
- Walk with a friend or a group.
- Take notice of your surroundings.
- Take notice of the locations of building exits.
- Protect your identity. Keep paperwork, identification cards, credit cards and passwords confidential.
- Report suspicious activity or make suggestions concerning safety to the Campus Security Authorities.

Casa Loma College offers a program designed to inform students and employees about campus safety and security procedures and practices and the prevention of crimes. The program includes general crime prevention and security awareness with discussions on topics about drug and alcohol abuse, sexual assault awareness and prevention relationship violence awareness and prevention, and bystander intervention.

In addition, students and employees are provided information regarding emergency response and evacuation procedures during program/employee orientation.

REPORTING A CRIME OR EMERGENCY

In the event of an emergency, call 911.
All members of the Casa Loma College community and all visitors are encouraged to report potential criminal activity, suspicious behavior, and any emergencies accurately and promptly on campus or on public property running immediately adjacent to the campus, to the Campus Security Authority.

Casa Loma College requests and encourages students, faculty and the college community who witness, or are victims of a crime, to make a report. In the case of an emergency, students, faculty, and associates are encouraged to dial 9-1-1. Casa Loma College is required to report all criminal activity occurring on campus, at non-campus facilities, property owned or controlled by Casa Loma College, and on public property within, or immediately adjacent to, and accessible from the campus.

Members of the community are helpful when they immediately report crimes or emergencies to one of the CSA's identified above.

Crimes should be accurately and promptly reported to the CSA or the appropriate police agency when the victim of a crime elects to, or is unable to, make such a report. If the victim or witnesses choose to report the crime on a voluntary and confidential basis, they can do so by anonymously by going to the Incident Reporting Form at https://casalomacollege.edu/registrar-student-services/forms-files-for-download/, calling the Front Desk at (818) 785-2726 or contacting a CSA as identified above.

In cases where there is an allegation of criminal conduct or violations of the Student Code of Conduct, the CSA will forward copies of the report and any supplemental information learned during an investigation to the Director of Student Affairs. Offenses involving sexual violence, domestic or dating violence, stalking, sexual harassment, or similar behaviors will be reported to the Title IX Coordinator, Veronica Pantoja, at veronica.pantoja@casalomacollege.edu or (818) 785-2726 ext. 223, for review and possible action. Reporting crimes expeditiously to the CSA and/or the Title IX Coordinator will aid the College in providing timely warning notices to the community, when appropriate.

Casa Loma College does not have any pastoral or professional counselors on campus, as a result, the College does not have any procedures to encourage pastoral or professional counselors to inform the persons of any procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics.

CONFIDENTIAL REPORTING

If you are the victim of a crime and do not want to pursue action within the College or the criminal justice system, you may still consider making a confidential report. With your permission, in certain circumstances, a member of Campus Safety and Security Team or the Title IX Coordinator can file a report as to the details of the incident without revealing your identity. The purpose of a

confidential report is to comply with your wish to keep the matter confidential, while taking steps to ensure the future safety of yourself and others. With such information, the College can keep an accurate record of the number of incidents involving students, employees, and visitors; determine where there is a pattern of crime regarding a particular location, method, or assailant; and alert the campus community to potential dangers. Reports filed confidentially ~~are~~ counted and disclosed in the annual crime statistics for the institution.

When a report involves allegations of sexual harassment (including sexual violence) it will be reported to the College's Title IX Coordinator. Reporting procedures applicable to allegations of sexual misconduct are further discussed later in this report.

Members of the College can also report an incident by going to the Incident Reporting Form at Casa Loma College Incident Report Form. Filling and out submitting the form will initiate a member of the CSA and/or Title IX Coordinator to investigate the complaint.

ANONYMOUS REPORTING

The College allows faculty, staff, and students to report incidents anonymously, which allows a person reporting to complete a report without providing any personal identifying information, Anonymous reporting can be accomplished using the online Incident Reporting Form located on the website at: Casa Loma College Incident Report Form.

While anonymous reporting is available by these means, the College's ability to investigate and appropriately address allegations of misconduct will be significantly limited. The purpose of an anonymous report is to possibly take steps to promote safety. In addition, Casa Loma College can keep an accurate record of the number of incidents involving students, determine where there is a pattern of crime regarding a particular location, method, or assailant, and alert the campus community to potential danger. Reports filed in this manner are counted and disclosed in the annual crime statistics for the college.

SECURITY OF AND ACCESS TO COLLEGE CAMPUS

Campus administrators are responsible for determining access rights and hours. The campus facilities are typically open and accessible to students, employees, guests, and visitors during normal building hours and into the evening hours, depending on class and activity schedules. In general, the building and parking areas are secured after the last class in the building ends, although some administrative offices are secured after normal business hours.

A security guard patrols the campus in the evening and is responsible for reporting crimes, responding to medical emergencies, reports of fire, as well as any other incident requiring CSA assistance.

Facilities and landscaping are maintained in a manner that minimizes hazardous conditions. CSA's regularly patrol the campus and report malfunctioning lights and other unsafe conditions

to the Campus Director for correction. Employees should report potential safety hazards to the Campus Director or designee.

Several College personnel are on call after normal business hours and on weekends to respond to emergency situations involving College facilities.

Casa Loma College requires that all students, staff, and faculty wear their college identification badge while on campus.

CLINICAL AND EXTERNSHIP SITES

Students assigned to Clinical or Externship Sites are typically provided with the facilities safety management plan and phone numbers to call in case of emergency or concern.

DAILY CRIME LOG

Criminal incidents or alleged criminal incidents reported to a CSA are recorded in the daily crime log and are available upon request from the front desk. The crime log contains a record of all crimes reported that occurred on campus, at non-campus facilities and property owned or controlled by Casa Loma College and on public property within, or immediately adjacent to, and accessible from the campus.

Information will be withheld from the Daily Crime Log if there is clear and convincing evidence that release of the information would jeopardize an ongoing criminal investigation, the safety of an individual, cause a suspect to flee or evade capture, or result in the destruction of evidence. Only the information necessary to avoid potential adverse effects will be withheld. The information withheld will be released once the adverse effect previously described is no longer likely to occur. The crime log includes nature (classification), date, time reported, and date and time the crime occurred or allegedly occurred. The crime log also contains the general location of the reported crime and disposition of the crime, if known.

TIMELY WARNING NOTICES

If a situation arises, either on- or off-campus, that, in the judgment of Casa Loma College leadership constitutes an ongoing or continuing threat, a campus-wide "timely warning" will be issued. The warning will be issued primarily through a blast email to all students and employees as soon as pertinent information is available. Alerts can also be sent/communicated via text message or voice message to students cell phones and a variety of other notification methods such as postings to the college's social media accounts - Casa Loma College website https://casalomacollege.edu/, Instagram: Casa Loma College (@casalomacollege) Facebook: https://www.facebook.com/CasaLomaCollege/, and Twitter: Casa Loma College (@casalomacollege) / Twitter.

In the event of a significant emergency or dangerous situation, the Campus Director or designee will without delay, and taking into account the safety of the community, initiate the emergency notification protocol, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

Subsequent messages and updates will be coordinated through Emergency Command Center upon activation by the Campus Director or designee.

Important Note: Changes in contact information including cell phone numbers must be reported to the appropriate office in order to maintain the ability to receive emergency messages. Casa Loma College is not liable for students, faculty and staff who do not keep their contact information current in the student information system or with the Human resources department.

The decision to issue an alert is made, without delay, on a case-by-case basis in consideration of all the factors surrounding an incident. These factors include, but are not limited to, the nature of the crime, the nature of a continuing threat to the campus community, whether a report of the crime is received in a timely manner and mitigating any risk of compromising law enforcement efforts.

Anyone with information warranting a timely warning should report the circumstances to the CSA.

PUBLIC SAFETY NOTICE

A Public Safety Notice may be sent to the campus community for general crime prevention purposes, to inform the community of crimes and/or incidents that are not generally time sensitive or considered to be a continuing threat, but important to be aware of, and/or to inform the campus of incidents occurring on, around, and even off-campus that do not meet the requirements or specifications for distribution of a Timely Warning.

SEX OFFENDER COMMUNITY NOTIFICATION

Institutions of higher education are required to issue a statement advising the campus community of where to obtain law enforcement agency information provided by a state concerning registered sex offenders. The law also requires sex offenders already required to register in a State to provide notice, as required under State law, of each institution of higher education in that State at which the person is employed, carries on a vocation, or is a student.

The Colorado Sex Offender Registry, CBI: Sex Offender Registry provides accurate and timely information the law enforcement community and the general public concerning sex offender registration in Colorado.

Additional Resources:
United States Department of Justice National Sex Offender Public Website (nsopw.gov)

SUMMARY OF EMERGENCY RESPONSE AND EVACUATION PROCEDURES

Emergency operations planning at Casa Loma College means preventing, preparing for, responding to, and recovering from any and all emergencies that could affect the College and local communities. Emergency preparedness at Casa Loma College is managed by the Campus Safety and Security Authority Team.
The complete plan is available on the College's website at: Emergency Response Plan (casalomacollege.edu). Students and employees should familiarize themselves with the information in this plan.

Casa Loma College has no residence halls and therefore is not required to conduct annual fire drills or issue missing student notification.

Casa Loma does, however, conduct emergency response drills and exercises each year, such as field exercises and tests of the emergency notification systems on campus. These tests, which may be announced or unannounced, are designed to assess and evaluate the emergency plans and capabilities of the college. Each test is documented and includes a description of the exercise, the date and time of the exercise, and whether it was announced or unannounced.

Drills shall be held at expected and unexpected times, and under varying conditions to simulate the unusual conditions that can occur in an actual emergency. Participants shall relocate to a safe location outside the building and remain at such location until a recall signal is given or further instruction.

The fire/emergency evacuation drills are designed and implemented to meet Clery regulations and intended to keep the faculty, and students informed about threats to their safety and health in a manner that allows them to protect themselves.

In the event of an emergency that requires campus wide evacuation, community members will be directed to the northwest end of the college parking lot.

GENERAL EVACUATION PROCEDURES

At the sound of a fire alarm or if you are instructed to evacuate, leave your classroom, or work area immediately and proceed to the nearest exit, and leave the building. If you are the first to recognize a fire situation, activate the alarm, evacuate to a safe location using the nearest exit, and notify a Campus Security Authority or the Front Desk by calling (303)848-6066 or by dialing 911 for outside emergency responders.

- Remain Calm
- Do NOT use Elevators, Use the Stairs.
- Assist the physically impaired. If he/she is unable to exit without using an elevator, secure a safe location near a stairwell, and immediately inform DPS or the responding Fire Department of the individual's location.
- Proceed to the northwest corner of the college parking lot. Keep all driveways and walkways clear for emergency vehicles.
- Make sure all personnel are out of the building.
- Do not re-enter the building.

WHEN EVACUATION IS NOT POSSIBLE

In a fire or fire alarm situation, always check doors to see if they are hot or warm to the touch before you open them. If heat or smoke prevents you from evacuating, return to your classroom/office and use towels or other cloth items to seal around the door. Hang a white object in the window and re-close the window (if it opens) as much as possible. Do not reopen your window (if it opens) unless forced to do so by smoke. After you have sealed your door, immediately call 911 and advise emergency responders of your location and situation. Wait for help to arrive.

SHELTERING IN PLACE

One of the instructions you may be given in an emergency where a dangerous condition exists outside of a building is shelter-in-place. This is a precaution aimed at keeping you safe while remaining indoors. Shelter-in-place means selecting a small, interior room, with no or few windows, and taking refuge there. Because sheltering in place may be the protective action recommendation for several emergencies with differing risks, and because sometimes the initial recommendation is to shelter in place followed by relocation, there is no single set of shelter in place procedures. Based on the type of emergency, such as Hostile Intruder, or Hazardous Material Release Outside, you should ask yourself: Am I safer inside or outside? Where am I safest inside? Where am I safest outside?

DRUG AND ALCOHOL ABUSE PREVENTION PROGRAM

In an effort to maintain a campus environment that supports and encourages the dissemination of knowledge, the College provides a Drug and Alcohol Abuse Prevention Program in compliance with the Drug-Free Workplace Act of 1988 and Drug-Free Schools and Communities Act Amendment of 1989. All students and employees share the responsibility for protecting our environment and are expected to exemplify high standards of professional and personal conduct. The unlawful manufacture, distribution, dispensation, possession or use of alcohol, illegal drugs, or controlled substances at Casa Loma College would adversely affect the educational environment. Therefore, the College is committed to having a drug-free campus.

As a condition of receiving federal financial assistance, institutions of higher education must certify that they have adopted and implemented a program to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by its students or its employees on its campus or as part of any of its activities. Casa Loma College complies with this requirement and, equally importantly, believes that it has an obligation to create awareness of the health risks associated with alcohol abuse and illicit drug use.

DRUG, CANNABIS AND ALCOHOL POLICIES

The use of any substance, legal or otherwise, for the intention of intoxication, or regardless of intent, if misused, or that is deemed harmful or potentially harmful to self or others, may be considered substance abuse. Casa Loma College therefore prohibits the following on any College owned or controlled property, or at any College activity, on or off campus:

- Illegally manufacturing, distributing, or dispensing illegal drugs, including marijuana and its derivatives
- Storage of illegal drugs, marijuana or alcohol anywhere on College property
- Possessing, selling or using drug paraphernalia
- Possessing or consuming alcohol or illegal drugs, marijuana, and/or being impaired by alcohol, illegal drugs, or marijuana.

CANNABIS POLICY

Marijuana is an illegal substance and is prohibited. Marijuana is considered a Schedule I drug by the US Drug Enforcement Agency, which means it has a high potential for abuse, and no currently accepted medical treatment use. Cannabis may cause permanent damage to lungs, reproductive organs and brain function, slows reflexes, increases forgetfulness, and alters judgment of space and distance. Any student who is found to be in possession of or using marijuana will face disciplinary action, up to termination and possible criminal charges. Water pipes, bongs, hookahs, and other paraphernalia commonly associated with drug use are also prohibited.

Medical cannabis which is prescribed for healing purposes is prohibited on Casa Loma College property, during College events or activities, or during off-campus College related work, even though there may be state laws which permit its use.

The College considers the abuse of cannabis to be incompatible with the essential functions of health care providers.

TOBACCO AND E-CIGARETTE POLICY

It is the policy of Casa Loma College to provide a safe learning and working environment for both students and employees. It is recognized that smoke from cigarettes, pipes and other cigars is hazardous to health. According to the US Food and Drug Administration that cigarettes pose acute health risks and detectable levels of carcinogens and toxic chemicals.

Smoking and the use of tobacco and e-cigarette products are not permitted on any Casa Loma College property, including all buildings and facilities, walkways, and building entrances, except as provided below. This policy applies to all students, faculty, staff, and other persons on campus, regardless of the purpose of their visit. Students and faculty must also abide by all clinical facility rules and regulations pertaining to smoking.

Designated smoking areas have been established in the student parking lots. When using designated smoking areas students should not leave cigarette butts on the ground. Cigarettes must be disposed of in trash receptacles.

“E-cigarette” means any electronic oral device, such as one composed of a heating element, battery, and/or electronic circuit, which provides a vapor of nicotine or any other substances, and the use or inhalation of which simulates smoking. The term shall include any such device, whether manufactured, distributed, marketed, or sold as an e-cigarette, e-cigar, e-pipe, or under any other product name or descriptor.

“Smoking” means inhaling, exhaling, burning, or carrying any lighted or heated cigar, cigarette, or pipe, including a hookah pipe, or any other lighted or heated tobacco or plant product, including marijuana, intended for inhalation, in any manner or any form. “Smoking” also includes the use of an e-cigarette which creates a vapor, in any manner or in any form, or the use of any oral smoking device for the purpose of circumventing the prohibition of smoking in this policy.

“Tobacco Product” means any substance containing tobacco leaf, including but not limited to cigarettes, cigars, pipe tobacco, hookah tobacco, snuff, chewing tobacco, dipping tobacco, blunts, clove cigarettes, or any other preparation of tobacco; and any product or formulation of matter containing biologically active amount of nicotine that is manufactured, offered for sale, sold, or otherwise distributed with the expectation that the product or matter will be introduced into the human body by inhalation, but does not include any cessation product specifically approved by the U.S. Food and Drug Administration for use in treating nicotine or tobacco dependence.

All smoking materials be extinguished prior to entering upon any Casa Loma College property without exception.

It is the responsibility of the student to observe the policy on Tobacco and E-cigarettes. Failure to comply with the policy will be treated as a violation of the College's policies and may result in disciplinary action.

SANCTIONS

Student sanctions for violation of the College's Drug, Cannabis and Alcohol policy include disciplinary action (as described below) and referral for criminal prosecution depending upon the nature and gravity of the infraction and the degree to which violation of the policy adversely affected the well-being of the community or the fulfillment of the College's mission. Sanctions will be administered by the Chief Executive Officer. Penalties for infractions, even for a first offense, range from a warning, referral for an appropriate assistance program, confiscation, restitution, suspension, up to and including termination from the program and the College. Failure or refusal to complete any necessary paperwork or to submit to a drug screening is grounds for disciplinary action up to and including termination. Students who are not satisfied with the outcome of discipline for an infraction of this policy may take advantage of the provisions of the Student Grievance Policy found under *Student Policies and Procedures* in the College Catalog.

Depending upon the circumstances, continued attendance at the College by students who are found to be in violation of the terms of this policy may be contingent upon satisfactory completion of drug screening and interim drug screening as required, participation in a drug abuse assistance, counseling and/or rehabilitation program.

NOTE: A conviction for the sale or possession of illegal drugs may affect a student's eligibility for federal student financial aid. For more information students can refer to the Federal Student Aid Webpage at: http://www.ifap.ed.gov.

FEDERAL OFFENSES

Title 21 U.S.C. Sections 841 and 844 to 845 state that it is unlawful to possess a controlled dangerous substance, including marijuana, cocaine, LSD, PCP, heroin, designer drugs, etc. If the substance is cocaine, or contains a cocaine base, the penalty for simple possession is a fine and/or imprisonment from 5 to 20 years. For other illegal drugs, the penalty for simple possession is a fine of at least $1000.00 and/or imprisonment up to 3 years. The penalties increase if the possession includes intent to manufacture, distribute, or dispense a controlled substance, especially if done near a public or private elementary, vocational, or secondary school or a public or private college or university. Additionally, any person who violates this law shall be liable for an amount up to $10,000.00 in civil penalties.

In addition to Federal laws, the State of Colorado has its own laws dealing with distribution, manufacturing, and possession of controlled substances.

The U.S. Code establishes and authorizes the U.S. Attorney General to revise as needed, classifications of controlled substances. The drugs are each classified in one or more of five "schedules." Schedule I, being comprised essentially of "street drugs" and Schedule V being comprised of drugs with a "low potential for abuse" when compared with drugs in Schedules I-IV. Examples of Schedule I drugs are heroin and marijuana. PCP, for example, is a Schedule II drug. Amphetamine is a Schedule III drug, while Barbital is a Schedule IV drug. An example of a Schedule V drug would be a prescription medication with not more than 200 mg of codeine per 100 grams.

The penalties for a first offense conviction of violating the laws described in items (a) and (b) above are:

- In the case of a Schedule I or II drug which is a narcotic drug, not more than fifteen (15) years in prison, a fine of not more than $25,000, or both.
- In the case of a Schedule I or II drug which is not a narcotic drug or in the case of a Schedule III drug, not more than five (5) years in prison, a fine of not more than $15,000, or both.
- In the case of a schedule IV drug, not more than three (3) years in prison, a fine of not more than $10,000, or both.
- In the case of a Schedule V drug, not more than one (1) year in prison, a fine of not more than $5,000 or both.
- Notwithstanding sub-paragraphs (1) through (4) above, the distribution of a small amount of marijuana for no remuneration is punishable by imprisonment of not more than one (1) year and/or a fine of not more than $5,000.
- Notwithstanding subparagraph (1) through (4) above, the manufacture, possession, or distribution, or intent to manufacture, possess, or distribute phencyclidine (PCP, "angel dust") is punishable by up to ten (10) years in prison and/or a fine of not more than $25,000.

Penalties for subsequent violations of these provisions are progressively more severe than for initial convictions.

DRUG CLASSIFICATION SCHEDULES

1. Schedule I
    a. The drug or other substance has a high potential for abuse.
    b. The drug or other substance has no currently accepted medical use in treatment in the United States.
    c. There is a lack of accepted safety for use of the drug or other substance under medical supervision.

   d. Consist primarily of “street drugs” such as heroin, morphine, marijuana, LSD, mescaline, etc.
2. Schedule II
   a. The drug or other substance has a high potential for abuse.
   b. The drug or other substance has a currently accepted medical use in treatment in the United States or a currently accepted medical use with severe restrictions.
   c. Abuse of the drug or other substances may lead to severe psychological or physical dependence.
   d. Includes opium, cocaine and methadone, among other illicit drugs.
3. Schedule III
   a. The drug or other substance has a potential for abuse less than the drugs or other substances in schedules I and II.
   b. The drug or other substance has a currently accepted medical use in treatment in the United States.
   c. Abuse of the drug or other substance may lead to moderate or low physical dependence or high psychological dependence.
   Include those which have less potential for abuse than schedule I or II
4. Schedule IV
   a. The drug or other substance has a low potential for abuse relative to the drugs or other substances in schedule III.
   b. The drug or other substance has a currently accepted medical use in treatment in the United States.
   c. Abuse of the drug or other substance may lead to limited physical dependence or psychological dependence relative to the drugs or other substances in schedule III.
5. Schedule V
   a. The drug or other substance has a low potential for abuse relative to the drugs or other substances in schedule IV.
   b. The drug or other substance has a currently accepted medical use in treatment in the United States.
   c. Abuse of the drug or other substance may lead to limited physical dependence or psychological dependence relative to the drugs or other substances in schedule IV

HEALTH RISKS OF ALCOHOL AND OTHER DRUGS

There are definite health risks associated with the use of alcohol and illegal substances. Students who experiment with drugs, alcohol and illegal substances, or use them recreationally, may develop a pattern of use that leads to abuse and addiction. Use of alcohol and illegal substances is a major factor in accidents and injuries, and among persons between the ages of 18 and 24, it is responsible for more deaths than all other causes combined. Mothers who drink alcohol during pregnancy may give birth to infants with fetal alcohol syndrome which can cause irreversible physical abnormalities and mental retardation. Long term consumption of large quantities of alcohol can lead to permanent damage to vital organs such as brain and liver.

- *Alcohol* can cause toxic psychosis, physical dependence, neurological and liver damage, fetal alcohol syndrome, impaired judgment
- *Amphetamines* can cause loss of appetite, delusions, hallucinations, heart problems, hypertension, irritability, insomnia, toxic psychosis, rebound depression
- *Barbiturates* can cause severe withdrawal, possible convulsions, toxic psychosis, depression, physical dependencies, impaired judgment
- *Benzodiazepines* can cause impaired judgment, sedation, panic reaction, seizures, psychological dependence, physical dependence
- *Cannabis* Causes permanent damage to lungs, reproductive organs and brain function; slows reflexes; increases forgetfulness; alters judgment of space and distance.
- *Cocaine* Causes damage to respiratory and immune systems; induces malnutrition, seizures and loss of brain function. Some forms (such as “crack”) are highly addictive.
- *Codeine* can cause physical dependence, weight loss, seizure, heart attack, stroke, hypertension, psychosis, chromic cough, nasal passage injury, hallucinations
- *Hallucinogens* (PCP, LSD, Ecstasy) Causes extreme distortions of what’s seen and heard; induces sudden changes in behavior, loss of concentration and memory; increases risk of birth defects in user’s children; overdose can cause psychosis, convulsions, coma, and death. Frequent use can cause permanent loss of mental function.
- *Heroin* can cause physical dependence, constipation, loss of appetite, lethargy, respiratory depression
- *Inhalants* can cause psychological dependence, psychotic reaction, confusion, frozen airway, sudden death
- *Mescaline* may intensify existing psychosis, hallucinations at high dose
- *Morphine* can cause physical dependence, constipation, loss of appetite, lethargy
- *Sedatives* Tolerance increases rapidly; produces physical and psychological dependence; causes reduced reaction time, and confusion; overdoses can cause coma, respiratory arrest, convulsions, and death; withdrawal can be dangerous; in combination with other controlled substances can quickly cause coma and death.
- *Steroids* can cause cholesterol imbalance, acne, baldness, anger management problems, masculinization of women, breast enlargement in men, premature fusion of long bones preventing attainment of normal height, atrophy of reproductive organs, impotence, reduced fertility, stroke, hypertension, congestive heart failure, liver damage, depression

For more information on the effects of specific substances visit:
https://www.dea.gov/druginfo/factsheets.shtml

DRUG AND ALCOHOL ASSISTANCE AND RESOURCES

PREVENTION

To prevent drug and alcohol abuse, it is important to stay informed. Click on the links below to learn more about preventing substance abuse and warning signs that you or someone you know may have a problem. If you think you may have a problem, take one of the screenings below and talk to a professional about your concerns. Local and national resources are listed below.

- https://www.samhsa.gov/prevention
- https://www.drugabuse.gov/drugs-abuse/commonly-abused-drugs-charts
- https://www.recoveryconnection.com/prevent-drug-addiction/
- https://www.helpguide.org/articles/addictions/drug-abuse-and-addiction.htm

Screening Resources:

- http://www.drugscreening.org/
- http://www.alcoholscreening.org/Home.aspx

SUBSTANCE ABUSE EDUCATION

The College does not provide in-house alcohol and drug prevention programs, however, it does refer employees and students in need to local counseling and treatment facilities within the campus's jurisdiction. Students are encouraged to contact the local Alcoholics Anonymous Organization http://www.aa.org/.

AVAILABLE COUNSELING, TREATMENT, REHABILITATION OR REENTRY PROGRAM

Help is available for persons in need of counseling or other treatment for substance abuse. Listed below are several agencies within the jurisdiction of each of our campuses.

COMMUNITY SUPPORT PROGRAMS

The following 12-Step Programs provide support for addiction recovery:

- AL-ANON (818) 760-7122 http://www.al-anon.alateen.org
- Alcoholics Anonymous (818) 988-3001 www.aa.org
- Cocaine Anonymous (818) 760-8402 www.ca.org
- Cannabis Anonymous (800) 766-6779 www.cannabis-anonymous.org
- Narcotics Anonymous (818) 773-9999 www.na.org

COMMUNITY TREATMENT PROGRAMS

- Matrix Institute on Addictions (fee for service) (800) 310-7700 http://www.matrixinstitute.org

- Denver Metro Fair Housing Authority – a non-profit committed to ending housing discrimination. 720-279-4291.

National Toll-Free Hotlines The National Institute on Drug Abuse Hotline Information and Referral line (800) 662-HELP (M-F, 8:30a.m. - 4:30p.m.)	**Parent's Resource Institute for Drug Education (PRIDE)** 1-800-241-9746 (M-F, 8:30a.m. - 5:00p.m.) 1-800-COCAINE (M-F, 9:00a.m. – 3:00a.m.; S-S, 12 noon – 3:00a.m.)

SEXUAL MISCONDUCT AND HARASSMENT PREVENTION POLICY

Casa Loma College is committed to fostering an environment that is safe, secure, and free from sexual discrimination and harassment, sexual violence, dating and domestic violence, and stalking. The College recognizes its responsibility to increase awareness of such misconduct, prevent its occurrence, and reduce its effects by supporting victims, dealing fairly with offenders, and diligently investigating formal complaints of covered sexual harassment. In addressing these issues, all members of the College must come together to respect and care for one another in a manner consistent with our deeply held academic and community values.

Pursuant to Title IX, this Policy provides that the College will respond promptly, and in a manner that is not deliberately indifferent, when the College has Actual Knowledge of Covered Sexual Harassment prohibited by this Policy, including sexual assault, dating violence, domestic violence, and stalking, that occurs in a College education program or activity, and is committed by a current Casa Loma student, employee, or third party.

As defined below, this policy prohibits covered sexual harassment. This policy also prohibits retaliation against any individual who, in good faith, asserts their right to bring a complaint under this policy (including individuals who make third-person reports), participates or refuses to participate in an investigation or hearing under this policy, or protests alleged conduct prohibited by this policy (including retaliation).

The College is committed to responding to all forms of sexual harassment. Reports of misconduct outside the scope of this Policy, including sexual harassment that does not meet the definition of Covered Sexual Harassment prohibited by Title IX and this Policy, may be addressed under other College Policies.

Non-Discrimination In Application

The requirements and protections of this Policy apply equally regardless of sex, sexual orientation, gender, gender identity, gender expression, age, race, nationality, class status, ability, religion, or other protected classes covered by federal or State law. All requirements and

protections are equitably provided to individuals regardless of such status or status as a Complainant, Respondent, or Witness. Individuals who wish to file a complaint about Casa Loma Colleges' Policy or process may contact the Department of Education's Office for Civil Rights using contact information available at https://www2.ed.gov/about/offices/list/ocr/index.html

DEFINITION OF PROHIBITED CONDUCT

Covered Sexual Harassment: Covered Sexual Harassment includes any conduct on the basis of sex that satisfies one or more of the following conditions:

- **Quid Pro Quo** where an employee conditioning educational benefits on participation in unwelcome sexual conduct;
- **Unwelcome Sexual Conduct** that a reasonable person would determine is so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the College's education program or activity;
- **Sexual Assault** (as defined in the Clery Act), which includes any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent;
- **Dating Violence** (as defined in the Violence Against Women Act ("VAWA") amendments to the Clery Act): Includes any violence committed by a person: (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: (i) the length of the relationship; (ii) the type of relationship; (iii) the frequency of interaction between the persons involved in the relationship.
- **Domestic Violence** (as defined in the VAWA amendments to the Clery Act), which includes any felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under Colorado's domestic or family violence laws, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws ofColorado.
- **Stalking** (as defined in the VAWA amendments to the Clery Act), meaning engaging in a course of conduct directed at a specific person that would cause a reasonable person to: (A) fear for their safety or the safety of others; or (B) suffer substantial emotional distress.

IMPORTANT POLICY-RELATED CONCEPTS

Affirmative Consent is a knowing, voluntary, and mutual decision among all participants to engage in sexual activity.

- Consent can be given by words or actions, as long as those words or actions clearly communicate willingness to engage in the sexual activity. It is important not to make assumptions about consent. If there is confusion or ambiguity, participants need to stop sexual activity and communicate about each person's willingness to continue.

- Consent cannot be procured by the use of physical force, compulsion, threats, intimidating behavior, or coercion.
- Consent cannot be obtained from, or given by, a person who is incapacitated.
- Consent to one form of sexual activity does not imply consent to other forms of sexual activity.
- Consent to engage in sexual conduct with one person does not imply consent to engage in sexual conduct with another person.
- Silence or the lack of resistance, in and of itself, does not demonstrate consent. Again, it is important not to make assumptions; if confusion or ambiguity arises during a sexual interaction, it is essential that each participant stops and clarifies the other's willingness to continue engaging in the sexual conduct.
- Consent can be withdrawn at any time, including after it is initially given. When consent is withdrawn or can no longer be given, sexual activity must stop.
- Previous relationships or previous consent for sexual activity is not consent to sexual activity at another time. However, established patterns of consent in a specific relationship may be considered when evaluating whether affirmative consent was given on a particular occasion.
- Accepting a meal, a gift, or an invitation to socialize, including on dating apps, does not imply or constitute consent to sexual activity.
- The definition of consent does not vary based on a participant's sex, sexual orientation, gender identity, gender expression or relationship status.

Education Program or Activity includes:

- Any on-campus premises.
- Any off-campus premises that Casa Loma College has substantial control over.
- Activity occurring within computer and internet networks, digital platforms, and computer hardware or software owned or operated by, or used in the operations of Casa Loma College's programs and activities over which the College has substantial control.

Formal Complaint: Formal Complaint means a document – including an electronic submission - filed by a complainant with a signature or other indication that the complainant is the person filing the formal complaint, or signed by the Title IX Coordinator, alleging sexual harassment against a respondent about conduct within Casa Loma College's education program or activity and requesting initiation of the procedures consistent with the Title IX Policy to investigate the allegation of sexual harassment. Complainants are only able to file a Formal Complaint under this policy if they are currently participating in, or attempting to participate in, the education programs or activities of the College, including as an employee.

Complainant: Complainant means any individual who has reported being or is alleged to be the victim of conduct that could constitute covered sexual harassment as defined under this policy.

Relevance: The basic test for relevance is whether the evidence presented and/or hearing question posed tends to make an allegation of sexual harassment more or less likely to be true. The following type of evidence and questions are not relevant:

- Evidence and questions about the Complainant's sexual predisposition or prior sexual behavior unless:
    - they are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or
    - they concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.
- Evidence and questions that constitute or seek disclosure of information protected under a legally recognized privilege.
- Any party's medical, psychological, and similar records unless the party has given voluntary, written consent.

Respondent: Any individual who has been reported to be the perpetrator of conduct that could constitute covered sexual harassment as defined under this policy.

Privacy vs. Confidentiality: References made to ***confidentiality*** refer to the ability of identified confidential resources to not report crimes and violations to law enforcement or college officials without permission, except for extreme circumstances, such as a health and/or safety emergency or child abuse. References made to ***privacy*** mean Casa Loma College offices and employees who cannot guarantee confidentiality but will maintain privacy to the greatest extent possible, and information disclosed will be relayed only as necessary to investigate and/or seek a resolution and to notify the Title IX Coordinator or designee, who is responsible for tracking patterns and spotting systemic issues. Casa Loma College will limit the disclosure as much as practicable, even if the Title IX Coordinator determines that the request for confidentiality cannot be honored.

Retaliation: The College or other person may not intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX because the individual made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing.

Intimidation, threats, coercion, or discrimination, including charges against an individual for Student Code of Conduct violations that do not involve sex discrimination or sexual harassment, but arise out of the same facts or circumstances as a report or complaint of sex discrimination, or a report or formal complaint of sexual harassment, for the purpose of interfering with any right or privilege secured by Title IX constitutes retaliation.

DISABILITY ACCOMMODATIONS

This policy does not alter any institutional obligations under federal disability laws including the Americans with Disabilities Act of 1990, and Section 504 of the Rehabilitation Act of 1973. Parties may request reasonable accommodations for disclosed disabilities to the Title IX Coordinator at any point before or during the Title IX Process that do not fundamentally alter the Process. The Title IX Coordinator will not affirmatively provide disability accommodations that

have not been specifically requested by the Parties, even where the Parties may be receiving accommodations in other institutional programs and activities.

Making A Report Regarding Covered Sexual Harassment

Casa Loma College provides a range of options for those who believe they have experienced sexual harassment and individuals are encouraged to bring their concerns to the College's attention immediately. The College takes allegations of sexual harassment very seriously and will actively respond to alleged sexual harassment and will take remedial action, where appropriate.

The College does not limit the time for submitting a complaint of sexual harassment but strongly urges the immediate reporting of complaints or concerns. Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of sexual harassment. The College's ability to investigate and respond effectively may be reduced with the passage of time.

Sexual harassment should be reported immediately to Casa Loma College's Title IX Coordinator:

Veronica Pantoja
Director of Human Resources, Title IX Coordinator & Student Disability Coordinator
15301 Ventura Blvd, D-100, Sherman Oaks, CA 91405
veronica.pantoja@casalomacollege.edu
(818) 785-2726 ext. 223

Such a report may be made at any time (including during non-business hours) by using the telephone number or electronic mail address, or by mail to the office address listed for the Title IX Coordinator. Reports made to the Title IX Coordinator should include all the information known to the Complainant or including, but not limited to, the following:

- the identity and status of the Complainant and the Respondent (e.g., employee, student);
- details concerning the incident(s) or conduct that gave rise to the report;
- date(s) of, and location(s) of the incident(s);
- the identity and status of any witness(es) to the incident(s) with telephone numbers, email addresses, and street addresses if known.

Reports may be submitted anonymously, by witnesses, or by others who are made aware of the incident. However, anonymous reports may limit the College's ability to investigate and respond. Reports of sexual harassment do not automatically initiate a formal investigation. The Title IX Coordinator will attempt to gather additional information from relevant individuals and assess such information to determine next steps.

ON-CAMPUS RESOURCES AND SUPPORT

The following Officials **will provide privacy**, but not confidentiality, upon receiving a report of conduct prohibited under this policy:

- Title IX Coordinator, Veronica Pantoja. (818) 785-2726 ext. 223 or veronica.pantoja@casalomacollege.edu
- President, Dr. Scott Sand, (818) 785-2726 ext. 214 or scott.sand@casalomacollege.edu
- Student Ombudsman, Nicholas Walsh-Davis. (818) 785-2726 ext. 208 or nicholas.walsh-davis@casalomacollege.edu

The following have been designated as **confidential resources**:

- Student Advocate: Zackary Gilanyi. Room 111, (818) 785-2726 ext. 204 or zackary.gilanyi@casalomacollege.edu

OFF-CAMPUS RESOURCES AND SUPPORT

- **Violence Free Colorado** Domestic Violence Hotline 1-800-799-7233

  You have the Right
  You Have the Right CO – Sexual Assault Reporting Assistance in Colorado Identifies support services for individuals seeking information regarding sexual assault.
  https://youhavetherightco.org

- ***National Sexual Assault Online Hotline*** - Offers free, confidential, and secure help 24/7, if you need someone to talk to or help with pressing charges or understanding your healing process.
  Hotline: 800-656-HOPE (4673)

- RAINN (Rain, Abuse, & Incest National Network) - Can help you find a local rape crisis center anywhere in the U.S. when you click here. These crisis centers also have 24/7 hotlines that serve victims of sexual violence. They are trained to provide you with the support and information you need.

- The National Center for Victims of Crime – Provides a fast and easy way to locate crime victim assistance throughout the country by clicking here.

- The National Domestic Violence Hotline - A 24/7 center that has access to service providers and shelters across the U.S.
  Hotline: 800-799-7233

- Discrimination | Colorado Civil Rights Division - Colorado Department of Regulatory Agencies – Colorado Civil Rights Division – The state agency that enforces the state workplace anti-discrimination laws. ((303) 894-2997

Request for Anonymity by a Complainant

Casa Loma College is committed to protecting the privacy of all individuals involved in a report of sexual misconduct. The College, through the Title IX Coordinator, will take all reasonable steps to investigate and respond to the complaint consistent with the request not to share identifying information or pursue an investigation, but its ability to do so may be limited by the request.

The College will take all reasonable steps to investigate and respond to the report consistent with the request not to share identifying information or pursue an investigation. Where the College is unable to act consistently with the request for confidentiality/anonymity, the Title IX Coordinator will inform the complainant about the chosen course of action.

SUPPORTIVE AND INTERIM MEASURES

The College will work with individuals affected by sexual harassment to ensure their safety and promote their well-being. In addition to providing preliminary information regarding the Title IX process, Title IX Coordinator will discuss the availability of supportive measures with both parties. Supportive measures are designed to ensure that both parties maintain equal access to College employment and educational programs and activities, without unreasonably burdening the other party. The measures are designed to protect the safety of all parties and the College environment, including the deterrence of violations of this policy. For example, supportive measures may include extensions of deadlines or other course-related adjustments, modifications of work or class schedules, no contact directives, campus escort services, mutual restrictions on contact between the parties, leaves of absence or administrative leave, increased security, and monitoring of certain areas of the campus, and other similar measures.

In determining whether supportive measures are appropriate, Title IX Coordinator will consider the Complainant's wishes, as well as the burden to the parties. Where supportive measures are deemed appropriate, they will be non-disciplinary, non-punitive, and provided without fee or charge to the parties. Supportive measures may be provided to either party at any phase in the process, regardless of whether a formal complaint has been filed. Supportive measures will be kept confidential to the extent possible.

The College may also impose interim measures, based on the totality of facts known at the time, to ensure the safety of all parties involved, to prevent the escalation of conflict, and to protect the integrity of the disciplinary process while the process is ongoing. If, after taking an individualized safety and risk analysis, the College determines there is an immediate threat to the physical health or safety of any individual arising from the sexual harassment allegations, the College may consider removing a Respondent from educational programs or activities on an emergency basis. Where removal is deemed appropriate, the Respondent will receive prompt notice and have an opportunity to challenge the decision by appealing to the Title IX

Coordinator. The appeal must be in writing and may be no longer than five double-spaced, 8 typewritten pages. The appeal must be delivered to Title IX Coordinator within three (3) business days of notice of the removal decision (via email, mail, or hand delivery). Failure to meet the deadline for appeal will result in waiver of the right to appeal.

The imposition of supportive and interim measures does not indicate that the College has made a final decision about the report of prohibited conduct. The College will provide notice about these supportive and interim measures only to those who need to know to make them effective.

Failure to comply with supportive and/or interim measures or other directives is a violation of College Policy and may lead to additional disciplinary action.

THE TITLE IX GRIEVANCE PROCESS

Informal Resolution

Parties who do not wish to proceed with an investigation and live hearing and instead seek the College's assistance to resolve allegations of Title IX-covered misconduct, may elect to enter the informal resolution process. In addition, a complainant who files a Formal Complaint may elect, at any time, to address the matter through the Institution's Informal Resolution Process. All Parties to a Formal Complaint must agree to enter the Informal Resolution Process through an informed written consent. This informed written consent will include a statement that any agreement reached through the process is binding on the Parties.

Even where the Parties agree to submit a matter to informal resolution, the Title IX Coordinator must approve the decision to move the matter to the informal resolution process and may determine that informal resolution is not appropriate under the circumstances.

Factors that the Title IX Coordinator may weigh in considering the appropriateness of the informal resolution process include, but are not limited to, the gravity of the allegations, whether there is an ongoing threat of harm or safety to the campus, whether the respondent is a repeat offender, and whether the Parties are participating in good faith. This determination is not subject to appeal.

Please note, the informal resolution processes may never be applied where the allegations include {Sexual Assault: Penetration or the equivalent}.

Informal resolution is only permitted to address allegations of student-on-student sexual harassment and is never allowed as an option to resolve allegations that an employee sexually harassed a student.

At any time after the commencement of the informal resolution process, the Title IX Coordinator may determine that the informal resolution process is not an appropriate method for resolving the matter and may require that the matter be resolved through the formal process. This determination is not subject to appeal.

Informal resolution processes are managed by facilitators, who may not have a conflict of interest or bias in favor of or against complainants or respondents generally or regarding the specific Parties in the matter. The Title IX Coordinator may serve as the facilitator, subject to these restrictions.

All facilitators must have training in the definition of sexual harassment under 34 C.F.R. § 106.30(a), the scope of the institution's education program or activity, how to conduct informal resolution processes, and how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, or bias.

Confidentiality
In entering the informal resolution process, the Parties agree that any testimony and evidence (including admissions of responsibility) they share or receive during the informal resolution process concerning the allegations of the Formal Complaint is confidential while the parties are participating in the informal resolution process. No evidence concerning the allegations obtained within the informal resolution process may be disseminated to any person, provided that any Party to the informal resolution process may generally discuss the allegations under investigation with a parent, friend, advisor, or other source of emotional support, or with an advocacy organization. Should the Parties withdraw from the informal resolution process, information disclosed or obtained for purposes of the informal resolution process may be incorporated into the formal investigation and live hearing, provided that this information is disclosed and reviewed by the Parties under the investigatory and hearing procedures described in the Title IX Grievance Process.

Administrative Resolution
Should the Parties mutually determine to enter the informal resolution process, and the respondent elects to accept responsibility for the allegations of the Formal Complaint at any point during the informal resolution process, the institution may administratively resolve the Formal Complaint.

Where the respondent admits responsibility, the Parties will receive simultaneous written notification of the acceptance of responsibility, and {a Hearing Officer(s)} will convene to determine the respondent's sanction and other remedies, as appropriate and consistent with institutional policy. The Parties will be given an opportunity to be heard at the sanctions hearing, including but not limited to the submission of impact statements, and the Parties may be accompanied by their Advisor, but questioning of Parties or witnesses will not be permitted. The Parties will receive simultaneous written notification of the decision regarding sanctions and remedies, which may be appealed according to the process described in the Title IX Grievance Policy.

Formal Complaint
To initiate a formal complaint, the Complainant must submit a written document, physical or digital, alleging sexual harassment against a Respondent and requesting the College to investigate the allegations. The formal complaint must contain the Complainant's physical or

digital signature or otherwise indicate that the Complainant is the person filing the formal complaint, and the document should be submitted to the Title IX Coordinator.

The complaint must include the following information:

- the identity and status of the Complainant and Respondent(s);
- details concerning the incident(s) or conduct that gave rise to the complaint;
- date(s) of the incident;
- location(s) of the incident(s);
- the identity and status of any witness(es) to the incident(s) with telephone numbers, email addresses, and street addresses if known.

In certain instances, if a complainant does not wish to make a Formal Complaint, the TC Title IX Coordinator may determine whether a Formal Complaint is necessary and will file such a formal complaint and inform the Complainant. In such instances, the Title IX Coordinator is not a party to the matter, and, if known, the identities of the parties will be made known in any subsequent notice of allegations to the Respondent.

Nothing in the Title IX Grievance Policy prevents a complainant from seeking the assistance of state or local law enforcement alongside the appropriate on-campus process.

Notice of Allegations

Upon receipt of a formal complaint, the College must provide written notice to the parties who are known, which includes sufficient details known at the time and with sufficient time to prepare a response before any initial interview. Sufficient details include the identities of the parties involved in the incident, if known (including the Complainant), the conduct allegedly constituting sexual harassment, and the date and location of the alleged incident, if known. A party may not proceed anonymously in connection with a formal investigation.

The notice must include reasonably prompt time frames for the investigation and a process that allows for any temporary delay of the investigation or the limited extension of time frames for good cause with written notice to the Complainant and the Respondent of the delay or extension and the reasons for the action. The notice must include a statement that the Respondent is presumed not responsible for the alleged conduct and that a determination regarding a violation of the policy is made at the conclusion of the grievance process. The notice must inform the parties that they may have an advisor of their choice, who may be, but is not required to be an attorney. The notice must include a statement that before the conclusion of the investigation, the parties may inspect and review evidence that is directly related to the allegations, including evidence upon which the College does not intend to rely in reaching a determination regarding responsibility, and evidence that both tends to prove or disprove the allegations whether obtained from a party or other source. The notice must inform the parties of any provision in the College's Student Code of Conduct that prohibits knowingly making false statements or knowingly submitting false information during the investigation. If, during the investigation, the Title IX Coordinator decides to investigate allegations about the Complainant or Respondent that are not included in the notice initially provided, the Title IX Coordinator must provide notice of the additional allegations to the parties whose identities are known.

The Title IX Coordinator must also provide written notice to any parties whose participation is invited or expected (i.e., witnesses) of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other meetings with sufficient time for the party to prepare to participate.

Ongoing Notice

If, in the course of an investigation, the institution decides to investigate allegations about the complainant or respondent that are not included in the Notice of Allegations and are otherwise covered "sexual harassment" falling within the Title IX Grievance Policy, the institution will notify the parties whose identities are known of the additional allegations by their institutional email accounts or other reasonable means. The parties will be provided with sufficient time to review the additional allegations to prepare a response before any initial interview regarding those additional charges.

Initial Assessment of Formal Complaint

The Title IX Coordinator **must dismiss** a formal complaint under the following circumstances:

- the alleged matter does not meet the Title IX definition of sexual harassment as described above;
- the alleged matter does not arise from a College education program or activity;
- the alleged matter is not raised against a person in the United States;
- the alleged matter occurred before August 14, 2020.

The Title IX Coordinator **may dismiss** a formal complaint under the following circumstances:

- the Complainant submits a written request to withdraw the complaint;
- the Respondent is no longer at the College

If a complaint is dismissed, it may qualify for review under a separate, applicable College policy. Parties will simultaneously be provided with a written notice containing the reason(s) for dismissal and that dismissals may be appealed.

Appealing Dismissal of Formal Complaint

Appeals pertaining to the dismissal of a formal complaint must be submitted to the Title IX Coordinator within three (3) business days from receipt of the dismissal. The appeal must meet one or more of the following criteria:

- **Procedural Irregularity:** An appeal based on procedural irregularity must identify with specificity each alleged irregularity within the consideration of the complaint and the ways in which the specified irregularity(s) affected the decision to dismiss the complaint; or
- **New Evidence:** An appeal based on new evidence must explain why this information was not reasonably available at the time when the decision to dismiss the formal complaint was made and how this information could affect the decision to dismiss the complaint. Information not provided because a party declined to participate or withdrew

from the process cannot be considered new information for the purpose of appeal. This includes situations where a party declines to participate on the advice of their advisor; and/or

- **Conflict of Interest/Bias**: An appeal based on conflict of interest or bias must explain how the Title IX Coordinator had a conflict of interest or bias for or against complainants or respondents generally, or the individual Complainant or Respondent that affected the decision to dismiss the complaint.

Upon receipt of an appeal from one of the parties, the Title IX Coordinator will inform the other party and provide a copy of the appeal. The non-appealing party will have three (3) business days from receipt of the appeal to respond should the party wish to do so. If both the Complainant and the Respondent appeal, the appeals will be considered concurrently, and each party will have the opportunity to review and respond to the other party's appeal.
The Title IX Coordinator will review the appeal and non-appealing party's response (if provided). Within three (3) business days (of the non-appealing party's response or the appeal if no response is provided), the Title IX Coordinator will communicate, in writing, the determination regarding the appeal simultaneously to both parties. The Title IX Coordinator may take the following actions:

- Uphold the decision to dismiss the complaint. In such cases, the complaint may be considered for investigation under a separate, applicable policy; or
- Reverse the decision to dismiss the complaint. If the Title IX Coordinator reverses the decision to dismiss, the complaint will be investigated as outlined in the Formal Investigation Process section in this policy.

The determination of the Title IX Coordinator is final. Failure to meet the deadline for appeal will result in waiver of the right to appeal.

Determining Jurisdiction
The Title IX Coordinator will determine if the Title IX Grievance Process should apply to a Formal Complaint. The Process will apply when all of the following elements are met, in the reasonable determination of the Title IX Coordinator:

- The conduct is alleged to have occurred on or after August 14, 2020;
- The conduct is alleged to have occurred in the United States;
- The conduct is alleged to have occurred in Casa Loma College's education program or activity; and
- The alleged conduct, if true, would constitute covered sexual harassment as defined in this policy.

If all of the elements are met, Casa Loma College will investigate the allegations according to the Title IX Grievance Process.

If any one of these elements are not met, the Title IX Coordinator will notify the parties that the Formal Complaint is being dismissed for the purposes of the Title IX Grievance Policy. Each party may appeal this dismissal using the procedure outlined in "Appeals," below.

The Title IX Coordinator may dismiss a Formal Complaint brought under the Title IX Grievance Policy, or any specific allegations raised within that Formal Complaint, at any time during the investigation or hearing, if:

- A complainant notifies the Title IX Coordinator in writing that they would like to withdraw the Formal Complaint or any allegations raised in the Formal Complaint;
- The respondent is no longer enrolled or employed by Casa Loma College; or,
- If specific circumstances prevent Casa Loma College from gathering evidence sufficient to reach a determination regarding the Formal Complaint or allegations within the Formal Complaint.

Upon reaching a decision that the Formal Complaint will be dismissed, the institution will promptly send written notice of the dismissal of the Formal Complaint or any specific allegation within the Formal Complaint, and the reason for the dismissal simultaneously to the parties through their email accounts. It is the responsibility of parties to maintain and regularly check their email accounts. Any party may appeal a dismissal determination using the process set forth in “Appeals,” below.

Advisor of Choice and Participation of Advisor of Choice

Complainants and Respondents may be accompanied by an advisor of their choice (which may be an attorney but does not need to be so) to any meeting or proceeding related to any incident of sexual harassment. Advisors may provide support and advice about the investigation, hearing, and disciplinary processes.

Complainants and Respondents may choose not to have an advisor during the investigative process. However, Complainants and Respondents must have an advisor during the live hearing process so that the advisor can pose questions to the opposing party and witnesses.

INVESTIGATION

General Rules of Investigations

In consideration of the traumatic nature of incidents of sexual/physical aggressive/violent behavior, the Title IX Coordinator will conduct a timely review of complaints of sexual misconduct, sex discrimination, domestic violence, dating violence, and/or stalking. Absent extenuating circumstances, review and resolution are expected to take place within a reasonable timeframe.

Casa Loma College and not the parties, has the burden of proof and the burden of gathering evidence, i.e., the responsibility of showing a violation of this policy has occurred. This burden does not rest with either party, and either party may decide not to share their account of what occurred or may decide not to participate in an investigation or hearing. This does not shift the burden of proof away from the College and does not indicate responsibility.

Investigative Team

The Title IX Coordinator is the College's designated officer for conducting or overseeing investigations of alleged violations of this policy. The Title IX Coordinator will designate a team of investigators (the "Investigative Team"), who will tailor an investigation based on the facts, nature, and complexity of the allegations and surrounding circumstances. All investigators will have extensive training in investigating and evaluating conduct prohibited under the policy.

If a complaint concerns the conduct of the Title IX Coordinator or Hearing Officer (or the Title IX Coordinator or Hearing Officer has a conflict of interest), the President shall designate an individual to be responsible for implementing the responsibilities of the Title IX Coordinator or Hearing Officer pursuant to these Title IX Procedures.

The Investigative Team will be impartial and unbiased. The Title IX Coordinator may, in their sole discretion, assign the investigation to appropriate non-Title IX investigator(s) or outside investigator(s). Should a party perceive a potential conflict of interest or bias related to the member(s) of the Investigative Team, the party is expected to promptly raise such conflict in writing to the TC Title IX Coordinator as soon as practicable to allow for appropriate redress.

Fact Gathering

The Investigative Team will gather relevant information from all sources determined necessary for fair resolution of a formal complaint, including interviewing the Complainant, the Respondent, and any other persons with relevant information about the alleged incident(s). The Investigative Team may also review personnel records, documents, and other materials that could prove relevant to the investigation.

The Investigative Team will speak to each party in detail about the allegation(s) and ask each party to identify potential witnesses and/or other evidence to be considered. The parties will have equal opportunity to present fact and expert witnesses and other inculpatory and exculpatory evidence through the course of the investigative process. However, the parties must articulate a reasonable basis to the Investigative Team regarding why their proposed witnesses and/or other suggested evidence are relevant (i.e., will demonstrate that facts material to the allegations under investigation are more or less likely to be true) before the Investigative Team will consider such proposals. Only relevant information will be considered by the Investigative Team, and the Investigative Team retains sole discretion in determining whether the proffered witnesses and/or other evidence are relevant to the allegation(s). The Investigative Team will objectively evaluate all relevant evidence gathered through the course of the investigation.

The parties are expected to submit such evidence and respond to the Investigative Team's evidentiary requests in a timely fashion. Any documents submitted to the Investigative Team for consideration may be referenced in the Investigative Report and as discussed below, will be shared with both parties and the parties' advisors, if applicable. The Investigative Team will work with parties and witnesses to receive evidence from the parties and witnesses. The Investigative Team may wish to question a party regarding certain evidence gathered; in that circumstance, the Investigative Team may share certain evidence with a party in advance of a scheduled meeting to provide a fair opportunity to respond to questions presented during the meeting.

The Investigative Team will inform the parties in writing when the fact-gathering stage of the investigation has concluded. No additional witnesses will be interviewed, and no additional evidence may be submitted to the Investigative Team at that time. Both parties will have equal opportunity to inspect and review all evidence (evidence that tends to prove or disprove the allegations) that was gathered from any source that is directly related to the allegations. Prior to the completion of the investigative report, the Investigative Team will provide each party and the party's advisor, if applicable, the evidence subject to this review in an electronic format. The parties will have ten (10) business days to submit to the Investigative Team a written response to this evidence. Any written response will be considered by the Investigative Team prior to completion of the investigative report.

The Complainant, the Respondent, advisors, and all witnesses may not record any meeting conducted as part of the investigative process, nor copy, photograph, nor improperly disseminate any documents or evidence to which they are afforded access as part of the investigative process.

Evidentiary Rules
In conducting the investigation and drafting the investigative report, the Investigative Team will follow the protocols set forth below:

Preserving Evidence. The Investigative Team will direct the Complainant, Respondent, witnesses, and other interested individuals to preserve any relevant evidence, which may include phone logs, text messages, electronic communications or other evidence relating to the complaint.

Character Witnesses. The Investigative Team will not interview witnesses whose sole purpose is to provide character information.

Romantic or Sexual History in Sexual Assault Cases. The Investigative Team will not consider information concerning the romantic or sexual history of either the Complainant or the Respondent, except from either the Complainant or Respondent regarding their shared sexual history. If either person offers such information, the other will have the right to respond.

[Without exception, all questions and evidence regarding the Complainant's sexual predisposition are deemed irrelevant and prohibited from consideration. Questions and evidence regarding the Complainant's prior sexual behavior are also irrelevant and prohibited, subject to two, limited exceptions: (1) where evidence of prior sexual behavior is offered to prove someone other than the Respondent committed the alleged offense, or (2) where prior sexual behavior evidence is specifically about the parties' shared sexual history and is offered to prove consent.]

Prior Conduct Violations. The Investigative Team may consider the Respondent's prior conduct violations, where the previous incident was substantially like the present allegation(s) and/or the information indicates a pattern of behavior by the Respondent.

Medical Information. Any party's medical, psychological, or similar records cannot be accessed, considered, disclosed, or otherwise used as part of this investigative process without the party's voluntary, written consent. Each party has the right to request that evidence regarding his or her mental health diagnosis and/or treatment be excluded from consideration on the basis that it is not relevant to the allegations.

Legally Recognized Privilege. Any information protected by a legally recognized privilege (e.g., attorney-client) is deemed irrelevant and precluded from consideration throughout the investigative process, unless properly waived by the party maintaining such privilege.

Information from Expert Witnesses. A party may request that information be considered from an expert witness. When such information is deemed relevant to the allegations, the Investigative Team will retain the appropriate expert. Subject to other limitations identified in this policy, the Investigative Team may include in the investigative record medical, forensic, technological, or other expert testimony and materials (such as writings and recordings) that the Investigative Team deems relevant and reliable. The Investigative Team has the discretion to determine the relevance and reliability of any expert testimony and materials, and, accordingly, the Investigative Team will determine what, if any, expert testimony, and materials will be received into the investigative file. The results of polygraph tests and other "lie-detection" techniques will not be considered by the Investigative Team.

Inspection and Review of Evidence

Prior to the completion of the investigation, the parties will have an equal opportunity to inspect and review the evidence obtained through the investigation.

The parties will have ten (10) business days to inspect and review the evidence and submit a short, written response by email which the Investigative Team will consider prior to completion of the Investigative Report.

After receiving the parties' responses, the Investigative Team will then create an Investigative Report that fairly summarizes relevant evidence. The Investigative Report is not intended to catalog all evidence obtained by the Team, but only to provide a fair summary of that evidence.

Only relevant evidence – i.e., tending to prove and disprove the allegations) will be referenced in the Investigative Report. The Investigative Team may redact irrelevant information from the Investigative Report when that information is contained in documents or evidence that is/are otherwise relevant.

The parties and their advisors agree not to photograph or otherwise copy the evidence.

LIVE HEARING

Casa Loma College will not issue a disciplinary sanction arising from an allegation of covered sexual harassment without holding a live hearing, unless otherwise resolved through an informal resolution process.

At least 10 days after the Investigation Report is provided, the Hearing Officer shall convene a live Hearing. The Hearing Officer will provide to the Parties and any witnesses whose participation is invited or expected written notice of the date, time, and manner of the Hearing. All Parties, witnesses and other participants will appear at the live Hearing either ibn-person or virtually, with technology enabling the Hearing Officer and participants to simultaneously see and hear the Party and witnesses answering questions. The College will create an audio or audiovisual recording or a transcript of the Hearing and make it available to Parties for inspection and review upon request. Participants in the live hearing may not record the hearing. Cell phones and recording devices may not be used in the hearing room(s) unless approved by the Hearing Officer in advance.

At the hearing, each Party's Advisor will conduct cross-examination of the other Party and any adverse witnesses. Such cross-examination must be conducted directly, orally, and in real time by the Party's Advisor and never by a Party personally.

Before a Party or witness answers a cross-examination question, the Hearing Officer must determine whether the question is relevant and, if the Hearing Officer refuses to allow a particular question, the Hearing Officer must explain their decision to the Parties and document the reasons for refusal on the record.

Questions and evidence about the Complainant's sexual predisposition or prior sexual behavior are not relevant, unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or if the questions and evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.

If a Party or witness does not submit to cross-examination at the Hearing, the Hearing Officer must not rely on any statement of that Party or witness in reaching a determination regarding responsibility. The Hearing Officer cannot draw an inference about the determination regarding responsibility based solely on a Party's or witness's absence from the live Hearing or refusal to answer cross-examination or other questions.

The Hearing Officer

The Hearing Officer can consist of one individual or a three-member panel. The Hearing Officer(s)is tasked with evaluating and analyzing all relevant information in the Investigative Report, as well as any relevant additional submissions and information presented by the parties in the hearing process. The Hearing Officer(s) determines whether a violation of policy occurred based on the preponderance of evidence standard.

The Hearing Officer(s) will receive regular training on the definition of sexual harassment under Title IX, the scope of the College's education program or activity, how to conduct hearings, and how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of

interest and bias. The Hearing Officer(s) will also receive training on the technology used at the hearing and on issues of relevance of questions and evidence, including when questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not permitted.

Review of Transcript/Recording

The transcript of the hearing will be available for review by the parties within ten (10) business days unless there are any extenuating circumstances. The transcript of the hearing will not be provided to parties or advisors of choice.

DETERMINATION, SANCTIONS AND REMEDIES

Within 14 days following the Hearing, the Hearing Officer(s) shall make a written determination whether a violation of the Title IX Sexual Harassment and Misconduct Policy has occurred and shall simultaneously send the Complainant and the Respondent the written determination and final outcome of the matter, including sanctions, if any, by certified or express mail, electronic mail, or hand delivery. That written determination shall include:

- An identification of the section(s) of the Title IX Sexual Harassment and Misconduct Policy alleged to have been violated;
- A description of the procedural steps taken from the receipt of the complaint through the determination, including any notifications to Parties, interviews with Parties and witnesses, site visits, methods used to gather other evidence, and Hearings held;
- Findings of fact supporting the determination;
- Conclusions regarding the application of the Title IX Sexual Harassment and Misconduct Policy to the facts;
- A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility;
- Any sanctions the College imposes on the Respondent;
- Any remedies provided to the Complainant designed to restore or preserve access to the College's education program or activity;
- A determination of whether the Formal Complaint was knowingly false or malicious; and
- The College's procedures and permissible bases for Parties to appeal.

The determination regarding responsibility becomes final either on the date that the Hearing Officer(s) provides the Parties with the written determination of the result of the appeal, if an appeal is filed, or if an appeal is not filed, the date on which an appeal would no longer be considered timely.

The President is responsible for imposing the sanction.

Sanctions will be decided on a case-by-case basis, must be reasonable and proportionate to the seriousness of the violation, and will be in accordance with College policy. Possible sanctions for employees include, but are not limited to, the following: a letter of reprimand, suspension or leave of absence without pay, reassignment of teaching or other responsibilities, denial of a merit pay increase, demotion, probation, or termination. Sanctions for students include, without

limitation, verbal or written warnings, restrictions, probation, suspension, degree deferral or termination, as well as restrictions on student employment and/or access to College property.

Except as provided herein, sanctions imposed pursuant to these Title IX Procedures may not be appealed or made the subject of a grievance under any other College policy.

Remedial measures for students, faculty and staff w extracurricular activities; tutoring or other academic support; arranging for extra time to complete or re-take a class or withdraw from a class without academic or financial penalty; job reassignment; targeted training for a group of students, faculty or staff; and other remedies that can be tailored to the needs of the Parties. The Title IX Coordinator is responsible for the effective implementation of any remedies.

In the event the charge of Title IX Harassment is not substantiated following the written determination of the Hearing Officer(s), reasonable efforts may be taken to restore the Respondent(s) to their prior status.

RETALIATION PROHIBITED

Retaliation against any person for reporting or complaining of discrimination and/or harassment, assisting or participating in the investigation of a complaint of discrimination and/or harassment, refusing to participate in any manner in an investigation, proceeding or Hearing under these Title IX Procedures or enforcing College Policies with respect to discrimination and/or harassment is strictly prohibited. Overt or covert acts of reprisal, interference, restraint, penalty, discrimination, intimidation, or harassment against an individual or group for exercising rights or performing duties under these Title IX Procedures will be subject to appropriate and prompt disciplinary or remedial action.

APPEAL

The Complainant and the Respondent each have the right to appeal any mandatory or discretionary dismissal as well as the decision of the Hearing Officer(s) and imposition of any sanction to the President. The appeal must be in writing with all supporting materials attached and filed in person, or via postal or electronic mail within ten days of the issuance of notification of the decision. Decisions not appealed within such time are deemed final. The President will notify the other Party in writing when an appeal is filed and furnish a copy of the appeal. Each Party may provide a response to the appeal. The response to the appeal must be in writing with all supporting materials attached and received in person, or via postal or electronic mail within ten days of the issuance of notification of the appeal.

The grounds for appeals are limited to the following:

- Procedural irregularity that affected the outcome of the matter;
- New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; and

- The Title IX Coordinator, Investigator(s), or Hearing Officer(s) had a conflict of interest or bias for or against complainants or respondents generally or the individual Complainant or Respondent that affected the outcome of the matter.

The appeal shall consist of a concise and complete written statement outlining the grounds for appeal and all relevant information to substantiate the basis for the appeal. Appeals are not intended to open a new investigation of the complaint. In most cases, appeals are confined to a review of the written documentation and pertinent documentation regarding the grounds for appeal. The appeal will be conducted in an impartial manner.

The President will issue a decision on the appeal to all Parties involved. Normally this decision will be made within 30 days from the date the appeal was received. The President may (1) uphold or reverse the finding, (2) decrease or increase the sanction(s), and/or (3) take other action as deemed appropriate by the President. The written decision of the President on the appeal shall constitute the College's final action.

TITLE IX COORDINATOR	**PRESIDENT**
Veronica Pantoja, B.A. Director of Human Resources Title IX Coordinator Disability Student Services Coordinator 1st Floor, Room 101 818.78.2726 Ext. 223 veronica.pantoja@casalomacollege.edu	**Dr. Scott Sand** President Campus Director 1st Floor, Room 100 818.785.2726 Ext. 214 scott.sand@casalomacollege.edu

APPENDIX A: DEFINITIONS OF CRIME CATEGORIES

The following definitions come from a variety of sources, including the Department of Education's Handbook for Campus Safety and Security Reporting, and definitions of domestic violence, dating violence, and stalking are adapted from the amendments made to the Violence Against Women Reauthorization Act of 2019;

Aggravated Assault: An unlawful attack by one person upon another for inflicting severe or aggravated bodily injury. This type of assault usually is accompanied using a weapon or by means likely to produce death or great bodily harm.

Arson: Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another kind.

Burglary: The unlawful entry of a structure to commit a felony or a theft.

Dating Violence: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on the length of the relationship, the type of relationship and the frequency of interaction between the persons involved in the relationship.

Domestic Violence: A felony crime of family violence committed between past or present spouses, persons who are parents of the same child, parents and children, stepparents and stepchildren, foster parents and foster children, or other persons living or formerly living in the same household under the family violence laws of the jurisdiction in which the crime of violence occurred; including offenses of battery, simple battery, simple assault, assault, stalking, criminal damage to property, unlawful restraint, or criminal trespass.

Drug Abuse Violations: The violation of laws prohibiting the production, distribution, and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation, or importation of any controlled drug or narcotic substance.

Hate Crimes: A criminal offense committed against a person, property, or society which is motivated in whole or in part, by the offender's bias against a race, religion, disability, sexual orientation, or ethnic/national origin; also known as a bias crime.

Intimidation/Stalking: To unlawfully place another person in reasonable fear of bodily harm using threatening words and/or other conduct but without displaying a weapon or subjecting the victim to actual physical attack. This offense includes stalking.

Liquor Law Violations: The violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of alcoholic beverages, not including driving under the influence and drunkenness.

Motor Vehicle Theft: (does not include theft from a motor vehicle): The theft or attempted theft of a motor vehicle.

Murder and Non-Negligent Manslaughter: The willful (non-negligent) killing of one human being by another.

Manslaughter by Negligence: The killing of another person through gross negligence.

Robbery: The taking, or attempting to take, anything of value from the care, custody, or control of a person or persons by force or threat of force or violence and/by putting the victim in fear.

Sexual Offenses: Any sexual act directed against another person, forcibly and/or against that person's will or not forcibly or against the person's will in instances where the victim is incapable of giving consent.

Rape: (except statutory rape): The carnal knowledge of a person, forcibly and/or against that person's will or not forcibly or against the person's will in instances where the victim is incapable of giving consent because of his/her temporary or permanent mental or physical incapacity.

Fondling: The touching of the private body parts of another person for the purpose of sexual gratification, forcibly and/or against that person's will or not forcibly or against the person's will in instances where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity.

Incest: Non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

Sexual Assault with an Object: To use an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, forcibly and/or against that person's will or not forcibly or against the person's will in instances where the victim is incapable of giving consent because of his/her temporary or permanent mental or physical incapacity.

Sodomy: Oral or anal sexual intercourse with another person, forcibly and/or against that person's will or not forcibly or against the person's will in instances where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity.

Statutory Rape: Sexual intercourse with a person who is under the statutory age of consent.

Weapon Law Violations: The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices, or other deadly weapons.

Arrests or referrals for disciplinary actions regarding any of the following:

Weapon Law Violations: the violation of laws or ordinances dealing with weapon offenses, regulatory in nature, such as manufacture, sale, or possession of deadly weapons; carrying deadly weapons, concealed or openly; furnishing deadly weapons to minors; aliens possessing deadly weapons; all attempts to commit any of the aforementioned.

Drug Abuse Violations: violations of state and local laws relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs. The relevant substances include

opium or cocaine and their derivatives (morphine, heroin, codeine); marijuana; synthetic narcotics (Demerol, methadone); and dangerous nonnarcotic drugs (barbiturates, Benzedrine).

Liquor Law Violations: The violation of laws or ordinance prohibiting: the manufacture, sale, transporting, furnishing, possessing of intoxicating liquor; maintaining unlawful drinking places; bootlegging; operating a still; furnishing liquor to a minor or intemperate person; using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; all attempts to commit any of the aforementioned. (Drunkenness and driving under the influence are not included in this definition.)

Weapon law violations, drug abuse violations, and liquor law violations only need to be reported under the Clery Act if they result in a person being arrested or referred for disciplinary action. A violation of policy that results in a person being referred for disciplinary action but that does not involve a violation of law does not need to be reported.

APPENDIX B: DEFINITIONS OF GEOGRAPHY

Clery Act crimes only need to be reported if they occur: (1) on campus, (2) on public property adjacent to and accessible from on-campus property, or (3) at off-campus buildings or property owned or controlled by the College.

As specified in the Clery Act, the following property descriptions are used to identify the location of crimes on and around Casa Loma College campus.

On-Campus Buildings or Property

1. Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of or in a manner related to the institution's educational purposes, including residence halls; and, any building or property that is within or reasonably contiguous to the area identified in the above paragraph, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or retail/vendor).

Non-Campus Buildings or Property

1. Any building or property owned or controlled by a student organization that is officially recognized by the institution; or any building or property owned or controlled by an institution that is used in direct support of or in relation to the institution's educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.

Public Buildings or Property

All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus or immediately adjacent to and accessible from the campus. Casa Loma College crime statistics do not include crimes that occur in privately owned homes or businesses within or adjacent to the campus boundaries.

APPENDIX C: DEFINITIONS OF REPORTING METHODS

Unfounded: When reported to campus security authorities, but omitted from the crime statistics because they were later determined through investigation by sworn or commissioned law enforcement personnel to have been false or baseless when made

APPENDIX D: CRIME STATISTICS

The information below provides context for the crime statistics reported as part of compliance with the Clery Act. The statistics in this report are published in accordance with the standards and guidelines used by the Clery Act and relevant federal and state law. The statistical information gathered by the Department of Education is available to the public through the DOE website.

- Fire Crime Statistics are not required as the college has no residential facilities.

The Aurora Campus was not required to submit data for the 2024 calendar year.

Aurora Non-Main Campus
3015 S Parker Rd, Building D, Ste 400
Aurora, CO 80014
(800) 270-5052

Web Page: http://www.casalomacollege.edu

Email: info@casalomacollege.edu

© Casa Loma College, Inc. All rights reserved.

From: Aurora (CO) Police Department	Casa Loma College | 3015 S Parker Rd					
Crimes Occurred Jan 1 - Dec 31, 2024	**Campus Property**	**Hate Crimes** Yes if Checked	**Type of Hate Crime**	**Adjacent Public Prop**	**Hate Crimes** Yes if Checked	**Type of Hate Crime**
CRIMES						
Murder/Non-Negligent Manslaughter	**0**	☐	--	**0**	☐	--
Negligent Manslaughter	**0**	☐	--	**0**	☐	--
Sex Offenses Forcible Categories			--			
Rape	**0**	☐	--	**0**	☐	--
Fondling	**0**	☐	--	**0**	☐	--
Incest	**0**	☐	--	**0**	☐	--
Statutory Rape	**0**	☐	--	**0**	☐	--
Sex Offenses Non-Forcible	**0**	☐	--	**0**	☐	--
Robbery	**0**	☐	--	**0**	☐	--
Aggravated Assault	**0**	☐	--	**0**	☐	--
Burglary	**0**	☐	--	**2**	☐	--
Motor Vehicle Theft (not theft from vehicle)	**0**	☐	--	**0**	☐	--
Arson	**0**	☐	--	**0**	☐	--
RELATIONSHIP VIOLENCE (VAWA)						
Domestic Violence	**0**	☐	--	**0**	☐	--
Dating Violence	**0**	☐	--	**0**	☐	--
Stalking (all incidents)	**0**	☐	--	**0**	☐	--
VIOLATIONS resulting in ARRESTS						
Liquor Law Arrests (No Traffic DUI)	**0**	☐	--	**0**	☐	--
Drug Law Arrests (No Traffic DUID)	**0**	☐	--	**0**	☐	--
Illegal Weapons Possession Arrests	**0**	☐	--	**0**	☐	--
Counted ONLY if part of a Hate Crime						
Larceny	**N/A**	☐	--	**N/A**	☐	--
Destruction/Damage/Vandalism of Prop	**N/A**	☐	--	**N/A**	☐	--
Intimidation	**N/A**	☐	--	**N/A**	☐	--
Simple Assault	**N/A**	☐	--	**N/A**	☐	--
Fulfilled By: APD CAIS/ BJM	*Date & Time: 06272025 | 09:52pm*					