



## 2024 Annual Campus Security and Fire Safety Report

Pepperdine University is an independent, medium-sized university enrolling approximately 9,500 students in five schools: Seaver College, Caruso School of Law, Graduate School of Education and Psychology, Pepperdine Graziadio Business School, and School of Public Policy. Each has programs located on the University's 830-acre campus overlooking the Pacific Ocean in Malibu. Pepperdine was founded in 1937 by Mr. George Pepperdine, a Christian businessman who established the Western Auto Supply Company.

Pepperdine University is religiously affiliated with Churches of Christ, of which Mr. Pepperdine was a lifelong member. Faculty, administrators and members of the Board of Regents represent many religious backgrounds, and students of all races and faiths are welcomed. It is the purpose of Pepperdine University to pursue the very highest academic standards within a context that celebrates and extends the spiritual and ethical ideals of the Christian faith.

The Department of Public Safety (DPS) is organized under Meghan McGuire, Director of Public Safety. The Department of Public Safety is committed to providing and maintaining a safe and secure environment while respecting the rights and dignity of individuals utilizing programs and facilities of Pepperdine University. This mission shall be accomplished within the constraints of federal, state and local laws and ordinances.

Specific services include, but are not limited to, 24-hours a day, 365 days a year security patrols, emergency response, threat assessment, building security, parking/traffic enforcement, campus safety escorts, dignitary protection, and dissemination of safety-related information.

### THE CLERY ACT

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act or Clery Act, signed in 1990, is a federal statute that requires all colleges and universities that participate in federal financial aid programs to keep and disclose information about crime on and near their respective campuses.

The law is named after Jeanne Clery, a 19-year-old Lehigh University student who was sexually assaulted and murdered in her campus hall of residence in 1986. The investigation of the murder revealed the assailant gained entry to her residence hall room after passing through three locking doors that had been propped open.

The murder of Ms. Clery triggered a backlash against unreported crime on campuses across the country. The attack was one of 38 violent crimes recorded at Lehigh University in three years, but these incidents were not published. Her parents argued that, had the university's crime record been known, Ms. Clery would not have attended the school. They sued, were awarded \$2 million, and founded Security on Campus, a non-profit group in 1987.

The Department of Public Safety is committed to accurate and prompt reporting for all campuses, which include the Main Campus (Malibu), four separate domestic campuses (Calabasas, Irvine, Washington D.C., West Los Angeles), and five separate international locations (Buenos Aires, Argentina; Florence, Italy; Heidelberg, Germany; Hautevill, Switzerland; and London, England).

Statistics on Clery crimes are collected when they occur in three areas:

1. On campus (with slight reporting distinctions for on campus student housing). The Clery Act defines on campus in part as any buildings or properties that are (a) owned or controlled (by formal or informal agreement) by your college, (b) reasonably contiguous to one another, and (c) is frequented by students and directly support or relate to the college's educational purpose.
2. On public property within or immediately adjacent to the campus, for example, only portions of the sidewalk, street, and sidewalk across from the campus are included as public property. Spaces that touch the campus that are privately owned are not considered public property.
3. In or on non-campus buildings or property that your college owns or controls that is not reasonably contiguous to the main campus and is frequented by students.

Crime statistics for the three most recent calendar years for each of the following crimes that occurred on or within Clery geography that were reported to a local police agency or campus security authority<sup>1</sup>:

1. Murder or Non-Negligent Manslaughter
2. Manslaughter by Negligence
3. Rape
4. Fondling
5. Incest
6. Statutory Rape
7. Robbery
8. Aggravated assault
9. Burglary
10. Motor vehicle theft
11. Arson
12. Domestic Violence
13. Dating Violence
14. Stalking
15. Arrests and Disciplinary Referrals for weapons, drugs, or liquor law violations
16. Unfounded reports

## REPORTING CRIMES AND OTHER EMERGENCIES

Every Pepperdine University student, faculty member, employee or visitor who observes any suspicious or criminal activity, including suspicious persons seen in the parking lots or loitering around vehicles, inside buildings or around the residence halls, should notify personnel employed in the Department of Public Safety. The Department of Public Safety will investigate and, if necessary, refer the matter for investigation by proper authorities. In the event that a situation arises, either on or off

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<sup>1</sup>Appendix 1 - List of Campus Security Authorities

campus that, in the judgment of the University administration and the Department of Public Safety, constitutes an ongoing or continuing threat that may impact the safety of students and employees, an "emergency notification" or "timely warning" will be issued. The warning may be issued through the campus voicemail, email system, text message or printed materials to students, faculty, and staff. Updates may also be made on the University Emergency blog located online at: <http://emergency.pepperdine.edu>.

To report a crime on all domestic campuses, call 911 and if safe, next call the Department of Public Safety at (310) 506-4441. For non-emergencies call (310) 506-4442. Additionally, on the Malibu campus, one may pick up the handset on any Blue Light telephones located throughout campus and be immediately connected to the Department of Public Safety. Reports can be made to the Department of Public Safety in person, over the phone, or through the LiveSafe App. The Department of Public Safety is located on the Malibu campus on the first floor of the Center for Communication and Business building, below the Seaver Drive / President's Drive intersection on the Malibu campus. Individuals located on other campuses, should contact local law enforcement and/or the program director. In addition, you may report a crime to the following areas: Office of Student Affairs, Human Resources, and the Dean's Office for each of the various schools of Pepperdine University.

#### CONFIDENTIAL REPORTING

Individuals who are the victim of a crime and do not want to pursue action within the University's internal procedures or the criminal justice system may still consider making a confidential report. To anonymously report information to the Department of Public Safety, please call the Anonymous Wave Tip Line at (310) 506-7623, use the on-line form at: <https://www.pepperdine.edu/publicsafety/8-report-a-concern/>, or the anonymous reporting option on the LiveSafe App. The Student Health Center (except the director), Counseling Center (except the director), and University Chaplains are also available to take confidential reports. Please be aware that California law requires prompt mandatory reporting to the local law enforcement agency by health care practitioners when they provide medical services to a person they know or reasonably suspects is suffering from wounds inflicted by a firearm or is a result of assaultive or abusive conduct. The purpose of a confidential report is to comply with the victim's wish to keep the matter confidential, while taking steps to ensure the future safety of the campus community. California Law, AB 1433, requires all California colleges and universities to immediately (or as soon as practically possible) notify the campus police or local law enforcement when a student or employee reports a violent crime (willful homicide, forcible rape, robbery, or aggravated assault), any sexual violence or the threat of any of sexual violence, or any hate crime committed because of another person's disability, gender, nationality, race or ethnicity, religion, sexual orientation, or association with a person or group with any of these characteristics. This notification can be made without the names of the parties involved.

#### EMERGENCY NOTIFICATION

The University will notify the campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or staff occurring on the campus, 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. In appropriate circumstances, faculty, staff and students will receive information sent directly to them via an emergency notification system, email, or communication from co-workers, supervisors, or Emergency Response Team (ERT) members. The emergency communication system allows the University to send messages directly to community members. These messages can be sent to email; cell, office, and home telephones; SMS/text message; and designated emergency contacts. The system is dependent upon the contact information provided in the WaveNet Portal by each individual. This system is only used for testing and emergency communications. Periodic testing of the system is conducted.

#### PREPARATION AND REPORTING OF ANNUAL CRIME AND FIRE STATISTICS

The Department of Public Safety, along with designated University employees from the Office of Community Standards, International Programs, Title IX officers, and local graduate campuses, and with the assistance of local law enforcement officials, collect and compile campus crime statistics and post these findings on the the Department of Public Safety website to comply with the Clery Act.

This information is available at the Pepperdine homepage at [www.pepperdine.edu](http://www.pepperdine.edu). The website address for this report is emailed annually to current students and employees. Copies of this report are also available at the Department of Public Safety or by calling (310) 506-4700. All prospective employees may obtain a copy from Human Resources in Thornton Administrative Center or by calling (310) 506-4397. The Crime Log is also available by contacting the Department of Public Safety at (310) 506-4700 during business hours or viewing the incidents occurring in the last 60 days on the Department of Public Safety website when posted.



## Malibu Campus

24255 Pacific Coast Highway

Malibu, California 90263

United States

Phone - (310) 506-4000

### SECURITY, CRIME, AND FIRE INFORMATION

At the Malibu campus, closed-circuit television technology is utilized for security purposes. Emergency telephones are available at campus entrances, the Main lot (B), the Phillips Theme Tower Lot (A), the Firestone Fieldhouse lot (P), the Stotsenberg Track, the Rho lot (J), Stauffer Chapel lot (C), Law Student lot (F), Terraced lot (I), Drescher parking lots, throughout the residential community, and all campus building elevators. These phones have been strategically placed throughout the campus to expedite requests for the Department of Public Safety assistance. A fire alarm monitoring system for all on campus housing areas and campus buildings has been installed in the Department of Public Safety communication center, which is staffed 24-hours a day. Intrusion alarms have been installed at various locations on campus to increase security protection. Many doors, including all doors throughout the student living area, are keyed with a card access key system. This electronic security device allows for the deactivation of lost keys and audit of all keys used in a particular lock.

The Malibu campus provides on-campus housing for approximately 1,800 undergraduate students and provides on-campus housing for approximately 250 graduate students. There are approximately 100 faculty and staff living on campus. Students are encouraged to keep all residential areas locked 24-hours a day. Additionally, exterior doors in the student housing standard residence halls are equipped with alarms in the event the door is left open. These alarms are monitored remotely at the Department of Public Safety's communication center. The Department of Public Safety officers patrol the student housing areas on a regular basis. All vehicles on campus must be registered with the Department of Public Safety, or a one-day parking pass must be obtained at one of the information/security booths located at the entrances to the campus. Permits are to be displayed while the vehicle is parked on University property. Access to the campus is screened 24-hours a day, seven days a week. After 5:30pm on weekdays, weekends, and holidays drivers must prepare to present a valid permit and/or articulate a valid reason to access the campus.

The following security considerations are used in the maintenance of the campus facilities: 1) annual tests for fire and panic alarms, 2) monthly tests for emergency and blue light phones throughout campus, and 3) repairs requiring access to a living area by non-university individuals, residents are notified in advance or the individuals are escorted by University representatives into the living area.

#### LAW ENFORCEMENT AUTHORITY AND INTERAGENCY RELATIONSHIPS

Public safety personnel, designated as first responders, receive training, including CPR/First aid/AED, fire and police response. They also have opportunities for additional specialized training related to their assignment. The Department of Public Safety personnel have the authority to impose a citizen's arrest and to detain individuals until local law enforcement arrives. The Department of Public Safety has an ongoing working relationship with local law enforcement agencies in providing updated information, joint investigations, and training.

#### CRIME AWARENESS AND CRIME PREVENTION PROGRAMS

In addition to patrolling the Malibu campus 24-hours a day, The Department of Public Safety sponsors a variety of crime prevention and safety programs for students and employees at the Malibu campus.

Additionally, the graduate campus and international program campuses have crime awareness and crime prevention programs. The following are crime prevention programs available at the Malibu campus:

Security Escort Program – Public safety officers provide security escorts by foot or in a vehicle 24-hours a day to ensure safe arrival between two points on campus.

Crime Prevention – The Department of Public Safety provides information on crime prevention topics that include rape, auto burglary, residential burglary, property thefts, etc. on the website. The Department of Public Safety also makes timely reports to members of the campus community regarding occurrences of criminal activity. Students, faculty, and staff are encouraged to be responsible for their own security and the security of others.

Life Safety/Security Inspection Report – Resident assistants perform inspections of student residential housing areas ensuring that the lighting, shrubbery, doors, windows, and fire safety equipment are properly maintained.

The LiveSafe App – This application is designed to improve communication between the University community members and the Department of Public Safety, and allows for faster emergency response in distress situations. The app is free and available to all members of the community: students, faculty, staff, parents, visitors, and friends. Through LiveSafe, individuals can submit information and chat with the Department of Public Safety in both emergency and non-emergency situations, and they can look out for their friends and loved ones by watching them get to their destination safely with SafeWalk. If an individual needs a medical or security escort on the Malibu campus or a ride back to the Malibu campus, they can call the Department of Public Safety using the SafeRide feature. When an individual submits a tip, they can attach a photo, video, or audio clip, and they can submit all of this information



anonymously if they choose. And, when an individual uses LiveSafe to call 911 or contact the Department of Public Safety in an emergency, the app can track their location, which helps first responders know exactly where help is needed. The University has also loaded critical information resources into the app, so individuals now have emergency response information and contact information for key University services at their fingertips from any location.

**Safe Ride Program** – This program was developed in cooperation with the Seaver College Dean of Student Affairs to discourage driving under the influence of alcohol or other unsafe situations. Students should call the Department of Public Safety when concerned about driving or being a passenger in a vehicle operated by an impaired driver. Appropriate arrangements will be made based on the situation. This is not a confidential service.

**Crime Prevention Notices** – The Department of Public Safety personnel leave notices to building users when doors, windows, or property are not properly secured. Administrators and students are notified if there appears to be a recurring problem. The Department of Public Safety also provides timely notice to the campus community of ongoing or continuing threats to aid in the prevention of similar occurrences.

#### CRIMINAL ACTIVITY OFF CAMPUS

Student Affairs maintains contact with recognized fraternity, sorority, and all other student organizations through the efforts of the Student Activities office. These organizations do not have off campus "Greek houses." Off campus criminal activity, related to the Malibu campus, is monitored and recorded by the Los Angeles County Sheriff's Department, Los Angeles Police Department, FBI, and the California Highway Patrol, as appropriate. Student Affairs and the Department of Public Safety maintain a close working relationship with these agencies when violations of federal, state or local law arise.

#### ANNUAL FIRE REPORT AND SAFETY STATISTICS

Because the Malibu campus maintains on-campus student housing, the University publishes an annual fire safety report. This report is viewable by following this link:

<http://www.pepperdine.edu/publicsafety/department/safety/>. This report includes the following data for each student housing facility:

1. The number and causes of each fire
2. The number of fire-related injuries resulting in treatment in a medical facility
3. The number of fire-related deaths
4. The value of property damage caused by a fire

#### CAMPUS HOUSING FIRE LOGS

The University maintains a log of all campus student-housing fires, including the nature, date, time, and general location of each fire, which logs are updated and are made available for inspection by the campus community during normal business hours. Two business days are required for a request for any portion of the log older than sixty days.

## ON CAMPUS FIRE SAFETY SYSTEMS

In 2009, fire alarm systems in all undergraduate housing areas were replaced with new addressable state of the art technology, enhancing central monitoring capabilities.

## DRILLS

California Code requires owners of buildings of specific occupancies, such as schools, to conduct annual evacuation drills during normal business hours. The Department of Public Safety annually conducts emergency evacuation drills in an effort to prepare the campus community for dealing with an actual emergency, and to test the University's emergency planning and infrastructure. The Department of Public Safety conducts these drills building-by-building which allows designated building Emergency Response Team (ERT) members to interact with public safety, faculty, staff and students in providing evacuation information and direction to selected safe refuge areas.

## POLICIES AND RULES

Malibu, California- In the interest of providing a safe and secure environment and demonstrating compliance with California fire codes, the University expects all residents to comply with the standards described in this section. Residents found in violation of the Fire Safety standards may be subject to a minimum \$100 fine per incident and disciplinary action. Repeated violations of the Fire Safety standards may result in dismissal from the residential community.

Open Flame Policy- The possession or use of candles (with or without wicks, burned or unburned) will result in disciplinary action, including confiscation and/or other sanctions. With the exception of approved appliances, the University prohibits burning open flames, incense, fireworks, and personal barbecues, in any living area at any time. Any acts that place the community at risk of fire are prohibited.

Electrical Safety- Additionally, fire hazards such as halogen lamps, appliances with exposed heating elements (e.g. toasters), and other items considered unsafe in a residential environment are strictly prohibited in or around any living area. The use of string lights (Christmas lights) is only permitted between Thanksgiving and Christmas. Light fixtures in the residential community should never be obstructed or covered by any material. Residents may not cover their walls beyond what is permitted by the fire code with material that will create a fire hazard, such as cardboard or cloth. Covering public area couches and chairs with fabric is prohibited. Powered appliances, surge protectors and extension cords should not be used in violation of manufacturers' specifications (e.g., using multiple extension cords with multiple plugs in one outlet, plugging a surge protector into another surge protector). Fire hazards found in the residential community will be immediately confiscated; in most cases, items that have been confiscated will not be returned.

Fire Doors and Windows- Due to California Code, doors within the residence halls, except for the bedroom doors, are fire doors. Lobby, hallway, laundry, and suite doors must not be propped open. Locks and doors, including bedroom doors, should never be tampered with to impede the proper function of the lock, such as taping the locking mechanism against the doorframe. To enable fire or



other emergency personnel access to a room during an emergency, residents are not allowed to block access to windows by placing furniture at window height in front of windows.

**Fire Equipment-** The firefighting equipment and alarm systems were installed for the protection of the residents and their property. County fire regulations make it illegal to tamper with fire equipment. Tampering with this equipment including, but not limited to: fire alarms, propped door alarms, fire extinguishers, hoses, fire sprinkler heads, smoke detectors, mechanical bells, and fuse boxes may result in a \$500 fine, immediate dismissal from the residential community, and possible criminal prosecution. Residents are not permitted to hang any items from smoke detectors or mechanical bells. Failure to comply will result in disciplinary action. Residents are not permitted to hang any items (including clothes hangers) from ceiling fire sprinklers in any residential facility. Hanging items from sprinklers could result in flooding. The resident will be financially responsible for any water damage caused by activation of the sprinklers.

## SMOKING

Pepperdine is a smoke-free campus environment. Research demonstrates that tobacco smoke is a health hazard to both smokers and non-smokers. According to the Surgeon General, cigarette smoking is the leading preventable cause of illness and premature death in the United States. Non-smokers who are exposed to environmental (secondhand) smoke also face an increased risk of illness or disease as there is no safe amount of secondhand smoke – any exposure poses a health risk. The American Cancer Society estimates that secondhand smoke kills 46,000 people per year. As of 2011, nearly 141,000 cigarette-ignited fires occur in the United States each year. E- cigarettes have been an unregulated method of nicotine delivery within polyethylene glycol vapor, and with varied odorants/flavors. This vapor is dispersed locally upon exhalation. Though the health risks associated with this vapor are currently unknown, they are being evaluated by the Food and Drug Administration. In the interest of public health and courtesy, the University prohibits e-cigarettes and vaping.

All Pepperdine University campuses are smoke-free at all times and smoking, including e-cigarettes, is strictly prohibited. This prohibition includes, but is not limited to, the interior of University facilities, outdoor areas, and undeveloped property, as well as in any vehicle owned, leased, or operated by the University. Also, the sale, distribution, and advertisement of, or sponsorship by tobacco products is prohibited anywhere on campus, at University-sponsored events, or in publications produced by the University. This policy applies to all persons on the Pepperdine University campus.

Increased subsidized cessation programs will be made available to faculty, staff, and students. The University encourages participation in these programs. For more information, employees should call Human Resources, and students should call their dean's office.

All members of the University community share in the responsibility of adhering to and enforcing this policy. The success of this policy depends upon the thoughtfulness, consideration, and cooperation of those who smoke and those who do not. Informational rather than punitive enforcement is the intent of this policy. However, repeated violations of the smoking policy, such as smoking on campus other than at a designated smoking location, may result in intervention by the Department of Public Safety,

discipline by the supervisor in the case of an employee, or discipline by the applicable dean's office in the case of a student.

Education & Training- DPS provide fire safety training sessions to resident advisors, resident directors, and the Special Programs summer staff annually. Each session covers general fire safety, fire prevention and how to avoid false alarms. Emergency Response Team (ERT) members and faculty/staff homeowners may also be provided fire safety training. Also the Department of Public Safety Fire Safety officers provide fire safety presentations or information to individuals or groups upon request.

List of names and position titles of the individuals, and phone numbers, of the person(s) students and employees should contact in case of an emergency or a crime on campus:

1. Call 911
2. DPS 310-506-4441
3. Meghan McGuire, Director of Public Safety, 310-506-6051
4. Ariel Sarreal, Assistant Director, 310-506-7226

#### LOCAL POLICE

27050 Agoura Rd.

Calabasas, CA 91301

(818) 878-1808

<https://lasd.org/malibu-lost-hills/>

#### ALCOHOL AND MARIJUANA LAWS

The drinking age in California is 21. In general, beer, wine, and liquor can be purchased at licensed facilities, including grocery stores. The sale of alcoholic beverages in the state of California can occur weekly between the hours of 6 a.m. and 2 a.m. every day, including Sunday.

Those who are 21 years or older are able to possess up to 28.5 grams (g) of marijuana flower and up to 8 grams (g) of marijuana concentrate. Additionally, adults are allowed to possess up to six living cannabis plants within their private residence.

Medicinal marijuana can be obtained by individuals over 18, with a medical marijuana card.

Alcohol and marijuana are not allowed on campus or for use during any University function. Individuals over 21 can consume alcohol off campus, but not become intoxicated.

2021 - 2023 Annual Clery Crime Statistics  
 Malibu Campus  
 24255 Pacific Coast Highway  
 Malibu, California 90263  
 United States  
 Ph (310) 506-4000

Offense	Year	On Campus	Student Housing	Non-Campus	Public Property	Total Crimes
Murder or Non-Negligent Manslaughter	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Manslaughter by Negligence	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Rape	2023	10	10	0	0	10
	2022	3	3	0	0	3
	2021	2	2	0	0	2
Fondling	2023	5	2	0	0	5
	2022	7	2	0	0	7
	2021	3	3	0	0	3
Incest	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Statutory Rape	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Robbery	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Aggravated Assault	2023	1	0	0	0	1

	2022	0	0	0	0	0
	2021	0	0	0	0	0

Burglary	2023	11	2	0	0	11
	2022	9	1	0	0	9
	2021	16	4	0	0	16
Motor Vehicle Theft	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Arson	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Hate (Bias) Crimes	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Domestic Violence	2023	1	1	0	0	1
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Dating Violence	2023	1	1	0	0	1
	2022	2	0	0	0	2
	2021	1	0	0	0	1
Stalking	2023	1	0	0	0	1
	2022	0	0	0	0	0
	2021	1	0	0	0	1

Weapons, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

Drug Related, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Liquor Law, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Weapons, Disciplinary Referrals	2023	1	0	0	0	1
	2022	0	0	0	0	0
	2021	2	2	0	0	2
Drug Related, Disciplinary Referrals	2023	11	9	0	0	11
	2022	10	10	1	0	11
	2021	7	7	0	0	7
Liquor Law, Disciplinary Referrals	2023	40	38	0	0	40
	2022	27	27	0	0	27
	2021	19	19	0	0	19
Unfounded Reports	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

2023 Annual Fire Log and Fire Safety Information  
 Malibu Campus  
 24255 Pacific Coast Highway  
 Malibu, California 90263  
 United States  
 Ph (310) 506-4000

**Statistics and Related Information Regarding Fires**

Year	Total Fires	Cause of Fire	Number of Injuries That Required Treatment at a Medical Facility	Total Fire-Related Deaths	Property Damage/Loss Caused by Fire*	
2023	0	-	-	-	-	
2022	0	-	-	-	-	
2021	0	-	-	-	-	

**Fire Safety Drills and Systems**

Residential Facility	Number of Drills	Fire Sprinkler System	Fire Extinguishers	Addressable Fire Alarm System	Smoke Detectors	Smoke Detectors Tied in Alarm and Central Monitoring System
1, Conner Hall	1	No	Yes	Yes	Yes	Yes
2, Phillips Hall	1	No	Yes	Yes	Yes	Yes
3, E. Pengilly Hall	1	No	Yes	Yes	Yes	Yes
4, Peppers Hall	1	No	Yes	Yes	Yes	Yes
5, Hayes Hall	1	No	Yes	Yes	Yes	Yes
6, White Hall	1	No	Yes	Yes	Yes	Yes
7, Fifield Hall	1	No	Yes	Yes	Yes	Yes
8, Pauley Hall	1	No	Yes	Yes	Yes	Yes
Rockwell Towers	1	Yes	Yes	Yes	Yes	Yes
10, Crocker Hall	1	No	Yes	Yes	Yes	Yes
11, J. Pengilly Hall	1	No	Yes	Yes	Yes	Yes



12, Knott Hall	1	No	Yes	Yes	Yes	Yes
13, Eaton Hall	1	No	Yes	Yes	Yes	Yes
14, Darnell Hall	1	No	Yes	Yes	Yes	Yes
15, Miller Hall	1	No	Yes	Yes	Yes	Yes
16, DeBell Hall	1	No	Yes	Yes	Yes	Yes
17, Banowsky Hall	1	No	Yes	Yes	Yes	Yes
Krown Alpha Hall	1	No	Yes	Yes	Yes	Yes
Krown Beta Hall *demolished as of July 2023	0	No	Yes	Yes	Yes	Yes
Shafer Hall	1	No	Yes	Yes	Yes	Yes
Eden House	1	No	Yes	Yes	Yes	Yes
Lovernich Apartments	1	No	Yes	Yes	Yes	Yes
Drescher Student Apartments	1	Yes	Yes	Yes	Yes	Yes
George Page Apartments I	1	No	Yes	Yes	Yes	Yes
George Page Apartments II	1	Yes	Yes	Yes	Yes	Yes
Seaside Hall	1	Yes	Yes	Yes	Yes	Yes

**\*Value Ranges for Estimated Property Damage Due to Fire**

\$0 – \$99	\$50, 000 – \$99,999
\$100 – \$999	\$100,000 – \$249,999
\$1,000 – \$9,999	\$250,000 – \$499,999
\$10,000 – \$24,999	\$500,000 – \$999,999
\$25,000 – \$49,999	>\$1,000,000



## Calabasas Campus

26750 Agoura Road  
Calabasas California 91302  
United States  
Ph (818) 702-1000

### SECURITY, CRIME, AND FIRE INFORMATION

The Calabasas campus began holding classes on May 5, 2018. There are over one hundred employees working at the Calabasas campus. The property is owned by the Cypress Land Company but managed by Pepperdine University. The academic space is primarily on the first floor on the south side of the building and staff work on the 2nd floor & the warehouse on the 1st floor.

The facility is open Monday to Thursday, 8am to 10pm, Friday 8am to 9:30pm, and Saturday 8am to 5:30pm, and the front door is locked during operating hours with only designated employees who may enter, using their ID card and pin. The receptionist at the front desk welcomes students, employees, and guests and verifies their business on campus. The Department of Public Safety provides an officer during Monday - Thursday from 2pm to 11pm, Fridays 3:30pm to 10pm and Saturdays from 8am to 6pm. They regularly patrol all internal areas of the building/campus as well as the external parking lot.

The facility has access control on all doors and a 24-hour monitored CCTV system that can be managed by the Department Public Safety in Malibu.

The staff are trained in CPR/First Aid/AED and have attended Active Shooter Response Training, Fire/Life/Safety training, and are members of Pepperdine's Emergency Response Team (ERT). Staff also inspect/update all the emergency equipment, fire extinguishers, AEDs, flashlights, emergency barrels, first aid kits, ERT backpacks on regularly scheduled intervals. All staff participate in annual fire drills performed by the Department of Public Safety. There are emergency evacuation plans posted throughout the campus with guidelines to become familiar with all exits, know where fire extinguishers are located, and how to evacuate the building and to proceed to the evacuation assembly area location.

Confidential reporting may be done through the Livesafe App or using the “Report a Concern” button on the Human Resources of the Department of Public Safety website. There is also a comment box in the academic mailroom in CAL 141.

List of names and position titles of the individuals, and phone numbers, of the person(s) students and employees should contact in case of an emergency or a crime on campus:

1. Call 911
2. DPS 310-506-4441
3. Crystal Cabral, Calabasas Campus Manager: 626-807-4873
4. Erin Di Cesare, Director, Real Estate Operations: 818-631-1978
5. Greyson Orellana, Associate Director, Human Resources: 951-526-7619
6. Shizue Kleinman, Campus Coordinator, 818-702-1002
7. Maya Nutley, Lead Campus Coordinator: 818-702-1000

#### LOCAL POLICE

LASD Malibu/Lost Hills Sheriff's Station  
27050 Agoura Road  
Agoura, CA 91301  
(818) 878-1808  
<https://lasd.org/malibu-lost-hills/>

2023 Annual Clery Crime Statistics  
 Calabasas Campus  
 26750 Agoura Road  
 Calabasas California 91302  
 United States  
 Ph (818) 702-1000

Offense	Year	On Campus	Student Housing	Non-Campus	Public Property	Total Crimes
Murder or Non-Negligent Manslaughter	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Manslaughter by Negligence	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Rape	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Fondling	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Incest	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Statutory Rape	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Robbery	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Aggravated Assault	2023	0	n/a	0	0	0

	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0

Burglary	2023	1	n/a	0	0	1
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Motor Vehicle Theft	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Arson	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Hate (Bias) Crimes	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Domestic Violence	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Dating Violence	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Stalking	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0

Weapons, Arrests	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0

Drug Related, Arrests	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Liquor Law, Arrests	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Weapons, Disciplinary Referrals	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Drug Related, Disciplinary Referrals	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Liquor Law, Disciplinary Referrals	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Unfounded Reports	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0





## Encino Campus

16830 Ventura Blvd, Suite 200  
Encino, California 91436  
United States  
Ph (818) 501-1600

### **CLOSURE OF CAMPUS**

**The Encino Graduate Campus was closed May 2022.**

#### SECURITY, CRIME, AND FIRE INFORMATION

The Encino Graduate Campus (EGC) is accessible to students, faculty, staff and visitors during Campus hours: Monday - Thursday 9am - 10:30pm, Fridays 9am-10:30pm and Saturday 8am- 5pm. During that time, the front door to the suite is unlocked and propped open unless campus staff need to leave the desk to attend to various campus matters. All classrooms and offices remain locked when not in use. After hours, the resident faculty & staff have key fobs/keys/parking card keys and may gain access to the campus. The building managers (Douglass Emmett) have security cameras installed at the elevators, parking structure/elevators, at the emergency exits and inside the elevators. All who enter EGC pass by the coordinators desk. The desk is staffed by the Campus Coordinator or Campus Director. The EGC makes every effort to have at least one staff member at the front desk for the majority of time, especially during high traffic times. Necessary duties require staff to step away from time to time and during that time a sign is posted stating where to receive assistance. As people come into the Campus, they are welcomed and their business confirmed to be on campus. All perimeter doors remain locked, except for the Community Clinic separate entrance, Suite 216. It remains unlocked during clinic hours and opens to a waiting room with a closed window and locked door. Access is granted by clinic staff when they recognize those in the waiting area. Clinic staff may interact with guests through the sliding glass window.

#### FACILITY SECURITY MAINTENANCE

The EGC campus staff reviews campus locations including classrooms, offices, study & conference room, IT/Library, faculty student lounges, Community Clinic, all hallways and common spaces. When lights need to be replaced, a service request is submitted and Douglass Emmett's Building Engineer/maintenance personnel replace bulbs/ballasts as necessary. All lighting in the building

hallways, common areas, restrooms, parking structure, and building signage is monitored and maintained by campus staff on a regularly scheduled basis. Building manager engineers (Douglass Emmett) also monitor and repair/replace items as required. All the lights in the exterior of the building and the parking lots are managed by Douglass Emmett. Campus staff may submit reports of observed lights needing repair/replaced. Requests are responded to typically within 4 hours and no later than 24 hours. Douglass Emmett's staff's Security Personnel monitor building perimeter, parking, and guests coming into the building. After hours, Douglass Emmett provides a perimeter security system, camera monitoring with four hours of taped interactions, and locks down elevator banks (fob access required).

## SECURITY PRACTICES AND TRAINING

Each of the Campus Coordinators ("Coordinators") along with the Campus Director have been trained in CPR/First aid/AED, have attended Active Shooter training and Fire/Life/Safety training, and are members of Pepperdine's Emergency Response Team (ERT). The Coordinators are also Suite Monitors for Douglass Emmett Building Management. As a regular practice, the Director requires the Coordinators to review the Pepperdine Emergency procedures. We also check/update all the emergency equipment, fire extinguishers, AEDs, flashlights, emergency barrels, first aid kits, ERT backpacks, charge and test SAT phone, etc at regularly scheduled times. Each of the Coordinators & the Director have participated in Annual Fire Drills that are performed by Douglass Emmett. There are lighted Emergency Exit Signs posted throughout the Campus; in common areas, in each classroom, in the faculty and student lounges, etc. Classrooms and public campus areas, Community Clinic has emergency exit maps posted throughout the campus. The maps include routes to the outside safe refuge area, the locations of emergency exits, fire extinguishers, & alarms as well as emergency numbers (911 and Pepperdine's DPS). Campus staff are entered into the Everbridge notification system for emergency response alerts/updates. Annual fire safety training/fire drills are conducted by Douglass Emmett where campus ERT team members attend/participate/and report back findings. ERT team conducts a debriefing following any incident for learning and improvement.

List of names and position titles of the individuals, and phone numbers of the person(s) students and employees should contact in case of an emergency or a crime on campus:

1. Call 911
2. DPS (310) 505-4441
3. Building Security (818.497.4408)
4. Harold Taylor, director (323.252.1023)
5. Nicolle Taylor, Chief Business Officer (310.413.2233)

## LOCAL POLICE

West Valley LAPD Station

19020 Vanowen St.

Reseda CA, 91335

(818) 374-7611

[http://www.lapdonline.org/inside\\_the\\_lapd/content\\_basic\\_view/6279](http://www.lapdonline.org/inside_the_lapd/content_basic_view/6279)

2023 Annual Clery Crime Statistics  
Encino Campus  
16830 Ventura Blvd, Suite 200  
Encino, California 91436  
United States  
Ph (818) 501-1600

CAMPUS CLOSED AS OF MAY 2022

Offense	Year	On Campus	Student Housing	Non-Campus	Public Property	Total Crimes
Murder or Non-Negligent Manslaughter	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Manslaughter by Negligence	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Rape	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Fondling	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Incest	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Statutory Rape	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Robbery	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0

Aggravated Assault	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0

Burglary	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Motor Vehicle Theft	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Arson	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Hate (Bias) Crimes	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Domestic Violence	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Dating Violence	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Stalking	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0

Weapons, Arrests	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0

	2021	0	n/a	0	0	0
Drug Related, Arrests	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Liquor Law, Arrests	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Weapons, Disciplinary Referrals	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Drug Related, Disciplinary Referrals	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Liquor Law, Disciplinary Referrals	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Unfounded Reports	2023	n/a	n/a	n/a	n/a	n/a
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0



## Irvine Campus

18111 Von Karman Avenue  
Irvine, California 92612  
United States  
Ph (949) 223-2500

### SECURITY, CRIME, AND FIRE INFORMATION

The Irvine Graduate campus (IGC) is accessible to students, faculty, staff and visitors during Campus hours Monday-Thursday 8am-10:30pm, Friday 8am-9:30pm, Saturday 7:30am-5:30pm and Sunday 12pm-7pm. During that time, the lobby entrance and elevators are accessible to 2nd, 3rd and 4th floors. After hours, the lobby entrance and elevators are locked down and an assigned card key is needed to enter the building and elevators. The reception desk is staffed by the Office of Graduate Campuses staff during regular business hours. Lakeshore Towers (building management) has 24 hours/ 7 days a week security service (Allied University Security) and monitors cameras installed at the elevators, parking structure/elevators and lobby entrances. The outdoor stairs to the 2nd floor glass doors remain locked.

The Irvine staff walk through the facility daily to assess the maintenance needs. Irvine staff place service requests to the Lakeshore Towers (building management) to replace all burnt out light bulbs or other needed repairs or replacements. The University is responsible for supplying the light bulbs and ballasts. All common area lighting is maintained and serviced by the building management with regular inspections.

The Irvine staff are trained in CPR/First Aid/AED and have attended Active Shooter Response training, Fire/Life/Safety training, are members of Pepperdine's Emergency Response Team (ERT) as well as being suite monitors for Lakeshore Towers management. The Irvine staff also inspect/update all the emergency equipment, fire extinguishers, AEDs, flashlights, emergency barrels, first aid kits, ERT backpacks on regularly scheduled intervals. All Irvine staff participate in annual fire drills performed by Lakeshore Towers management. There are emergency evacuation plans posted throughout the campus with guidelines to become familiar with all exits, know where fire extinguishers are located, how to evacuate the building and proceed to the evacuation assembly area location. Building management also circulates security information.



After reporting the emergency as described above, on campus students, faculty and staff follow instructions from on site security and property management, and floor wardens who are trained in the property's established emergency procedures for evacuations and sheltering in place as appropriate. The campus floor wardens are also the campus coordinators who work with the faculty, staff and students to provide timely campus notifications to the Department of Public Safety at 310.506.4441, and campus managers Adam Carnes (Real Estate Operations) and Greyson Orellano (HR). Mr. Carnes and Mr. Orellana work with the property managers and on site coordinators to clarify communications to University officials at the two schools (GSEP and PGBS), University Administration, and the Department of Public Safety.

List of names and position titles of the individuals, and phone numbers of the person(s) students and employees should contact in case of an emergency or a crime on campus:

1. Call 911
2. DPS (310) 506-4441
3. Campus Coordinator Desk (949) 223-2500
4. Adam Carnes, Irvine Campus Real Estate Operations Manager: 818-702-1321
5. Greyson Orellana, Associate Director, Human Resources: 310-506-4441

#### LOCAL POLICE

1 Civic Center Plaza

P.O. Box 19575

Irvine, CA 92623-9575

(949) 724-7000

Email: [ps@cityofirvine.org](mailto:ps@cityofirvine.org)

[www.irvinepd.org](http://www.irvinepd.org)

2023 Annual Clery Crime Statistics  
Irvine Campus  
18111 Von Karman Avenue  
Irvine, California 92612  
United States  
Ph (949) 223-2500

Offense	Year	On Campus	Student Housing	Non-Campus	Public Property	Total Crimes
Murder or Non-Negligent Manslaughter	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Manslaughter by Negligence	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Rape	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Fondling	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Incest	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Statutory Rape	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Robbery	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0

Aggravated Assault	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0

Burglary	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Motor Vehicle Theft	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Arson	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Hate (Bias) Crimes	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Domestic Violence	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Dating Violence	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Stalking	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0

Weapons, Arrests	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0

	2021	0	n/a	0	0	0
Drug Related, Arrests	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Liquor Law, Arrests	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Weapons, Disciplinary Referrals	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Drug Related, Disciplinary Referrals	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Liquor Law, Disciplinary Referrals	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Unfounded Reports	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0



## West Los Angeles Campus

6100 Center Drive, Suite 200  
Los Angeles, California 90045  
United States  
Ph (310) 568-5717

### SECURITY, CRIME, AND FIRE INFORMATION

The EQ Office property management company monitors access at the West Los Angeles (WLA) campus 24 hours a day, 7 days a week. The WLA campus is accessible to students, faculty, staff and visitors Monday through Friday from 7:00am to 11:00pm, Saturday 8:00am to 5:30 pm, and Sunday 12:00pm to 7:00pm. During these times, the lobby elevators and entrance permit access to all floors 2, 3, 4 and 5 inside the building (with the exception of floors 4 and 5 on Sundays). Anyone requiring access at times other than those stated must have a security access cardkey. The security officers will escort Pepperdine community members to their vehicles whenever requested. The property and building access points are monitored by surveillance cameras. The security officer at the console in the lobby is responsible for monitoring the cameras. In addition, security patrols the campus and parking garage perimeter. Additional cameras monitor the loading dock, and the fire stairwell that exits onto Park Terrace Drive.

On the individual floors occupied by Pepperdine University, the suite receptionists are the first line of control to recognize potential intruders. Additionally, the employees and the day porter have a visible presence, monitor the space during regular business hours, and maintain contact with the EQ Office security team.

Access to office suites at the WLA campus is controlled by Identocard Security and monitored by the Office of Graduate Campuses (OGC). The cardkey used is the same issued by the property management for parking, building and elevator access. The custodial staff adheres to the policy regarding access to office space. The occupant of the space has a key and under no circumstances will custodial staff be required to unlock a door or permit anyone into the office while performing their duties. They are required to report suspicious persons immediately. Upon separating from the University, the employee supervisor is obligated to inform the OGC so that the cardkey can be

deactivated. Overnight parking is not allowed unless authorized by the management office. Vehicles left in the parking garage longer than 24 hours without the required “Overnight Parking Pass” are subject to be towed.

The campus staff, including custodial staff, conduct a daily inspection of the facility and report and repair or replacement needs. Routine maintenance of lighting is the responsibility of the building management. The building management team, including the building engineers, parking management, building security and custodial crew, all play a crucial role in maintenance security/life safety of the building community. In addition, the Pepperdine community is encouraged to report any outages or suspicious activities on the campus and the information is communicated to the property management team.

The safety and security of the campus is a high priority, but individual’s must do their part. The OGC provides leadership for WLA Campus Safety as well as promotes and contributes to security through preparation and response to emergencies. The OGC encourages all members of the community to use the many resources to protect themselves. Building security provides 24-hour general assistance, including the security escort program and information that has an impact on the campus community is reported to Pepperdine’s Department of Public Safety. Excellent working relationships with stakeholders and partners, Los Angeles Police Department and property management furthers security goals.

The campus community has access to useful information on Pepperdine website in the event of an emergency and as a reminder about good safety habits. In addition, emergency preparedness guides/brochures with safety tips are distributed among students and the Campus community as an added resource as well as paper postings. Active Shooter Response Training has been integrated as part of Active Shooter Preparedness and emergency response for the community.

Constituents participate and attend training for CPR/First Aid and AED as well as Fire/Life Safety Training and Evacuation Drill.

List of names and position titles of the individuals, and phone numbers of the person(s) students and employees should contact in case of an emergency or a crime on campus:

1. Call 911
2. DPS (310) 506-4441
3. Building Security (310) 641-2907
4. Chaundra Pierce / Marco Huerta, Campus Coordinators (310) 568-5717
5. Adam Carnes, Real Estate Manager (818) 702-1321
6. Greyson Orellana, Associate Director, Human Resources (951) 526-7619
7. Erin Di Cesare, Director, Real Estate Operations (818) 631-1978
8. Lisa Stone, Executive Director, Business Services (562) 686-3399

#### LOCAL POLICE

LAPD, Pacific Division Station



12312 Culver Blvd.  
Los Angeles, CA 90066  
(310) 482-6334  
<https://www.lapdonline.org/>

2023 Annual Clery Crime Statistics  
West Los Angeles Campus  
6100 Center Drive, Suite 200  
Los Angeles, California 90045  
United States  
Ph (310) 568-5717

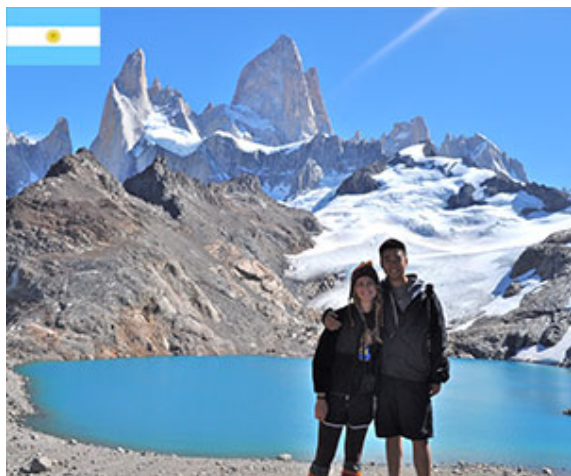
Offense	Year	On Campus	Student Housing	Non-Campus	Public Property	Total Crimes
Murder or Non-Negligent Manslaughter	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Manslaughter by Negligence	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Rape	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Fondling	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Incest	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Statutory Rape	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Robbery	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0

Aggravated Assault	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0

Burglary	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Motor Vehicle Theft	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	2	2
Arson	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Hate (Bias) Crimes	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Domestic Violence	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Dating Violence	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Stalking	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0

Weapons, Arrests	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0

	2021	0	n/a	0	0	0
Drug Related, Arrests	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Liquor Law, Arrests	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Weapons, Disciplinary Referrals	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Drug Related, Disciplinary Referrals	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Liquor Law, Disciplinary Referrals	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Unfounded Reports	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0



## Buenos Aires Campus

11 de Septiembre 1888 955, 1426 CABA

Buenos Aires, Argentina

Ph (+54) 11-4772-5969

U.S. Embassy

Av. Colombia 4300, CABA

(C1425GMN) Buenos Aires

Argentina

(+54) 011 5777-4533

<https://ar.usembassy.gov>

### SECURITY, CRIME, AND FIRE INFORMATION

The Casa Holden entrance is only accessible through fingerprint (or fob in case an individual's fingerprint does not work). Students and employees may access the facility from the Casa Holden entrance, not the Olleros entrance. Both Entrances have call buttons that directly dial the local police. Student fingerprint access is authorized from 7am to 11pm and permanent staff fingerprint access is 24 hours. Claudio Bibiloni (who lives in Casa Olleros) completes evening security rounds at 11pm most nights of the week; otherwise, Jorge Carnaval (Security Consultant) performs the rounds. Students are not typically permitted to leave after 11pm without notifying Claudio or the faculty family (in Casa Holden) to let them out. Two emergency exit doors allow egress at all times, but are only used in an emergency. The doors are secured 24/7 and a manual key to the main door is in the possession of Claudio, the live-in faculty family, and Director Hill-Weber. There are security personnel in the building. There is also a monthly visit by the safety and hygiene officer as well as an annual work plan set by the municipality.

As a primary procedure, a police officer is stationed in a guard box in front of the main entrance of Casa Holden during the day, and during the night he moves to a guard box in front of Casa Olleros. As a secondary procedure, the security guard makes random rounds during the 24 hours of the day. The change of having one officer per shift was made in September 2014. Along with that change, four cameras were placed in the entrances of Olleros and Casa Holden.

The BA Program has Housekeepers who do daily routine checks, and the Security Manager supervises the police shifts and also checks the property regularly and especially during the weekends. In the event of an emergency, alarms will sound inside the buildings.

At the beginning of each semester, the students receive a Safety Orientation, and during Fall 2018 the group also went to the American Embassy to participate in a security briefing with the American

Citizen Services and Security sections. Relevant information regarding security is also included in the Student Handbook. It includes:

1. Conduct an international travel safety session that discusses personal and community safety at the stateside orientation
2. Offer free self-defense and situational awareness classes
3. Provide In-country safety briefings when students arrive at their location. This includes:
  - a. Emergency contact procedures and information
  - b. What to do in specific types of emergencies / security situations
  - c. Facility rules to safeguard the complex and its students
  - d. Local security concerns and how to mitigate them
4. Emergency plans that cover a multitude of scenarios
5. Individual critical incident protocols
6. Alcohol awareness training in Malibu and at IP locations
7. Smoking is prohibited
8. Students have access to a travel assistance program that provides students with select emergency assistance offerings and briefings about countries they are planning to visit.
9. Instruct students to use the Live Safe App
10. Fire safety and drills at program locations
11. Train students in how to fill in the travel log so all student travel is tracked and students can receive real-time safety updates
12. Train resident advisors in how to handle security issues

#### CONTACT THE FOLLOWING INDIVIDUALS IN CASE OF FIRE

1. Travis A. Hill-Weber (Director)
2. María Constanza Guerrini (Assistant Director)
3. Harmony Hill-Weber (Coordinator of Student Affairs and Spiritual Life)
4. Resident Advisors

As of August 2024, the Buenos Aires Campus is currently working with a local contractor on the installation of a new commercial, wireless fire safety system.

#### CONTACT THE FOLLOWING INDIVIDUALS IN CASE OF EMERGENCY

1. Travis A. Hill-Weber (Director) +54 911-5156-1793
2. María Constanza Guerrini (Assistant Director) +54 911-5247-0602
3. Harmony Hill-Weber (Coordinator of Student Affairs and Spiritual Life) +54 911-2318-8517
4. Resident Advisors

#### EVACUATION PROCEDURES

1. If it is during office hours, contact the staff.
2. If it is during the evening, contact Claudio, the maintenance employee who is living at Casa Olleros and the policeman who is in front of Casa Holden.
3. If you are not able to contact them, call 911.
4. Evacuate the building as quickly and safely as possible, following the Evacuation Procedures.

5. Go to the primary meeting place:
  - a. Primary: Students have to go to their homestays.
  - b. Visiting Faculty and maintenance employees to one of the hotels. Staff will let them know which hotel they have to go.

Hotel Finisterra  
Báez 248  
248finisterra.com  
+5411 4773-0901

Hotel Espacia Suites  
Amenábar 1135, C1426AJS CABA  
espaciasuites.com  
+5411 4786-8687

6. Once the evacuation is complete, initiate the Student, Faculty and Staff Communication Plan. If warranted, initiate the Parent Communication Plan.
7. Notify International Programs: As soon as possible, the Director or staff members will notify the Dean or Director of the International Programs Malibu Office. If unavailable, call the Department of Public Safety (1-310-506-4441, available 24/7).
8. Housing: N/A. Students will stay at their homestay.
  - a. If Casa Holden and Casa Olleros cannot be safely inhabited for a short period (e.g., one month or less), initiate the Short-Term Closure Plan (see Section IV) and find provisory classrooms and offices.
  - b. If Casa Holden and Casa Olleros are uninhabitable for a longer period, initiate the Long-Term Closure Plan (see Section V) and find spaces for classrooms and offices.
9. Work with the International Programs Office to facilitate necessary repairs: The International Programs Office will consult with the Office of Risk and Insurance to determine whether the damage will be covered by insurance.
10. Restore security and connectivity.

#### LOCAL POLICE AGENCY

Comisaría Vecinal 14-B  
Dirección: CABILDO AV. 232  
Teléfonos: 4771-3333 /4773-3315  
<http://www.policiadelaciudad.gob.ar>  
Ex: Comisaría 31

#### LOCAL ALCOHOL AND MARIJUANA LAWS

Law 24.788, prohibits in all the national territory, the sale to minors of eighteen years, of all types of alcoholic beverages.

Law 23,737, of September 1989, provides for the possession of narcotic drugs the penalty of one to six years in prison and one month to two years in prison when, due to their small amount and other circumstances, it unequivocally suggests that possession is for personal use.  
Campus policies are the same as in Malibu.



2023 Annual Clery Crime Statistics  
 Buenos Aires Campus  
 11 de Septiembre 955  
 CABA  
 Ph (+54) 4772-5969

Offense	Year	On Campus	Student Housing	Non-Campus	Public Property	Total Crimes
Murder or Non-Negligent Manslaughter	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Manslaughter by Negligence	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Rape	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Fondling	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Incest	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Statutory Rape	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Robbery	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Aggravated Assault	2023	0	n/a	0	0	0

	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0

Burglary	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Motor Vehicle Theft	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Arson	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Hate (Bias) Crimes	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Domestic Violence	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Dating Violence	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Stalking	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0

Weapons, Arrests	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0

Drug Related, Arrests	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Liquor Law, Arrests	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Weapons, Disciplinary Referrals	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Drug Related, Disciplinary Referrals	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Liquor Law, Disciplinary Referrals	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0
Unfounded Reports	2023	0	n/a	0	0	0
	2022	0	n/a	0	0	0
	2021	0	n/a	0	0	0

2023 Annual Fire Log and Fire Safety Information  
Buenos Aires Campus  
11 de Septiembre 955  
CABA  
Ph (+54) 4772-5969

**Statistics and Related Information Regarding Fires**

Year	Total Fires	Cause of Fire	Number of Injuries That Required Treatment at a Medical Facility	Total Fire-Related Deaths	Property Damage/Loss Caused by Fire*
2023	0	0	0	0	\$0
2022	0	0	0	0	\$0
2021	0	0	0	0	\$0

**Fire Safety Drills and Systems**

Residential Facility	Number of Drills	Fire Sprinkler System	Fire Extinguishers	Addressable Fire Alarm System	Smoke Detectors	Smoke Detectors Tied in Alarm and Central Monitoring System
Buenos Aires Campus - Casa Holden	2	No	Yes	Yes	Yes	Yes
Buenos Aires Campus - Casa Olleros	2	No	Yes	Yes	Yes	Yes

As of August 2024, the Buenos Aires Campus is currently working with a local contractor on the installation of a new commercial, wireless fire safety system.

**\*Value Ranges for Estimated Property Damage Due to Fire**

\$0 – \$99	\$50, 000 – \$99,999
\$100 – \$999	\$100,000 – \$249,999
\$1,000 – \$9,999	\$250,000 – \$499,999
\$10,000 – \$24,999	\$500,000 – \$999,999
\$25,000 – \$49,999	>\$1,000,000



## Florence Campus

Viale Milton 41, 50129 Florence, Italy  
Ph +39 055 474120

### U.S. Embassy

Via Vittorio Veneto, 121, 00187 Roma RM, Italia

Phone number: +39 06 46741

<https://it.usembassy.gov/it/embassy-consulates-it/rome-it>

### U.S. Consulate General

Lungarno Vespucci, 38

50123 Firenze

Phone: (+39) 055.266.951

## SECURITY, CRIME, AND FIRE INFORMATION

The Florence program facility has three accesses: Viale Milton 41 (main student access), Via Landino 15 (guests access) and Via Landino 11 (food suppliers access). The door in Viale Milton 41 can be opened only with a code. There is no key to open the door. The code to this door is only given to the students, professors and staff members and they are told to keep the code strictly confidential for safety reasons. Via Landino 15 is used by guests during office hours for administrative purposes. Students do not use this entrance. This door is regularly locked at the end of the workday and is unlocked the following day. Via Landino 11 is a gate used by food suppliers and technical staff. The gate can be opened from the office whenever a supplier needs to enter and ring the doorbell. Video cameras are installed on the top of all these doors (and a fourth one inside the courtyard).

A local armed security guard service, Coop Servizi, checks all three entrances of the Villa at night from 11:00 PM to 7:00 AM.

Security considerations regarding the maintenance of the program facility are completed in the following ways:

1. SIRTE (the electricity company) checks all fire and gas detectors every six months. Sirte also checks all electrical panels and fuses every six months.
2. CABER company performs a check on all the fire cutter doors, extinguishers, magnets and emergency water hoses every six months.
3. SIRTE also performs an annual check on the whole system (additional to the one listed above), lamps, sockets, air conditioning, wires and overall electrical stream.

An emergency slide show is presented to students providing an orientation on all types of emergencies, in addition to the program handbook that includes:

- Conducting an international travel safety session that discusses personal and community safety at the stateside orientation
- Offering free self-defense and situational awareness classes
- Providing In-country safety briefings when they arrive at their location. This includes:
  - Emergency contact procedures and information
  - What to do in specific types of emergencies / security situations
  - Facility rules to safeguard the complex and its students
  - Local security concerns and how to mitigate them
- Emergency plans that cover a multitude of scenarios
- Individual critical incident protocols
- Alcohol awareness training in Malibu and at IP locations
- Students have access to a travel assistance program that provides students with select emergency assistance offerings and briefings about countries they are planning to visit.
- Instructing students to use the Live Safe App
- Fire safety and drills at program locations
- Training students in how to fill in the travel log so all student travel is tracked and students can receive real-time safety updates
- Training resident advisors in how to handle security issues

Students and employees can report a criminal offense by contacting:

1. The local police force from any phone in the villa or by cell phone. The Police contact number is pre-programmed on every phone in the villa and the call is free of charge.
2. If the Program Director is contacted, the director will contact the local authorities
3. If a crime occurs outside our office hours, the Faculty Family or the RAs will contact the local authorities
4. If there is problems with the language our students can contact anyone that is on our emergency card and they can call the local police

In the Florence program, smoking, candles (any type of open flame), or portable electrical appliances are not allowed. Students are advised during orientation that a fire drill will occur and that they need to exit the building when we do the fire drill. The director, faculty family, resident advisors and the student representatives always receive a clipboard with the rooming list subdivided into four groups, plus the life vest and a whistle. The drill facilitator makes sure that everyone is accounted for. There is one drill per semester and the students know if the alarm goes off again they should act as if we have a fire.

The following is a list of procedures that should be followed in the event of an emergency in Villa Di Loreto or Residenza Tagliaferri. The safety of all students, faculty and staff should be the primary goal of any emergency situation.

There is one organized fire drill per semester within the first two weeks of the semester. When the alarm sounds off in the Villa or the residence, all students, faculty and staff should evacuate the premises immediately. Students leaving the residence should make sure that their roommates have heard the alarm and are also leaving the building. When leaving their rooms, students should close the

door behind them. All fire doors close automatically. All students, faculty and staff should leave the premises through the door on Viale Milton or the two gates, via the courtyard on Via Landino, or the door by the piano on Via Landino. In order to facilitate the roll call, students assemble near roommates. After leaving the villa, all students, faculty and staff should meet across the street on Via Landino. Roll is called by the facilitator. The Program Director, or designee, serves as the official spokesperson during an emergency. When it is safe to do so, the Program Director will announce that students, faculty and staff can return to the villa and residence.

In case of open flames students should report to the Fire Department immediately using one of any of the house phones. The Fire Department phone is pre-programmed and the phone call is free of charge.

The following people holding the position title below, should be notified that a fire occurred in the student residence area after the incident:

1. Director (During office hours), Elizabeth Whately
2. Academic and Facilities Coordinator, Valentina Nocentini

A new water cistern in the courtyard was installed a few years ago, as requested by the Fire Department in compliance with the security law, and additional work has been done on the skylight to allow air and smoke to be released from the skylight.

#### CONTACT THE FOLLOWING INDIVIDUALS IN CASE OF EMERGENCY

1. Elizabeth Whatley - Program Director, phone +39 335 62 07 534
2. Faculty Family - contact number changes each academic year
3. Giulia Mencaraglia - Program Assistant +39 3394490778
4. Valentina Nocentini - Academic Coordinator +39 3667442733
5. Weekend Coordinator - contact number changes each weekend

#### LOCAL POLICE

Polizia di Stato

Via Zara 2

50129 Firenze

Phone: +39 055 49771

<https://questure.poliziadistato.it/it/Firenze>

Carabinieri Viale Dei Mille 66

50129 Firenze

Phone: +39 055 573079

<https://www.carabinieri.it/>

#### LOCAL ALCOHOL AND MARIJUANA LAWS

Italian law states that alcoholic beverages cannot be served or sold to anyone who is under the age of 18. Drugs possession and use are prohibited by State law

The policy regarding possession, use and sale of alcoholic beverages are the same as in Malibu. In addition, if a student purchases any alcohol during his/her stay in Florence, he/she must bring it to the Program Office until his/her departure to the States. The policy regarding the possession, use and sale of illegal drugs, is the same as in Malibu.



2023 Annual Clery Crime Statistics  
 Florence Campus  
 Viale Milton 41, 50129 Florence  
 Italy  
 Ph +39 055 474120

Offense	Year	On Campus	Student Housing	Non-Campus	Public Property	Total Crimes
Murder or Non-Negligent Manslaughter	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Manslaughter by Negligence	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Rape	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Fondling	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Incest	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Statutory Rape	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Robbery	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

Aggravated Assault	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

Burglary	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Motor Vehicle Theft	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Arson	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Hate (Bias) Crimes	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Domestic Violence	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Dating Violence	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Stalking	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

Weapons, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0

	2021	0	0	0	0	0
Drug Related, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Liquor Law, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Weapons, Disciplinary Referrals	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Drug Related, Disciplinary Referrals	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Liquor Law, Disciplinary Referrals	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Unfounded Reports	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

2023 Annual Fire Log and Fire Safety Information  
 Florence Campus  
 Viale Milton 41, 50129 Florence  
 Italy  
 Ph +39 055 474120

**Statistics and Related Information Regarding Fires**

Year	Total Fires	Cause of Fire	Number of Injuries That Required Treatment at a Medical Facility	Total Fire-Related Deaths	Property Damage/Loss Caused by Fire*
2023	0	0	0	0	\$0
2022	0	0	0	0	\$0
2021	0	0	0	0	\$0

**Fire Safety Drills and Systems**

Residential Facility	Number of Drills	Fire Sprinkler System	Fire Extinguishers	Addressable Fire Alarm System	Smoke Detectors	Smoke Detectors Tied in Alarm and Central Monitoring System
Florence Campus - Villa di Loreto	3	No	Yes	Yes	Yes	Yes
Florence Campus - Residenza Tagliaferri	3	No	Yes	Yes	Yes	Yes

**\*Value Ranges for Estimated Property Damage Due to Fire**

\$0 – \$99	\$50,000 – \$99,999
\$100 – \$999	\$100,000 – \$249,999
\$1,000 – \$9,999	\$250,000 – \$499,999
\$10,000 – \$24,999	\$500,000 – \$999,999
\$25,000 – \$49,999	>\$1,000,000



## Hauteville Campus

Chemin des Boulingrins 10  
1806 Blonay - St. Legier  
Switzerland  
Ph +41213210909

U.S. Embassy  
Sulgeneckstrasse 19  
CH-3007 Bern, CH;  
Ph +41 31 357 70 11  
<https://ch.usembassy.gov/embassy/bern/>

U.S Consulate  
Rue François-Versonnex 7, 1207 Geneva

Dufourstrasse 101, 3rd floor, 8008 Zurich

### CAMPUS OPENING

**The Hauteville Campus opened September 2023 and replaced the Lausanne Campus. Clery statistics are available in the 2024 Clery Annual Security Report.**

### SECURITY, CRIME, AND FIRE INFORMATION

Access to the Hauteville Campus is completed by the use of a key card. Doors automatically close themselves, and students are not allowed to open the door for strangers (only staff may do this). Family and friends may only visit during visitation hours, and must sign the guestbook and be introduced to the Director or Assistant Director. Resident advisors perform a nightly "lock-up" at 10:00pm at which they walk the entire building, checking doors and windows to ensure they are closed and locked. Students will access the spaces in the Château and Orangerie by using a special access application and their cell phones. The application and access instructions will be provided to students during program orientation. Any student providing their cell phone to a non-program participant will be immediately dismissed from the program for security reasons. Program staff will be available for 24-hour support to assist students with access challenges if their phones are lost, damaged, or stolen.

Surveillance rounds are performed at night (3) and more on Fridays, Saturdays and Sundays (5-6 pm and 8-9pm). The security guards check only the exterior of the buildings, the entrance (if they are locked as they should be) and the estate. Security guards are not armed.

The perimeter of the building is mostly monitored by cameras. There is lighting on the exterior by all doors. All burned out lights or other maintenance needs are identified by resident advisors during their lock-ups, or by the maintenance staff, and replaced. All maintenance call-outs have to be scheduled

and announced. The technicians ring at the entrance gate and then at the building exterior doors. No access badge is given to any outside employees or technicians. All technicians are escorted by one of our employees to the area where maintenance needs to happen. Students/employees are always informed when we have technicians on site (where, for how long, etc.).

At the beginning of each semester, the program director provides an extended session in orientation on safety. All safety aspects of the building and access, with regard to going out into the evenings, and related to students' travel on weekends are discussed. Responsible decision making regarding alcohol consumption, caring for someone who has over-consumed alcohol, protecting oneself and others against assault, responding to sexual assault, and responding in the case of a violent attack which occurs in close proximity is also discussed.

The following are policies or rules regarding the following items in the residence where students live:

1. There is one organized fire drill each semester.
2. Portable electrical appliances, such as a hot pot are not allowed.
3. Smoking is not allowed anywhere on the Hauteville Campus.
4. Open flames are not allowed anywhere on the Hauteville Campus.

Each semester, in the first days of the semester, students learn the protocol (which exits to use, which fire doors to leave closed, where to locate fire extinguishers, where the outside gathering point is, etc.) and there is a fire drill where all students evacuate. A representative from the fire alarm vendor engages the alarms, exits are located, and staff inspects each siren. Faculty are trained at the start of the year to lead students out of the classroom and out of the building.

As soon as they hear the alarm, they must evacuate the building and go to the meeting point. They should close doors behind them. If possible, they should alert everybody on their way out. During evenings, nights and weekends, the fire alarm will start as soon as any danger occurs. During working hours, we have an indirect alarm that allows us to first check the hazard and decide if we need to set the evacuation alarm on and to alert the firefighters. We have one person responsible for all fire safety procedures (Lorianne Forest) and all employees are trained about all those procedures (for direct and indirect modes of the alarm).

In case of an emergency alarm (fire), the firefighters will be alerted automatically. For any medical emergency, we will call an ambulance. If an ambulance is not necessary, we will drive our student / employee to the closest healthcare center or hospital. For any criminal emergency, we will call the police. If a fire is small and is observed, the fire extinguishers should be used to put the fire out. The director, assistant director should be notified immediately and the Fire Department (if needed to evaluate the area) will be called. If the fire is large, the fire alarm button (one on each floor) should be pressed, which will automatically notify the Fire Department. When the alarm sounds all students should exit the building immediately. They should leave all belongings where they are, grab a coat (if they are in their room, and it is winter), and evacuate the building in an orderly manner. They should not open fire doors which separate the building into sectors. They should exit the building and proceed

to the gathering point. The following people holding the position title below, should be notified that a fire occurred in the student residence area after the incident:

1. Lorianne Forest, Director of Operations

There are no current plans for future improvements in fire safety, as determined necessary by the institution.

#### CONTACT THE FOLLOWING INDIVIDUAL(S) IN CASE OF EMERGENCY

1. Ezra Plank, Executive Director, phone +41 76 422 25 37
2. Anais Perez, Coordinator of Student Life, +41 79 576 35 82
3. Rafael Zulian, Program Assistant, +41 78 964 03 01
4. Lorianne Forest, Director of Operations +41 79 945 32 12

#### LOCAL POLICE

Police Riviera - Association Securite Riviera  
Rue du Lac 118, Case postale  
1815 Clarens, Switzerland  
Phone: +41 21 966 83 00  
[securite.riviera.ch/home/police](http://securite.riviera.ch/home/police)

#### LOCAL ALCOHOL AND MARIJUANA LAWS

All people may buy and consume beer and wine when they have reached 16 years old. At 18 years old, all people may purchase and consume any type of alcohol, including hard alcohol. The blood alcohol limit in Switzerland is .05, and it is illegal to sell alcohol after 10:00pm.

Cannabis products with tetrahydrocannabinol (THC) are banned under Swiss narcotics legislation, while cannabidiol (CBD) products are not (although products made from cannabis plants that contain very little THC - less than one per cent - can be bought and sold legally). Adults who consume cannabis illegally face a fixed penalty fine of CHF 100. There is no penalty for the possession of 10 grams or less of cannabis.

The Hauteville Campus' policy on alcohol and marijuana is the same as Malibu: students are not allowed to possess, use, or sell illegal drugs or alcohol in the facilities or any sponsored event.

2023 Annual Clery Crime Statistics  
Hauteville Campus  
Chemin des Boulingrins 10  
1806 Blonay-St-Légier  
+41 21 321 09 09

Offense	Year	On Campus	Student Housing	Non-Campus	Public Property	Total Crimes
Murder or Non-Negligent Manslaughter	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Manslaughter by Negligence	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Rape	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Fondling	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Incest	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Statutory Rape	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Robbery	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a



Aggravated Assault	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a

Burglary	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Motor Vehicle Theft	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Arson	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Hate (Bias) Crimes	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Domestic Violence	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Dating Violence	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Stalking	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a

Weapons, Arrests	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Drug Related, Arrests	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Liquor Law, Arrests	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Weapons, Disciplinary Referrals	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Drug Related, Disciplinary Referrals	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Liquor Law, Disciplinary Referrals	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a
Unfounded Reports	2023	0	0	0	0	0
	2022	n/a	n/a	n/a	n/a	n/a
	2021	n/a	n/a	n/a	n/a	n/a

2023 Annual Fire Log and Fire Safety Information  
Hauteville Campus  
Chemin des Boulingrins 10  
1806 Blonay-St-Légier  
+41 21 321 09 09

**Statistics and Related Information Regarding Fires**

Year	Total Fires	Cause of Fire	Number of Injuries That Required Treatment at a Medical Facility	Total Fire-Related Deaths	Property Damage/Loss Caused by Fire*
2023	0	0	0	0	\$0
2022	n/a	n/a	n/a	n/a	n/a
2021	n/a	n/a	n/a	n/a	n/a

**Fire Safety Drills and Systems**

Residential Facility	Number of Drills	Fire Sprinkler System	Fire Extinguishers	Addressable Fire Alarm System	Smoke Detectors	Smoke Detectors Tied in Alarm and Central Monitoring System
Château d'Hauteville	3	No	Yes	Yes	Yes	Yes

**\*Value Ranges for Estimated Property Damage Due to Fire**

\$0 – \$99	\$50, 000 – \$99,999
\$100 – \$999	\$100,000 – \$249,999
\$1,000 – \$9,999	\$250,000 – \$499,999
\$10,000 – \$24,999	\$500,000 – \$999,999
\$25,000 – \$49,999	>\$1,000,000



## Heidelberg Campus

Graimbergweg 10  
69117 Heidelberg  
Germany  
Ph +49 6221 90250

U.S. Embassy  
Pariser Platz 2, 10117 Berlin  
+49 30 83050  
<https://de.usembassy.gov/>

U.S. Consulate  
Gießener Str. 30  
60435 Frankfurt am Main  
Federal Republic of Germany  
Tel.: +49-69-7535-0

### SECURITY, CRIME, AND FIRE INFORMATION

Access to enter Moore Haus is gained by use of a security code. Students are instructed not to give the code to anyone not living in the house. There are security cameras on the premises monitored both from the Heidelberg campus and also accessible by the Department of Public Safety in Malibu.

There are smoke detectors in all of the rooms in Moore Haus. These are very effective and have functioned when necessary. All students living in Moore Haus are asked to report any lights that need to be changed. A student employee also is in charge of checking the lights and other maintenance needs throughout the entire house. Also, the program assistant does this regularly.

Security practices and procedures are addressed extensively in orientation. Student safety is one of the Heidelberg international program's main concerns and goals. In addition to everything stated above, on the first floor of Moore Haus, there is a blue box marked Hausalarm with a button to press which alerts the Badischer Sicherheitsdienst. This is a security firm contracted by the Heidelberg international program that will come to Moore Haus within 15 minutes (sometimes less) in the case of any emergency in which a student cannot get in touch with a person in charge on the premises.

The following are policies or rules regarding the following items in the residence where students live:

1. There is one fire organized fire drill each semester.
2. Portable electrical appliances: Tablets, smartphones and portable computers are allowed in Moore Haus and on the premises.
3. Smoking: Forbidden in Moore Haus and only allowed in one restricted area outside of the house.

4. The presence of open flames is forbidden in Moore Haus and forbidden on the premises outside of the house.

The students are given safety instructions on their first tour of Moore Haus on the day they arrive and then once again a few days later by a fire instructor who comes to the house and explains everything in detail once again. At this time, a fire drill is implemented. The student handbook also mentions the following: If the fire alarm goes off, please proceed swiftly to the meeting point outside of the main entrance and then follow the instructions given to you there.

In case of a fire, any person present in Moore Haus should immediately proceed to the meeting point.

All students have the fire department's phone number and the directors' phone number. These numbers should be called immediately by the visiting faculty or a resident advisor or anyone else if those listed are not present in the house when the alarm goes off.

The following people holding the position title below, should be notified that a fire occurred in the student residence area after the incident:

1. Melissa Swann, Program Director +49 160 6646575
2. Eyal Pinkas, Manager of Operations and Student Care +49 176 56980096

Moore Haus was renovated and fire safety was extensively discussed with the architects as well as the company (Fire Check), which provides maintenance for the fire extinguishers and who are also in charge of fire safety. The fire safety plan reflects the requirements of the City of Heidelberg, but the goal is to constantly work on improving and fine-tuning the Heidelberg International Program's fire safety.

#### CONTACT THE FOLLOWING INDIVIDUAL(S) IN CASE OF EMERGENCY

1. Melissa Swann, Program Director +49 160 6646575
2. Christina Wuttke, Acting Director +49 174 6157208
3. Eyal Pinkas, Manager of Operations and Student Care +49 176 56980096

#### LOCAL POLICE

Polizeirevier Heidelberg-Mitte  
Römerstraße 2-4, 69115 Heidelberg  
Phone +49 6221 991700  
<https://ppmannheim.polizei-bw.de/>

#### LOCAL ALCOHOL AND MARIJUANA LAWS

Drinking beer and wine are legal as of the age of 16. Drinking liquor is legal as of the age of 16. The possession and use of marijuana are illegal in Germany.

The policy regarding the possession, use and sale of illegal drugs or alcohol on the Heidelberg campus is identical to the one on the Malibu campus.

2023 Annual Clery Crime Statistics  
 Heidelberg Campus  
 Graimbergweg 10  
 69117 Heidelberg  
 Germany  
 Ph +49 6221 90250

Offense	Year	On Campus	Student Housing	Non-Campus	Public Property	Total Crimes
Murder or Non-Negligent Manslaughter	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Manslaughter by Negligence	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Rape	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Fondling	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Incest	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Statutory Rape	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Robbery	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

Aggravated Assault	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

Burglary	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Motor Vehicle Theft	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Arson	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Hate (Bias) Crimes	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Domestic Violence	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Dating Violence	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Stalking	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

Weapons, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0

	2021	0	0	0	0	0
Drug Related, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Liquor Law, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Weapons, Disciplinary Referrals	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Drug Related, Disciplinary Referrals	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Liquor Law, Disciplinary Referrals	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Unfounded Reports	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0



2023 Annual Fire Log and Fire Safety Information  
 Heidelberg Campus  
 Graimbergweg 10  
 69117 Heidelberg  
 Germany  
 Ph +49 6221 90250

**Statistics and Related Information Regarding Fires**

Year	Total Fires	Cause of Fire	Number of Injuries That Required Treatment at a Medical Facility	Total Fire-Related Deaths	Property Damage/Loss Caused by Fire*
2023	0	0	0	0	\$0
2022	0	0	0	0	\$0
2021	0	0	0	0	\$0

**Fire Safety Drills and Systems**

Residential Facility	Number of Drills	Fire Sprinkler System	Fire Extinguishers	Addressable Fire Alarm System	Smoke Detectors	Smoke Detectors Tied in Alarm and Central Monitoring System
Tower Annex	2	No	Yes	Yes	Yes	No
1st Floor: Admin/Kitchen	2	No	Yes	Yes	Yes	No
2d Floor: Faculty & Library	2	No	Yes	Yes	Yes	No
3d Floor: Women's Floor	2	No	Yes	Yes	Yes	No
4th Floor: Men's Floor	2	No	Yes	Yes	Yes	No

**\*Value Ranges for Estimated Property Damage Due to Fire**

\$0 – \$99	\$50, 000 – \$99,999
\$100 – \$999	\$100,000 – \$249,999
\$1,000 – \$9,999	\$250,000 – \$499,999
\$10,000 – \$24,999	\$500,000 – \$999,999
\$25,000 – \$49,999	>\$1,000,000



## Lausanne Campus

Av. Marc-Dufour 15  
1007-Lausanne CH  
Switzerland  
Ph +41213210909

U.S. Embassy  
Sulgeneckstrasse 19  
CH-3007 Bern, CH;  
Ph +41 31 357 70 11  
<https://ch.usembassy.gov/embassy/bern/>

### CAMPUS CLOSURE

**The Lausanne Campus closed at the end of the Spring 2023 semester with classes at the new Hauteville Campus, which began September 2023.**

### SECURITY, CRIME, AND FIRE INFORMATION

Access to the Lausanne facility is completed by the use of a key card and unique PIN. Students are trained to close the doors behind themselves, and are not allowed to open the door for strangers (only staff may do this). Family and friends may only visit during visitation hours, and must sign the guestbook and be introduced to the Director or Assistant Director. Doors have prop alarms, and resident advisors perform a nightly "lock-up" at 10:00pm at which they walk the entire building, checking doors and windows to ensure they are closed and locked.

The perimeter of the building is mostly monitored by cameras. There is lighting on the exterior by all doors. All burned out lights or other maintenance needs are identified by resident advisors during their lock-ups, or by the maintenance staff, and replaced.

At the beginning of each semester, the program director provides an extended session in orientation on safety. All safety aspects of the building and access, with regard to going out into Lausanne (especially in the evenings), and related to students' travel on weekends are discussed. Responsible decision making regarding alcohol consumption, caring for someone who has over-consumed alcohol, protecting oneself and others against assault, responding to sexual assault, and responding in the case of a violent attack which occurs in close proximity is also discussed.

The following are policies or rules regarding the following items in the residence where students live:

1. There is one organized fire drill each semester.
2. Portable electrical appliances, such as a hot pot are not allowed.

3. Smoking is not allowed anywhere in Pepperdine's property in Lausanne
4. Open flames are not allowed anywhere in Pepperdine's property in Lausanne

Each semester, in the first days of the semester, students learn the protocol (which exits to use, which fire doors to leave closed, where to locate fire extinguishers, where the outside gathering point is, etc.) and within a day or two there is a fire drill where all students evacuate. A representative from the fire alarm vendor engages the alarms, exits are located, and staff inspects each siren. Faculty are trained at the start of the year to lead students out of the classroom and out of the building.

If a fire is small and is observed, the fire extinguishers should be used to put the fire out. The director, assistant director should be notified immediately and the Fire Department (if needed to evaluate the area) will be called. If the fire is large, the fire alarm button (one on each floor) should be pressed, which will automatically notify the Fire Department. When the alarm sounds all students should exit the building immediately. They should leave all belongings where they are, grab a coat (if they are in their room, and it is winter), and evacuate the building in an orderly manner. They should not open fire doors which separate the building into sectors. They should exit the building and gather at the intersection of Av. Marc-Dufour and Chemin de Villard. The following people holding the position title below, should be notified that a fire occurred in the student residence area after the incident:

1. Ezra Plank, director
2. Mark Barneche, associate director
3. Heather Mazzu, assistant director
4. Monika Zimmerli, coordinator of finance, visas, and student insurance
5. Lorianne Forest, coordinator of facility and meals

There are no current plans for future improvements in fire safety, as determined necessary by the institution.

#### CONTACT THE FOLLOWING INDIVIDUAL(S) IN CASE OF EMERGENCY

1. Ezra Plank, director, phone +4176422257
2. Mark Barneche, associate director, phone +41764182125

#### LOCAL POLICE

Rue St-Martin 33

1002 Lausanne, CH

Phone +41 21 315 15 15

<https://www.lausanne.ch/en/officiel/administration/securite-et-economie/police-de-lausanne.html>

#### LOCAL ALCOHOL AND MARIJUANA LAWS

All people may buy and consume beer and wine when they have reached 16 years old. At 18 years old, all people may purchase and consume any type of alcohol, including hard alcohol. The blood alcohol limit in Switzerland is .05, and it is illegal to sell alcohol after 10:00pm.

Cannabis products with tetrahydrocannabinol (THC) are banned under Swiss narcotics legislation, while cannabidiol (CBD) products are not (although products made from cannabis plants that contain very little THC - less than one per cent - can be bought and sold legally). Adults who consume cannabis illegally face a fixed penalty fine of CHF 100. There is no penalty for the possession of 10 grams or less of cannabis.

The Lausanne Program's policy on alcohol and marijuana is the same as Malibu: students are not allowed to possess, use, or sell illegal drugs or alcohol in the facilities or any sponsored event.

2023 Annual Clery Crime Statistics  
 Lausanne Campus  
 Av. Marc-Dufour 15  
 1007-Lausanne CH  
 Switzerland  
 Ph +41213210909  
 CAMPUS CLOSED AUGUST 2023

Offense	Year	On Campus	Student Housing	Non-Campus	Public Property	Total Crimes
Murder or Non-Negligent Manslaughter	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Manslaughter by Negligence	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Rape	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Fondling	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Incest	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Statutory Rape	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Robbery	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

Aggravated Assault	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

Burglary	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Motor Vehicle Theft	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Arson	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Hate (Bias) Crimes	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Domestic Violence	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Dating Violence	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Stalking	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

Weapons, Arrests	2023	0	0	0	0	0
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	2022	0	0	0	0	0
	2021	0	0	0	0	0
Drug Related, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Liquor Law, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Weapons, Disciplinary Referrals	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Drug Related, Disciplinary Referrals	2023	1	1	0	0	1
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Liquor Law, Disciplinary Referrals	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Unfounded Reports	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

2022 Annual Fire Log and Fire Safety Information

Lausanne Campus

Av. Marc-Dufour 15

1007-Lausanne CH

Switzerland

Ph +41213210909

CAMPUS CLOSED AUGUST 2023

**Statistics and Related Information Regarding Fires**

Year	Total Fires	Cause of Fire	Number of Injuries That Required Treatment at a Medical Facility	Total Fire-Related Deaths	Property Damage/Loss Caused by Fire*
2023	0	0	0	0	\$0
2022	0	0	0	0	\$0
2021	0	0	0	0	\$0

**Fire Safety Drills and Systems**

Residential Facility	Number of Drills	Fire Sprinkler System	Fire Extinguishers	Addressable Fire Alarm System	Smoke Detectors	Smoke Detectors Tied in Alarm and Central Monitoring System
La Croisée - Lausanne	3	No	Yes	Yes	Yes	Yes

**\*Value Ranges for Estimated Property Damage Due to Fire**

\$0 – \$99	\$50, 000 – \$99,999
\$100 – \$999	\$100,000 – \$249,999
\$1,000 – \$9,999	\$250,000 – \$499,999
\$10,000 – \$24,999	\$500,000 – \$999,999
\$25,000 – \$49,999	>\$1,000,000





## London Campus

56 Prince's Gate  
London SW7 2PG  
United Kingdom  
Ph +44 (0) 207 581 1506

U.S. Embassy  
33 Nine Elms Lane  
London, SW11 7US  
Ph +44 (0) 20 7499 9000  
<https://uk.usembassy.gov/>

U.S. Consulate  
Danesfort House  
223 Stranmillis Road  
Belfast BT9 5GR  
Phone: [44] (0)28-9038-6100

### SECURITY, CRIME, AND FIRE INFORMATION

Access to the London program is completed through the use of key cards. All students and employees must use a key-card and pin to access the program facility. Each key card is individually programmed and program staff can review entry and exit records to see who accessed the building, at which door, and the time of entry. Students may not share or borrow someone else's key card. Visitors must be escorted at all times and social visits are limited to 30 minutes. Any unauthorized guests found in the house could result in disciplinary action. All repair persons are escorted around the house after ringing the doorbell for entry. There are security cameras at each door for monitoring entrances and the resident advisors routinely check the doors and windows at night. All students responsible for looking for strangers in the house.

Maintenance problems are reported by the resident advisors and a maintenance person monitors electrical problems daily and is trained electrician.

Security practices and procedures are covered during new student orientation. An educational video reviews past security lapses and shows students how to help keep the house secure. The resident advisors are responsible for making sure students do not allow outsiders (including parents) into the house.

The following are policies or rules regarding the following items in the residence where students live:

1. There is one organized fire drill each semester.
2. Portable electrical appliances-irons used only in the laundry room. Hair dryers in the hall spa area only where no water is used.

3. Smoking is allowed on balconies or in the garden. None in house.
4. The presence of open flames-prohibited.
5. Faculty given fire safety handbook. Students are shown fire escapes during orientation.

Students appoint a fire monitor in each room. In the event of a fire, everyone will meet at a meeting point across the street from the London house. Employees also follow the same rules. Room fire monitors responsible for reporting all safe lists.

The following people holding the position title below, should be notified that a fire occurred in the student residence area after the incident:

1. Heather Pardee, Director (returns from leave, November 2023)
2. Jenny Ryan, Associate Director & Interim Director (until November 2023)

In 2024, all permanent staff participated in fire safety and fire extinguisher training. A number of improvements have been suggested by our fire safety provider (Firetechnics) which have been and will be implemented in 2024/2025 (i.e. double the number of fire drill, weekly fire alarm testing, improved fire emergency training for RAs and faculty-in-residence, improved PAT testing).

#### CONTACT THE FOLLOWING INDIVIDUAL(S) IN CASE OF EMERGENCY

1. Heather Pardee, Director, phone +44 (0) 7519 130 332
2. Cambry Pardee, Spiritual Life Director, phone +44 (0) 7519 130 328
3. Karen Haygreen, Assistant Director, phone +44 (0) 7889 719051
4. Faculty flat (Prince's Gate Flat), phone +44 (0) 203 848 7061
5. Faculty flat (Garden View flat), phone +44 (0) 203 848 7062
6. Visiting faculty & RAs (mobile numbers vary for each term)

#### LOCAL POLICE

Kensington Police Station

72-74 Earls Court Road

London W8 6EQ. Emergency

Phone: 999. Non-emergency phone: 101.

Calling from abroad: +44 20 7230 1212.

<https://www.met.police.uk/>

#### LOCAL MARIJUANA AND ALCOHOL LAWS

If you are under 18, it is against the law for someone to sell you alcohol, to buy or try to buy alcohol, for an adult to buy or try to buy alcohol for you, to drink alcohol in licensed premises (such as a pub or restaurant). However, if you are 16 or 17 and accompanied by an adult, you can drink (but not buy) beer, wine or cider with a meal.

In London, Transport for London (TfL) has a policy in place that bans passengers from drinking alcohol or carrying open containers of alcohol on public transport. You can drink and buy alcohol on national trains in the UK, however, operators can decide to run 'dry' trains where you cannot consume or carry

alcohol on board, for example trains going to football matches or other sporting events. Where this happens, notices are put up in advance to warn passengers. It is illegal to have disruptive public behavior while being under the influence of alcohol (a drunk and disorderly offense).

In the UK, you can get a fine or prison sentence if you take drugs, carry drugs, make drugs, or supply drugs. The maximum penalties for drug possession, supply (selling, dealing or sharing) and production depend on what type or 'class' the drug is. Cannabinoids fall in Class B. The penalty for possession is up to 5 years in prison, an unlimited fine or both. The penalty for supply and production is up to 14 years in prison, an unlimited fine or both. See <https://www.gov.uk/penalties-drug-possession-dealing>. Within the program's facilities and while traveling on any University sponsored excursion, the same policies regarding drugs and alcohol apply as in Malibu. This means alcohol and marijuana are not allowed, even if the items are legal to consume when he or she is off campus or traveling away from the group. Intoxication is also prohibited regardless of age.

2023 Annual Clery Crime Statistics  
London Campus  
56 Prince's Gate  
London SW7 2PG  
United Kingdom  
Ph +44 (0) 207 581 1506

Offense	Year	On Campus	Student Housing	Non-Campus	Public Property	Total Crimes
Murder or Non-Negligent Manslaughter	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Manslaughter by Negligence	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Rape	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Fondling	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Incest	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Statutory Rape	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Robbery	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

Aggravated Assault	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

Burglary	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Motor Vehicle Theft	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Arson	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Hate (Bias) Crimes	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Domestic Violence	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Dating Violence	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Stalking	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

Weapons, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0

	2021	0	0	0	0	0
Drug Related, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Liquor Law, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Weapons, Disciplinary Referrals	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Drug Related, Disciplinary Referrals	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Liquor Law, Disciplinary Referrals	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Unfounded Reports	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

2023 Annual Fire Log and Fire Safety Information  
London Campus  
56 Prince's Gate  
London SW7 2PG  
United Kingdom  
Ph +44 (0) 207 581 1506

**Statistics and Related Information Regarding Fires**

Year	Total Fires	Cause of Fire	Number of Injuries That Required Treatment at a Medical Facility	Total Fire-Related Deaths	Property Damage/Loss Caused by Fire*
2023	1	Unintentional - Hair dryer failure	0	0	\$0 – \$99
2022	0	0	0	0	\$0
2021	0	0	0	0	\$0

**Fire Safety Drills and Systems**

Residential Facility	Number of Drills	Fire Sprinkler System	Fire Extinguishers	Addressable Fire Alarm System	Smoke Detectors	Smoke Detectors Tied in Alarm and Central Monitoring System
London house	4	No	Yes	Yes	Yes	Yes

**\*Value Ranges for Estimated Property Damage Due to Fire**

\$0 – \$99	\$50, 000 – \$99,999
\$100 – \$999	\$100,000 – \$249,999
\$1,000 – \$9,999	\$250,000 – \$499,999
\$10,000 – \$24,999	\$500,000 – \$999,999
\$25,000 – \$49,999	>\$1,000,000



## Shanghai Campus

Lane 532 Yuyuan Road No. 66, Shanghai  
China 200042  
Ph +86(21) 5238-6870

U.S. Embassy  
55 Anjialou Rd, Chaoyang District  
Beijing, China, 100600  
Phone: 010-8531-3000  
<https://china.usembassy-china.org.cn>

U.S. Consulate  
1469 Huai Hai Zhong Road  
(Near Wulumuqi Nan Lu)  
Shanghai, China, 200031  
Phone: 86-21 8011-2200  
<https://china.usembassy-china.org.cn/embassy-consulates/shanghai/contact-us/>

### CAMPUS CLOSURE

**The Shanghai Campus was closed on July 31, 2021.**

### SECURITY, CRIME, AND FIRE INFORMATION

The Shanghai facilities have one gate and a guard 24 hours a day, seven days a week. The gate is open during the daytime, but the guard still ensures that non-students do not enter unless otherwise cleared. At nighttime (after 2:00am), the gate is closed and can only be opened by the guard, after which students must sign in. Staff offices are accessible only with a key card. There are two full-time staff who maintain the facilities. They are supervised by the program director and the program coordinator. Most maintenance issues are identified and resolved quickly. If issues are identified first by students, they typically tell a program staff, who make sure it is resolved in a timely manner. If there is an emergency maintenance issue when the maintenance staff are not on duty, the resident advisors, the 24/7 guard and/or one of the students will contact the program director. Students are coached on personal safety in a number of ways, especially during orientation in which they go over a number of policies, best practices and scenarios. There is also language on personal safety in the program handbook.

The following are policies or rules regarding the following items in the residence where students live:

1. There are three organized fire drills each year.
2. Portable electrical appliances are not allowed.
3. Smoking is not allowed.
4. The presence of open flames is not allowed.



The program handbook describes the fire safety education and training programs provided to students and employees. Additional information is contained in the orientation handbook that students receive when they arrive, and this is discussed during the orientation. Students are quizzed on orientation content at the end of the week to make sure the information is retained.

**In Case of Fire or Other Non-Program Closing Emergency:**

1. General Emergency Contact Protocol will be used to disseminate information.
2. If students detect a fire, there will be blow horns placed at the entryway of each building for students to alert others.
3. Each building has a ladder in case exit paths are blocked for students on the second or third floors.
4. The initial gathering point is outside of the gate of the Pepperdine facilities. If that location is deemed dangerous, students should proceed to the alley entrance on Yuyuan Rd (lane 532 entrance).
5. The normal guards will be on duty 24 hours a day, and will be given updated information sheets to distribute to students with emergency contact information and relevant details.
6. If necessary, classes will relocate to Fudan University's campus.
7. Students will be housed in a combination of dorm rooms on Fudan's campus, pending space availability, and/or the Fudan University Crowne Plaza hotel.
8. The temporary gathering point is Element Fresh, 2nd Floor Shanghai Center/Portman 1376 Nanjing Xi Rd. (Near Tongren Rd.

The following people holding the position title below, should be notified that a fire occurred in the student residence area after the incident:

1. Charlie Engelmann, program director
2. Gigi Zhang, program coordinator
3. William Wu, associate director

There are no current plans for future improvements in fire safety, as determined necessary by the institution.

**CONTACT THE FOLLOWING INDIVIDUAL(S) IN CASE OF EMERGENCY**

Charlie Engelmann, cell: +86 13681922774

**LOCAL POLICE**

Jing'an Police Department

China, Shanghai, Jing'an, Wanhangu Rd, 万航渡路55弄5

Phone number is 110

No website

**LOCAL MARIJUANA AND ALCOHOL LAWS**

Any drug use or associated activity is highly illegal in China. There is not a legal drinking age in the city. The bars of the city have hours that are quite irregular.

Within the program's facilities and while traveling on any University sponsored excursion, the same policies regarding drugs and alcohol apply as in Malibu. This means that alcohol and marijuana are not allowed, even if the items are legal to consume when he or she is off campus or traveling away from the group. Intoxication is also prohibited regardless of age.

2023 Annual Clery Crime Statistics  
Shanghai Campus  
Lane 532 Yuyuan Road No. 66, Shanghai  
China 200042  
Ph +86(21) 5238-6870  
CAMPUS CLOSED AS OF JULY 31, 2021

Offense	Year	On Campus	Student Housing	Non-Campus	Public Property	Total Crimes
Murder or Non-Negligent Manslaughter	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Manslaughter by Negligence	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Rape	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Fondling	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Incest	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Statutory Rape	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Robbery	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0

Aggravated Assault	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0

Burglary	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Motor Vehicle Theft	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Arson	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Hate (Bias) Crimes	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Domestic Violence	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Dating Violence	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Stalking	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0

Weapons, Arrests	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a

	2021	0	0	0	0	0
Drug Related, Arrests	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Liquor Law, Arrests	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Weapons, Disciplinary Referrals	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Drug Related, Disciplinary Referrals	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Liquor Law, Disciplinary Referrals	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0
Unfounded Reports	2023	n/a	n/a	n/a	n/a	n/a
	2022	n/a	n/a	n/a	n/a	n/a
	2021	0	0	0	0	0

2023 Annual Fire Log and Fire Safety Information  
Shanghai Campus  
Lane 532 Yuyuan Road No. 66, Shanghai  
China 200042  
Ph +86(21) 5238-6870  
CAMPUS CLOSED AS OF JULY 31, 2021

**Statistics and Related Information Regarding Fires**

Year	Total Fires	Cause of Fire	Number of Injuries That Required Treatment at a Medical Facility	Total Fire-Related Deaths	Property Damage/Loss Caused by Fire*
2023	n/a	n/a	n/a	n/a	n/a
2022	n/a	n/a	n/a	n/a	n/a
2021	0	0	0	0	\$0

**Fire Safety Drills and Systems**

Residential Facility	Number of Drills per Year	Fire Sprinkler System	Fire Extinguishers	Addressable Fire Alarm System	Smoke Detectors	Smoke Detectors Tied in Alarm and Central Monitoring System
Building 1	3	No	Yes	No	**Yes	No
Building 2	3	No	Yes	No	**Yes	No
Building 3	3	No	Yes	No	**Yes	No
Garden Room	3	No	Yes	No	No	No

\*\*Not in all areas/rooms, but present in the building

**\*Value Ranges for Estimated Property Damage Due to Fire**

\$0 – \$99	\$50, 000 – \$99,999
\$100 – \$999	\$100,000 – \$249,999
\$1,000 – \$9,999	\$250,000 – \$499,999
\$10,000 – \$24,999	\$500,000 – \$999,999
\$25,000 – \$49,999	>\$1,000,000



## Washington, DC Campus

2011 I St NW, Floor 4  
Washington, DC 20006  
United States  
Ph 202-776-5320

### SECURITY, CRIME, AND FIRE INFORMATION

All facilities (including elevators) used by students are accessible only by Pepperdine-issued key cards. Student residences require both key cards and a pin code. The front door to the building is open during business hours 8am- 6pm, but requires a key card during evening/night time. The building has 24-hour security officers on duty who conduct walkthroughs regularly and monitors via closed-circuit camera system.

There is a full-time building management and security company readily available to attend to any security or maintenance issues. Program and building maintenance staff conducts (at minimum) weekly walkthroughs of the facility to check for any issues or safety hazards. All students and staff know to immediately report any concerns or maintenance issues to the Program Coordinator, who works with the building manager to have issues fixed as quickly as possible. The Program Coordinator lives on campus and can be easily reached in case of emergency.

Written security information is provided to students and staff in handbooks, and all emergency and security protocols are reviewed during orientation at the beginning of each term. A tour of the facility and the surrounding neighborhood is given including safety information and security protocol. A detailed presentation regarding rules and procedures is presented. Students understand that violating security protocol can lead to disciplinary action— this can include not signing in guests at the security desk, having unapproved overnight guests, or not filling out the travel log that is required to confirm student locations during weekends. Additionally, building security officers speak to students at the beginning of the term about their roles and what students and staff can do to help ensure the safety of the facility.

An organized fire drill takes place each semester. Smoking and open flame is strictly prohibited. Students are not allowed to have hot plates or toasters in their residence but all rooms are equipped with microwaves. Students are allowed to have low-watt devices such as coffee makers.

Students are provided written fire safety information in their handbooks, and all emergency and fire safety protocols are reviewed during orientation at the beginning of each term. Students receive a tour of the facility that includes fire safety protocol, and a detailed presentation regarding rules and procedures. Additionally, there is fire safety info posted in the rooms and hallways of the residence.

Evacuation Guidance: If a student discovers a fire or smell and/or sees smoke, get out of the area, report the incident to Police at 911. Pull the local fire alarm, which is located in the building. If there is smoke, stay low to the floor and move to a safe area. Smoke will rise towards the ceiling.

Students are instructed to feel closed doors for heat before opening them using the back of one's hand as it is more sensitive to heat than the palm. If the door is hot, the fire may be on the other side of the closed door; if another escape route exists, take it. If not, open the door carefully to see if escape is possible. If escape is not possible, put signs in the windows and, if available, use phones to alert first responders for rescue. If safe to do so, evacuate the building.

Meeting Location: In emergencies students and staff are asked to gather in James Monroe Park across the street from the Pepperdine D.C. Campus (2011 Pennsylvania Ave, NW, Washington, D.C. 20006)

Communication: All students will receive text messages with any emergency information. If a student does not respond or arrive at the meeting location, the program staff will contact their place of work, emergency contact or other designated contact. If the student cannot be located then they may be treated as a missing person.

Retrieving Items: No student or staff can enter the building until cleared to do so by emergency or fire personnel. Any retrieval of items will be done following guidelines of emergency personnel.

Relocation: If relocation is necessary then students will be directed to go to a designated hotel in the area (see later section on short-term accommodation). If longer-term living accommodation and classroom space is needed then this will be arranged through a local real estate vendor called Suite Solutions (Pepperdine has worked with them on numerous occasions in the past).

The following people holding the position title below, should be notified that a fire occurred in the student residence area after the incident:

1. Brian Swarts, Program Director, 202-549-1153
2. Callie Colvin, Program Manager, 817-875-5176

The fire system is code compliant and is tested annually as required by code. Smoke/carbon monoxide detectors were added to the property.

#### CONTACT THE FOLLOWING INDIVIDUALS IN CASE OF EMERGENCY

1. Brian Swarts, Program Director, phone 202-549-1153
2. Callie Colvin, Program Manager, phone 817-875-5176

LOCAL POLICE



2119 G St NW  
Washington, D.C. 20037  
(202) 727-9099 or 911  
<https://mpdc.dc.gov/>

#### LOCAL MARIJUANA AND ALCOHOL LAWS

Under the legalization measure that went into effect in 2015, persons over the age of 21 in D.C. may possess up to two ounces of marijuana, grow up to three mature and three immature marijuana plants in their homes, and transfer up to one ounce of marijuana to another individual. Drug paraphernalia, such as bongs, are also legal. The sale, purchase, and public consumption of marijuana remains illegal.

Individuals must be at least 21 years of age to purchase or consume alcohol. It is illegal to serve or sell alcohol to anyone under the age of 21. There are no family or location exceptions to its underage drinking laws. In D.C., packaged alcoholic beverages may be sold between 7:00 a.m. and midnight, any day of the week. Alcoholic beverages may be served in bars and restaurants between 8:00 a.m. and 2:00 a.m., Sunday through Thursday, and between 8:00 a.m. and 3:00 a.m., Friday and Saturday.

Within the D.C. facilities, and while traveling on any University sponsored excursion, the same policies regarding drugs and alcohol apply as at the Malibu Campus. This means alcohol and marijuana are not allowed, even if the items are legal to consume off campus or traveling away from the group. Intoxication is also prohibited regardless of age.

2023 Annual Clery Crime and Fire Statistics  
Washington DC Campus  
2011 I St NW, Floor 4  
Washington, DC 20006  
United States  
Ph 202-776-5320

Offense	Year	On Campus	Student Housing	Non-Campus	Public Property	Total Crimes
Murder or Non-Negligent Manslaughter	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Manslaughter by Negligence	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Rape	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Fondling	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Incest	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Statutory Rape	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Robbery	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

Aggravated Assault	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

Burglary	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Motor Vehicle Theft	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Arson	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Hate (Bias) Crimes	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Domestic Violence	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Dating Violence	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Stalking	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

Weapons, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Drug Related, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Liquor Law, Arrests	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Weapons, Disciplinary Referrals	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Drug Related, Disciplinary Referrals	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Liquor Law, Disciplinary Referrals	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0
Unfounded Reports	2023	0	0	0	0	0
	2022	0	0	0	0	0
	2021	0	0	0	0	0

2023 Annual Fire Log and Fire Safety Information  
Washington DC Campus  
2011 I St NW, Floor 4  
Washington, DC 20006  
United States  
Ph 202-776-5320

**Statistics and Related Information Regarding Fires**

Year	Total Fires	Cause of Fire	Number of Injuries That Required Treatment at a Medical Facility	Total Fire-Related Deaths	Property Damage/Loss Caused by Fire*
2023	0	0	0	0	\$0
2022	0	0	0	0	\$0
2021	0	0	0	0	\$0

**Fire Safety Drills and Systems**

Residential Facility	Number of Drills	Fire Sprinkler System	Fire Extinguishers	Addressable Fire Alarm System	Smoke Detectors	Smoke Detectors Tied in Alarm and Central Monitoring System
Washington DC Program	3	Yes	Yes	Yes	Yes	No

**\*Value Ranges for Estimated Property Damage Due to Fire**

\$0 – \$99	\$50, 000 – \$99,999
\$100 – \$999	\$100,000 – \$249,999
\$1,000 – \$9,999	\$250,000 – \$499,999
\$10,000 – \$24,999	\$500,000 – \$999,999
\$25,000 – \$49,999	>\$1,000,000

## UNIVERSITY-WIDE ALCOHOL AND DRUG POSSESSION/EDUCATION AND POLICIES

Student Policies - Pepperdine University seeks to foster an alcohol- and drug-free environment in which to work, live, learn, and grow. As a Christian University, we approach alcohol and other drug abuse with a combination of compassion, encouragement, directness, and concerned firmness. An aspect of this caring approach is the consistent enforcement of the regulations regarding alcohol and other drugs contained within this policy. The purpose of this policy is to ensure a safe environment that is consistent with the mission of the University and its goal to foster an alcohol- and drug-free environment. The following information is presented in compliance with the Drug-Free Schools and Communities Act of 1989.

### Good Samaritan Policy

Pepperdine's primary concern is the health and safety of our students. Students are encouraged to do the right thing and "Step Up" whenever they see someone in need of medical assistance. Our Good Samaritan policy is intended to remove potential barriers to seeking assistance, such as concerns regarding disciplinary action by the University.

### Policy

Students who seek medical assistance for themselves or others will not receive disciplinary sanctions for violations of the Student Code of Conduct that occurred at or near the time of the incident. Instead, the students involved may be assigned alcohol or other drug education and assessment programs, to be determined on a case by case basis with the intention of providing support and preventing future occurrences.

This policy is applicable to:

- the student(s) requesting medical assistance for another person
- the student requesting medical assistance for oneself
- the student(s) for whom medical assistance was provided

To qualify for this policy, students requesting medical assistance must "Call. Stay. Cooperate."

- Call: if you are on campus, contact a University official (e.g., resident advisor, The Department of Public Safety); if you are off campus, call 911 or contact any appropriate official (e.g., event staff manager, police officer); and
- Stay: stay and monitor the student's condition until medical assistance arrives; and
- Cooperate: cooperate and be honest throughout the incident and any follow-up investigation.

The following are not covered by the Good Samaritan policy:

- This policy does not cover the following violations: dishonesty, hazing, causing or threatening physical harm, theft, property damage, possession with the intent to distribute drugs.
- This policy does not apply to a student who is charged with sexual misconduct (e.g., a student accused of sexual assault cannot be covered by the Good Samaritan policy).
- This policy does not apply if a University or other official responds to the student needing assistance before a student calls for assistance.

#### Application to Sexual Misconduct

This policy applies to students who report sexual misconduct (including sexual harassment, sexual assault, domestic violence, dating violence, and stalking) or participate as a witness in sexual misconduct investigations, or who seek assistance for themselves or another by contacting an appropriate official (e.g., Title IX Coordinator for Students, resident advisor, the Department of Public Safety officers, or calling 911). In these cases, the University will not pursue disciplinary action for a violation by the student of the Student Code of Conduct occurring at or near the time of the incident.

#### Application to Student Organizations

In circumstances where a student organization is found responsible for hosting an event where medical assistance is sought by anyone in attendance for a member or guest, this Good Samaritan action will be viewed as a mitigating factor in determining the appropriate sanction for the student organization. Conversely, failure to call will be considered an aggravating factor in any disciplinary action against the organization. Members of an organization hosting an event are expected to promptly call for assistance if they become aware of an emergency.

#### Application to Hosts of Parties

Students found responsible for hosting a party (or in any way assisting or promoting a gathering that includes drunkenness or drug use or underage drinking) on or off campus normally results in suspension. However, if any of the hosts act as a Good Samaritan, then no disciplinary action will be taken against the hosts. If medical assistance is sought by someone else in attendance, this Good Samaritan action by the attendee will be viewed as a mitigating factor in determining the appropriate sanction for the hosts. Conversely, failure to call will be considered an aggravating factor if the hosts become aware of an emergency and do not promptly call for assistance.

#### Actions by the Office of Community Standards

- The Good Samaritan policy is applied after an incident has been reviewed by the Office of Community Standards. University officials (e.g., DPS, resident advisors) responding to an incident on campus will follow all normal protocols on the scene, including documentation of the incident.
- The assistant dean of students for community standards (or designee) will determine if the Good Samaritan policy applies to an incident. If it is not applied and the student is charged with a violation, the student may request a hearing with the Student Disciplinary Committee (SDC) to review whether the Good Samaritan policy should apply. If the SDC determines it does not apply, the student may appeal the decision to the University's dean of students through the normal appeal process.
- The Office of Community Standards will waive the normal fee for alcohol and other drug educational assignments whenever the Good Samaritan policy applies.
- Failure to complete the educational assignments or treatment recommendations may result in disciplinary action.

#### Frequently Asked Questions About the Good Samaritan Policy

Please see the full Good Samaritan Policy Page for the FAQ and Illustrative Examples

Last Updated: September 5, 2023  
Policy Contact: Community Standards

#### Prevention and Education

Pepperdine seeks to prevent alcohol and other drug-related problems by educating students about the personal and social consequences associated with the abuse of alcohol and drugs. Educational programs are offered on an ongoing basis and are coordinated through the Counseling Center. Resident advisors in the residence halls receive alcohol and drug awareness training in order to serve the needs of the residential community. Prevention strategies also include efforts to change inappropriate community norms regarding alcohol and other drug use and to alter environmental factors that support inappropriate use. Finally, the University partners with the community and parents/guardians of students to help prevent abuse.

#### Assistance in Overcoming Alcohol and Other Drug Abuse

For students who seek help for substance abuse problems, complete confidentiality will be observed to the limit of the law. Insofar as federal and state laws and professional ethical standards permit, no staff member at the Pepperdine health and counseling centers will in any way notify the administration of the name of a student who seeks help for a substance abuse problem without prior written permission from that student, and no records will be forwarded to the administration regarding the services or the problem. Confidential counseling and treatment are available to students through the Student Health and Counseling Centers or by referral to appropriate agencies off-campus. Please contact the Counseling Center at 310-506-4210 for more information.

#### Regulations and Sanctions Regarding Alcohol and Other Drugs

Students are responsible for adhering to Federal, State, and local law, and to the University's policy on alcohol and other drugs. When violations of law or policy come to the attention of University officials, students may be referred for criminal prosecution and University sanctions may be imposed. Harm to persons or damage to either private or University property arising from the actions of intoxicated individuals on the premises of the University will be the full and sole responsibility of such individuals.

The consumption or possession of alcoholic beverages or possession of empty containers is prohibited on University property or at any off-campus undergraduate University-sponsored event or activity, regardless of the student's age.

Absent the exceptions explicitly outlined below, it is a violation for any student to be in the presence of alcohol, alcohol containers, controlled substances, or drug-related paraphernalia on any University campus. The only exceptions to this policy are students may be in the presence of alcohol (i) at special events at the Chateau d' Hauteville in Blonay-St. Legier, Switzerland that are approved in advance by the vice chancellor of that campus, or (ii) at special events held at private residences on the Malibu campus that are approved in writing in advance by the president, provost, chancellor, or executive vice president. Undergraduate students, regardless of their age, are not allowed to consume alcohol at these special events.



Off campus, it is a violation to drink underage. It is also a violation to misrepresent one's age for the purposes of purchasing or consuming alcohol. This includes the manufacture, sale, distribution, promotion, possession, or attempt to obtain false identification (on or off campus). Possessing a fake ID may result in University probation on the first offense.

Intoxication, on or off campus, may result, minimally, in University probation on the first offense and suspension on the second offense. Intoxication is defined as a blood alcohol content of .08% or more. Intoxication may also be determined by conduct (e.g., aggressive, disruptive, destructive, hazardous, vulgar), speech (e.g., incoherent, rambling, slurring) and/or coordination (e.g., difficulty maintaining balance, staggering) during or following the consumption of alcoholic beverages.

The refusal by a student to take or fully cooperate with a breathalyzer, field sobriety, or drug test may be considered as an admission of being under the influence.

Operating a motor vehicle, on or off campus, while under the influence of alcohol or a controlled substance is a serious threat to oneself and the community and may result in immediate suspension, expulsion, or dismissal. Anyone who injures another person as a result of driving under the influence may be permanently dismissed.

The attempt to obtain, use, possess, distribute, or sell, any potentially harmful or illegal drug (e.g., prescription drugs, marijuana, cocaine) or drug-related paraphernalia (including hookahs) is strictly prohibited. Anyone involved in the sale or distribution of drugs on or off campus may be dismissed immediately.

The possession or presence of any amount of a controlled substance, as defined by federal law (which includes marijuana and cannabis related products, including CBD), is prohibited on or off campus. This includes but is not limited to the presence of marijuana smoke or odor, small "roaches," or residue found in baggies, pipes, or other paraphernalia. The possession or use of medicinal or recreational marijuana in any form is prohibited on or off campus. The possession or presence of marijuana, cannabis, or other controlled substances may result, minimally, in suspension.

Possession or use of any herb or drug used for hallucination or intoxication.

Promoting the consumption of drugs or alcoholic beverages by students may not be undertaken on any University property or through University-sponsored publications or events.

Any undergraduate student (regardless of age) or undergraduate student organization found possessing, consuming, or supplying alcohol or other drugs at University-sponsored off-campus events will be subject to disciplinary action.

Any student leader (including, but not limited to, Orientation Leaders, RAs, and Student Service Officers) who promotes or supplies alcohol or other controlled substances may be immediately

suspended, expelled, or dismissed from the University. Examples of promoting alcohol/controlled substances include advertising parties either verbally or with flyers and inviting or driving underage students to parties where alcohol is present.

Hosting or in any way assisting or promoting a gathering (on or off campus) that includes drunkenness or drug use or underage drinking, whether intended or not, may result in suspension or dismissal. Those living at the location where the party is held may be held responsible as hosts regardless of who provides the alcohol.

Any student who encourages another to consume alcoholic beverages or any substance as a means to induce that individual to engage in behavior that would otherwise be against that person's will is subject to dismissal.

Any student who sexually assaults or attempts to sexually assault another person who is incapacitated due to alcohol or other drugs is subject to immediate permanent dismissal.

#### Health Risks

The use and abuse of alcohol and other drugs can cause a number of problematic changes in behavior and physiology. Alcohol, especially in high doses or combined with medications or other drugs, can lead to violent behaviors including acquaintance rape, vandalism, fights, incidents of drinking and driving, injury, and other medical emergencies. If you discover someone who is excessively intoxicated, unconscious or in need of emergency assistance, please dial 310-506-4441 on-campus, or 911 off-campus. Doing so may save someone's life.

Moderate to high doses of alcohol may cause marked impairments in higher mental functions, severely altering a person's ability to learn and recall information. Research has shown that using alcohol or other drugs negatively affects academic performance.

The risk of having an automobile accident increases after consuming even relatively small quantities of alcohol. Low doses may significantly impair judgment, coordination, abstract mental functioning, and the ability to complete complex tasks.

Repeated use of alcohol and other drugs can lead to physical and/or emotional dependence. Alcohol or substance dependence occurs when a person continues their use despite recurrent social, interpersonal, and/or legal consequences. There is strong evidence based on medical research that alcohol and other drug abuse contributes significantly to heart disease and cancer as well as permanent damage of vital organs such as the brain and liver. There is clear evidence of serious negative effects on babies due to the use of illicit drugs and alcohol by the mother during pregnancy.

The use of Cannabis (Marijuana, Hashish) may impair or reduce short-term memory and comprehension, alter sense of time, and reduce coordination and energy level. Its effect can last more than 4-6 hours after being used. Contrary to popular belief, marijuana is both physically and emotionally addictive.

Hallucinogens (LSD, Ecstasy, and PCP) cause hallucinations. The user may experience panic, confusion, suspicion, anxiety, and loss of control. Delayed effects can occur, including ongoing loss of concentration and memory. Frequent use can cause permanent loss of some mental functions.

Cocaine and Crack are highly addictive drugs. The immediate effects of cocaine include dilated pupils, elevated blood pressure, heart rate, respiratory rate, and body temperature, followed by depression. Crack can cause delirium, hallucinations, blurred vision, severe chest pain, muscle spasms, and even death. These drugs cause a temporary feeling of power, impairing judgment and decision-making.

Amphetamines (Crystal, Speed, Crank, and Meth) are highly addictive stimulants, which can cause one to "rush" around and appear stimulated. Amphetamines can cause rapid or irregular heartbeat, loss of coordination, collapse, and even death. Continued stimulant abuse can lead to mood swings, irritability, depression, sleeplessness, and even altered personality and paranoia.

Heroin causes the body to have diminished pain reactions and is highly addictive both physically and emotionally. It can cause disinterest in relationships, personal productivity, and workplace safety. The use of heroin can result in coma and death. Commonly used intravenously, heroin use is associated with a wide range of physical health problems (i.e., AIDS, hepatitis).

Prescription drugs (i.e. antidepressants, pain suppressants, stimulants, and tranquilizers) are safe only if taken as prescribed under the supervision of a licensed physician. If abused, they can lead to sluggishness or hyperactivity, impaired reflexes, liver and kidney damage, addiction, nervous system damage, or death.

#### Parental Notification

Pepperdine University has long recognized its special relationship with the parents and families of its students. Even after students leave home for college, parents often play a central role in their character development, so Pepperdine works in partnership with parents in helping students make the transition to responsible adulthood.

The University also recognizes that students have specific privacy rights. FERPA, the Family Educational Rights and Privacy Act of 1974, is a Federal law that controls the confidentiality of, and access to, student education records. The Higher Education Amendments of 1998 permit educational institutions to notify parents if a student, under the age of 21 at the time of notification, commits a disciplinary violation involving alcohol or a controlled substance. See Pepperdine's Student Records Policy for additional information about FERPA and educational records. A full copy may be obtained by contacting the Registrar's Office.

The purpose of Pepperdine's parental notification policy is to promote the holistic development of students and to foster an alcohol- and drug-free campus community. Among several interventions that may be used to further this purpose, parents or guardians of students under the age of 21 may be notified in the case of a violation of University alcohol or other drug policies. Notification begins with:

1. The first time a student is charged with violating the University policy under one of the following circumstances:
  - a. Caused serious harm to oneself or another while under the influence of alcohol or other drugs or was transported to a medical facility and treated because of alcohol or other drug use.
  - b. Caused significant damage or disruption while under the influence of alcohol or other drugs.
  - c. Operated a vehicle under the influence of alcohol or other drugs.
  - d. Was arrested or taken into custody by law enforcement officers while under the influence of alcohol or other drugs or is charged with violating a federal, state, or local law related to alcohol or other drug use.
  - e. Because of previous violations (not related to alcohol or other drugs), the current alcohol or other drug violation might result in the student being placed on suspension or a more severe sanction.
  - f. Hosted or in any way assisted or promoted a gathering that included underage drinking or drunkenness.
2. The first time a student is charged with violating the University policy regarding the attempt to obtain or the use, possession, sale, or distribution of any narcotic or other controlled substance.
3. The second time a student is charged with violating the University policy regarding:
  - a. The consumption, possession, sale, or distribution of alcoholic beverages.
  - b. Being in the presence of alcohol, alcohol containers, controlled substances, or drug-related paraphernalia on University property.

Normally, a parent or guardian will be notified in writing by the assistant dean of students for community standards before the disciplinary hearing. Before notifying the parents or guardians, every effort will be made to inform the student and attempt to have the student make the first contact. This is consistent with the general philosophy that supports students developing independence and personal accountability. However, in some situations, consultation with the student or first contact by the student may not be possible or appropriate, and in such cases, the University is not required to alert the student when it has notified his/her parent or legal guardian. In other situations, after consulting with the student, the assistant dean may determine that notifying the parents/guardians may be harmful to the student and in such cases the University is not obligated to make notification.

This policy does not preclude the University's contacting parents or guardians for other policy violations that may endanger the health and well being of a student or other individuals in the community. Also, the University may release information related to student educational records to parents who claim the student as a dependent for tax purposes.

Last Updated: September 30, 2021

Review of University Program and Policy

Biennially, the University will review its alcohol and other drugs prevention program and this policy to determine the program's and policy's effectiveness, to implement changes if needed, and to ensure that the University's disciplinary sanctions are consistently enforced.

Last Updated: September 5, 2023

Policy Contact: Community Standards

Employee Policies - Pepperdine University seeks to foster an alcohol and drug-free environment in which to work, live, learn and grow. The University's policies regarding the possession, use and sale of alcoholic beverages or illegal drugs, enforcement of federal and state laws and drug and alcohol abuse education programs can be found in the employee policy manuals and student handbooks.

In keeping with the mission of the University and its commitment to provide an alcohol and drug-free work environment, the University has formulated the following policy regarding alcohol and drugs.

The University prohibits the illegal use, possession, transport, manufacture, distribution, promotion or sale of drugs, drug paraphernalia or look-alike (simulated) drugs and the unauthorized use or possession of alcohol while performing work for the University.

University employees and independent contractors must not report to work or be on University controlled property while under the influence of any drug, alcohol or other substance which will in any way affect their work performance, alertness, coordination or response, or affect the safety of others on the job, or which would affect their ability to appropriately represent the University.

At no time or place shall an employee use or be under the influence of drugs or alcohol or any mind altering substance while driving, riding or sitting in a University vehicle.

Any employee who is required to use a medically prescribed or over-the-counter drug which may impair or affect the employee's alertness, coordination or responses must advise their supervisor of this fact before reporting to work. It is the employee's responsibility to determine whether or not a prescribed or over the counter drug may impair their job performance.

The University reserves the right to require any employee using prescribed or over-the-counter drugs to provide a physician's certification that the use of the drug will not impair the ability of the employee to perform their job properly and safely.

Pepperdine offers the Engage wellness program as an additional benefit and educational opportunity to faculty and staff. The Engage wellness program believes wellness is a multidimensional concept that includes providing health education to promote the six dimensions of health. These are defined as a balance of physical, social, spiritual, psychological, occupational, and intellectual health.

Approved by UMC: 9/20/2018

## I. Introduction

Pepperdine University (“University”) affirms that all members of our community are created in the image of God and therefore should be treated with dignity and respect. Our University Code of Ethics states that we do not unlawfully discriminate on the basis of any status or condition protected by applicable federal or state law. Further, we respect the inherent worth of each member of the community and do not engage in any form of harassment. We follow the profound truth found in the Golden Rule, “In everything do to others as you would have them do to you.” (Matthew 7:12).

In accordance with this belief, the University prohibits all forms of Sexual Harassment and Sexual Violence (collectively “Sexual Misconduct”) as defined by this Sexual Misconduct Policy (“Policy”). Sexual Harassment is defined differently under federal and state law. The applicable definitions and procedures under these laws also depend on your status in the University community as a student, faculty, staff, volunteer, or third party. Non-sexual harassment based on other protected categories is also treated differently under the law and is processed under other policies. Please do not let the legal complexities deter you from bringing a concern to the attention of our [University Title IX Coordinator](#). Indeed, the University encourages individuals to immediately bring any concerning behavior to the University’s attention even if such behavior does not constitute [Sexual Misconduct](#) or [Retaliation](#). Additionally, if you are the subject of a complaint of discrimination, harassment, or retaliation, please do not let the legal complexities deter you from asking questions about the applicable definitions and procedures that will apply to you. The University Title IX Coordinator can explain which definitions and policies will apply.

Speech that constitutes a protected exercise of a student’s rights under California’s Leonard Law will not be deemed a violation of this Policy. Some speech that may be protected by the Leonard Law is nonetheless inconsistent with the Golden Rule, and students are encouraged to live by this higher standard rooted in our Christian faith and heritage. Speech that

constitutes a protected exercise of a student's rights under California's Leonard Law will not be deemed a violation of this Policy. Some speech that may be protected by the Leonard Law is nonetheless inconsistent with the Golden Rule, and students are encouraged to live by this higher standard rooted in our Christian faith and heritage.

## **II. Statement of Non-Discrimination**

The University does not discriminate on the basis of sex in its educational programs and activities, including employment and admission. Complaints of discrimination based on sex (which includes Sexual Harassment) are handled under this Policy or other appropriate University grievance procedures as described below under [Jurisdiction of the Policy](#).

## **III. Rationale for Policy**

Because of our commitment to honoring the dignity and respect of every individual, [Sexual Misconduct](#) (and any related [Retaliation](#)) is prohibited and will result in disciplinary action, up to and including dismissal from the University. The University uses the formal grievance process to determine whether or not the Policy was violated. If a violation is found to occur, Pepperdine will implement remedies designed to restore or preserve equal access to the University's education program or activity to the Complainant, and will impose disciplinary sanctions on the Respondent.

## **IV. Jurisdiction of the Policy**

The U.S. Department of Education's Office for Civil Rights (OCR) enforces, among other laws, Title IX of the Education Amendments of 1972 (Title IX). Title IX protects people from discrimination based on sex in education programs or activities that receive Federal financial

assistance. Title IX states that: “No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.”

Because the University receives federal funds, the University is required to abide by Title IX and all applicable regulations implementing Title IX, including those published in May 2020. The Title IX regulations published in 2020 clarify the definition of “sexual harassment” prohibited under Title IX and require specific procedures to be followed when addressing such conduct. Conduct prohibited by Title IX under the 2020 Title IX regulations includes Sexual Harassment (creation of a hostile environment that has a specific definition under Title IX), Sexual Harassment (engaging in Quid Pro Quo), Sexual Assault, Dating Violence, Domestic Violence, and Stalking (all terms [defined](#) in Appendix A).

The 2020 Title IX regulations require procedures that have very specific steps. The type of conduct and the location of the conduct will determine whether these specific steps apply.

### **A. Procedures Required By the 2020 Title IX Regulations**

The 2020 Title IX Regulations prohibit specific types of conduct, defined as harassment on the basis of sex. The procedures mandated by the 2020 Title IX Regulations apply when the conduct prohibited by Title IX occurs in certain locations in the United States:

- In the education programs and activities of the University,
- On the campus or on property owned or controlled by the University,
- At University-sponsored events, or

- In buildings owned or controlled by the University’s recognized student organizations.

If the alleged conduct is prohibited by Title IX and occurs in one of these locations, the specific procedures required by Title IX will apply, as set forth in this Policy. This includes the requirement under the Title IX regulations for the University to dismiss a Title IX matter that does not meet the regulation’s definition of “sexual harassment,” did not occur in the University’s education programs or activities, and/or where the individual was located outside the United States when the conduct allegedly occurred, and/or where a Complainant is not



participating in or attempting to participate in a University education program or activity. If a matter is dismissed as a Title IX matter, the University will evaluate the application of this Policy as required by state law.

Regardless of whether allegations of Sexual Misconduct fall under the jurisdiction of Title IX or this broader Policy, the University is committed to a fair, accurate, consistent, transparent, and prompt response to any allegation of Sexual Misconduct.

## **B. Procedures When the Conduct is Not Covered by the 2020 Title IX Regulations**

It is important to note that pursuant to state law or this Policy, the University may still take action on allegations that fall outside the jurisdiction of Title IX, but violate this broader Policy. Such action may include using the [informal resolution process](#) and/or [formal grievance process](#) described below or using any other University policy the University deems applicable (e.g., [Employee Grievance Procedure](#) in Section 31 of the University Policy Manual, University Tenure Policy, Non-Academic Student Grievance Procedure in each school's catalog, or the [Student Code of Conduct](#)). The University Title IX Coordinator can help explain which policy will be used.

## **C. Jurisdiction of this Sexual Misconduct Policy**

The jurisdiction of this Sexual Misconduct Policy is broader than the jurisdiction required under the 2020 Title IX regulations. This Policy can also be applicable to conduct prohibited by this Policy, including conduct:

- That falls within the location of Title IX jurisdiction but does not meet the definition of conduct prohibited by Title IX and is therefore dismissed as a "Title IX Matter";
- That occurs outside the location of Title IX jurisdiction (off-campus misconduct, online misconduct, in the University's international programs) and that effectively deprives someone of access to the University's educational programs or activities; and
- Against a student that is prohibited under this Policy as "California Senate Bill (SB) 493 Sexual Harassment" that occurs in connection with any educational activity or other program of the University, as well as incidents that occurred outside of those educational programs or activities, whether they occurred on or off campus, if, based on

the allegations, there is any reason to believe that the incident could contribute to a hostile educational environment or otherwise interfere with a student's access to education.

#### **D. Jurisdiction of Other University Policies**

In cases where a University faculty or staff member is accused of other forms of misconduct in addition to Sexual Misconduct, Human Resources and/or the dean of the respective school may take immediate action following other policies governing misconduct, thereby making this Policy inapplicable (e.g., in cases where a faculty/staff member is immediately terminated). If the Respondent is a student and an employee, the University Title IX Coordinator will determine which University policy should apply based upon the facts and circumstances (including, but not limited to, the context of the prohibited conduct, the roles of the parties at the time of the conduct, and the location of the incident).

Formal complaints of Sex Discrimination by a student against another student may be resolved through the Office of Community Standards using the procedures in this Policy. Formal complaints of Sex Discrimination by a student against a Pepperdine employee may be resolved using the school's [Non-Academic Student Grievance Procedure](#). Formal complaints of Sex Discrimination, FEHA Sexual Harassment, or Sexual Exploitation by an employee against another employee may be resolved through the [Employee Grievance Procedure](#) in Section 31 of the University Policy Manual. Formal complaints of FEHA sexual harassment by an employee against a student may be resolved through the Office of Community Standards using the procedures in this Policy.

#### **V. University Title IX Coordinator**

The University designated La Shonda Coleman to serve as the University Title IX Coordinator. The University Title IX Coordinator is responsible for the University's overall compliance with Title IX and coordinates the University's efforts related to the intake, investigation, resolution, and implementation of supportive measures to stop, remediate, and prevent discrimination, harassment, and retaliation prohibited under this Policy. Upon receiving reports of Sexual

Misconduct, the University Title IX Coordinator or designee meets with the Complainant to ensure that supportive measures are in place and that appropriate procedures are followed to address the complaint in a manner that is fair to both the Complainant and the Respondent. The University Title IX Coordinator also ensures that proper [training](#) is provided to the officials involved in the process and coordinates educational programs for the entire University community. When appropriate, the University Title IX Coordinator may appoint a designee to conduct or assist with the stated duties in this Policy.

**Contact Information:**

***La Shonda Coleman***

University Title IX Coordinator

Student Care Team Chair

Associate Vice President for Student Affairs

Pepperdine University

24255 Pacific Coast Highway

Tyler Campus Center Suite 210

Malibu, CA 90263

[310-506-4436](tel:310-506-4436)

[lashonda.coleman@pepperdine.edu](mailto:lashonda.coleman@pepperdine.edu)

## **VI. Reporting Sexual Misconduct**

The University encourages all individuals to report incidents of Sexual Misconduct or suspected Sexual Misconduct, whether they are Complainants or Witnesses. Individuals subjected to Sexual Misconduct have several reporting options. At the University, individuals can anonymously report, confidentially report, or file a [formal complaint](#) of Sexual Misconduct, as explained below. Outside the University, individuals can report Sexual Misconduct to community resource centers that specialize in providing resources to victims of Sexual

Misconduct, file a criminal charge with local law enforcement, or file civil litigation against the Respondent. Individuals can also choose to pursue criminal charges (i.e., through the police and criminal courts). Individuals can choose to pursue University disciplinary options, if the Respondent is a University student or employee. Individuals may choose a combination of the above options, and some will choose none.

Under California law, the University is required to immediately, or as soon as practicably possible, disclose to local law enforcement any report of sexual assault, whether committed on-or-off campus. If the individual communicates to the University that they would like their identity withheld, the University will not disclose the individual's or the alleged Respondent's identity in its report to law enforcement.

### **Reporting Within the University**

Note: If there is any immediate danger and you are on the Malibu campus, call [911](#) first and then Public Safety at [310-506-4441](#) if safe to do so. If you are off-campus, call [911](#). If you are located at one of the University's graduate, DC, or international campuses, contact your program director or local law enforcement to obtain information regarding local counseling, medical, and legal resources available to you.

### **Reports to the University Title IX Coordinator**

Anyone may report Sexual Misconduct or Retaliation related to Sexual Misconduct (whether or not the person reporting is the person alleged to have been subjected to Sexual Misconduct or Retaliation) to the University by contacting the University Title IX Coordinator in person, by mail, by telephone, or by email, using the contact information listed above, or by any other means that results in the University Title IX Coordinator receiving the person's verbal or written report. Such a report may be made at any time, including during non-business hours, by using the telephone number or email address, or by mail to the office address.

An individual reporting Sexual Misconduct may do so verbally or in a written report. If a written report is submitted, it is helpful to have a brief written statement citing the type(s) of Sexual Misconduct that occurred (see [Definitions](#)) and supporting facts (e.g., Respondent name, what happened, when and where the incident occurred, Witness(es), etc.). A report is not the same as filing a Formal Complaint for Title IX Sexual Harassment. Individuals wishing to file a Formal Complaint should follow the process below.

### **Anonymous Reports**

Any individual may make an anonymous report concerning Sexual Misconduct. An individual may report the incident without disclosing names, identifying the Respondent, or requesting any action. Depending on the extent of information available about the incident or the individuals involved, however, the University's ability to respond to an anonymous report may be limited. The University may conduct an initial investigation to determine appropriate next steps.

Anonymous reports may be made on the anonymous Wave tip hotline by calling voicemail at [310-506-7634](tel:310-506-7634) or on the LiveSafe app. Public Safety will receive these reports and share them with the University Title IX Coordinator who will determine appropriate steps.

### **Responsible Employees**

With the exception of University employees designated as confidential resources (see [Confidential Resources](#)), all other University employees, including faculty and staff, are required to report immediately any information they know about suspected prohibited conduct or potential violations of this Policy. These individuals are referred to as responsible employees. Student workers who have supervisory responsibility or responsibility for the welfare of other students are also considered responsible employees when they learn of potential violations of this Policy in the scope of their employment.

Responsible employees must report all known information, including the identities of the parties, the date, time and location, and any details about the reported incident to the University Title IX Coordinator (see [Reports to the University Title IX Coordinator](#)). The

University Title IX Coordinator or designee will promptly contact the Complainant to discuss the availability of supportive measures, consider the Complainant's wishes with respect to supportive measures, inform the Complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the Complainant the process for filing a formal complaint. Responsible employees may provide support and assistance to a Complainant, Witness, or Respondent; but they cannot promise confidentiality or withhold information about prohibited conduct. Failure by a responsible employee to report suspected prohibited conduct in a timely manner may subject them to appropriate discipline, including removal from a position or termination of employment.

Responsible employees are not required to report information disclosed: 1) at public awareness events (e.g., "Take Back the Night," candlelight vigils, protests, "survivor speak-outs," or other public forums in which students may disclose prohibited conduct (collectively, public awareness events)); or 2) during an individual's participation as a subject in an Institutional Review Board-approved human subjects research protocol (IRB Research). However, the University may provide information about Title IX rights and about available University and community resources and support at public awareness events and an Institutional Review Board may, in appropriate cases, require researchers to provide such information to all subjects of IRB Research.

A Complainant may choose not to make a complaint or report in their own case, even if the Complainant would otherwise have reporting obligations by virtue of being a faculty member, staff member, or student worker.

## **Reporting Options Outside the University**

### **Community Resource Centers**

#### **The Santa Monica Rape Treatment Center**

Santa Monica-UCLA Medical Center

1250 16th Street

Santa Monica, CA 90404

424-259-7208

<http://www.therapefoundation.org>

Provides professional support, including counseling, medical, and advocacy services, to victims of sexual assault.

### **The Sojourn Services: The People's Concern**

2116 Arlington Avenue, Suite 100

Los Angeles, CA 90018

310-264-6644

<https://www.thepeopleconcern.org/>

Provides professional support, including counseling, medical, and advocacy services, to victims of domestic and dating violence. Sojourn also operates a crisis shelter.

### **Local Law Enforcement**

#### **Malibu/Lost Hills Sheriff Station**

27050 Agoura Road

Agoura Hills, CA 91301

818-878-1808 or 911 for emergency

<http://shq.lasdnews.net/pages/patrolstation.aspx?id=LHS>

For help in reporting the Sexual Misconduct to local law enforcement, call the Department of Public Safety 310-506-4700. It is important to understand that reporting Sexual Misconduct does not obligate the reporting party to press criminal charges. California law provides that individuals who experience sexual assault are encouraged to preserve evidence and to note the identity and location of Witnesses. Contacting law enforcement to make a report allows for forensic evidence to be collected, including an exam if needed, which may be helpful if a decision is made to pursue criminal charges.

### **Civil Court**

#### **Santa Monica Municipal Court**

1725 Main Street

Santa Monica, CA 90401

310-255-1840

<http://www.lacourt.org/courthouse/info/SM>

For help filing a civil lawsuit, please contact the Santa Monica Municipal Court.

### **Resources for Students and Employees Located Out of State or Abroad**

Students or employees participating in a program located out of state or abroad should consult with the program director for confidential reporting options, available community resources, and law enforcement contact information in their location

## **VII. Initial Assessment of Reports to the University Title IX Coordinator**

Upon receipt of a complaint or notice to the University Title IX Coordinator of an alleged violation of this Policy, the University Title IX Coordinator initiates a prompt initial assessment to determine the next steps the University needs to take and whether the matter should be handled as a Title IX matter, a complaint that does not meet the definition of a Title IX matter but is still handled under this Policy, or a complaint that falls under another University policy. The University Title IX Coordinator will initiate at least one of three responses:

1. Offer [supportive measures](#) because the Complainant does not want to file a [formal complaint](#); and/or
2. An [informal resolution process](#) (upon submission of a formal complaint) where the matter is appropriate for informal resolution; and/or
3. A [formal grievance process](#) including an investigation and a hearing (upon submission of a formal complaint).

## **VIII. Initial Meeting with the University Title IX Coordinator**

When allegations of Sexual Misconduct are reported, the University Title IX Coordinator or designee will promptly contact the Complainant to discuss the availability of supportive



measures, consider the Complainant's wishes with respect to supportive measures, inform the Complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the Complainant the process for filing a formal complaint. The University Title IX Coordinator or designee will also explain the options for a [formal grievance process](#) and an [informal resolution process](#). At this initial meeting, the University Title IX Coordinator will also explain the Complainant's and Respondent's right to an [Advisor](#). The Complainant may bring a support person to this initial meeting with the University Title IX Coordinator. The support person may also serve as the Complainant's Advisor in future meetings with University officials.

## **IX. Supportive Measures**

Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the Complainant or the Respondent before or after the filing of a formal complaint or where no formal complaint has been filed. Such measures are designed to restore or preserve equal access to the University's education programs or activities without unreasonably burdening the other party, including measures designed to protect the safety of all parties or the University's educational environment, or deter Sexual Misconduct. The University maintains as confidential any supportive measures provided to the Complainant or Respondent, to the extent that maintaining such confidentiality would not impair the ability of the University to provide the supportive measures.

During the initial meeting with the University Title IX Coordinator or designee, Complainants will have the opportunity to express what they would like in the form of supportive measures, and the University Title IX Coordinator will take into account the Complainant's wishes in determining which supportive measures to offer. The University Title IX Coordinator will facilitate the implementation of the supportive measures they deem appropriate.

## Available Supportive Measures

The University Title IX Coordinator, at their discretion, may implement supportive measures which may be applied to the Complainant and/or the Respondent including, but not limited to:

Mutual no contact directives in Title IX matters;

Imposition of mutual restrictions on contact between the parties (or a one-way no-contact order when appropriate) in Non-Title IX matters are subject to the following;

**Unilateral:** For Non-Title IX cases where the Complainant is a student and the Respondent is a member of the University's community, upon the request of the Complainant or where otherwise determined to be appropriate, the University shall issue an interim, unilateral no-contact order prohibiting the Respondent from contacting the Complainant during the pendency of the investigation;

**Mutual:** For Non-Title IX cases where the Complainant is a student, the University shall not issue a mutual no-contact order automatically but shall consider the specific circumstances of each case to determine whether such a directive is appropriate to:

Protect the non-complaining party's safety or well-being; or

Respond to interference in the grievance process.

Upon issuance of a mutual no-contact order in a Non-Title IX matter, the University shall provide the parties with a written justification for the order and an explanation of the terms of the order, including the circumstances, if any, under which a violation could be subject to disciplinary action.

Access to counseling services and assistance in setting up an initial appointment, on and off campus;

Rescheduling of exams or assignments;

Providing alternative course completion options;

Changing class schedules, including the ability to transfer course sections or withdrawal from a course without penalty;

Changing work schedules, job assignments, or work environment;

Changing a student's University-owned housing;  
Assistance from University support staff in completing University housing relocation;  
Limiting an individual's or organization's access to certain University facilities or activities pending resolution of the matter;  
Increased security and monitoring of certain areas of the campus;  
Voluntary leave of absence;  
Providing an escort to ensure safe movement between classes and activities;  
Providing medical services;  
Providing pregnancy support;  
Providing academic support services, such as tutoring; and/or  
Any other actions deemed appropriate by the University Title IX Coordinator.

## **X. Formal Complaint of Sexual Misconduct**

A "formal complaint" is a document filed by a Complainant or signed by the University Title IX Coordinator alleging Sexual Misconduct against a Respondent and requesting that the University investigate the allegation for potential adjudication of the matter. The formal complaint must be submitted to the University Title IX Coordinator in person, by mail, email, or through an online portal provided for this purpose by the University, with a physical or digital signature or which otherwise indicates that the Complainant is the person filing the formal complaint. At the time of filing a formal complaint, a Complainant must be participating in or attempting to participate in a University education program or activity.

Title IX requires that Complainants file a formal complaint requesting that the University proceed with an investigation of Title IX Sexual Harassment. This is meant to ensure that Complainants retain more autonomy and control over when the Complainant's reported victimization leads to a formal grievance process (described below). In rare circumstances, the University Title IX Coordinator may determine that an investigation is necessary over the wishes of a Complainant out of concerns for the welfare and safety of the Complainant and the

community (for example, to pursue a grievance process against a potential serial sexual perpetrator). If so, the University Title IX Coordinator will sign a formal complaint; however, the University Title IX Coordinator is not a Complainant or a party during the grievance process.

When weighing a Complainant's request that their identity remains confidential and/or that no investigation or discipline be pursued, the University Title IX Coordinator will consider a range of factors, including the following:

- the effect that non-participation by the Complainant may have on the availability of evidence and the University's ability to pursue the formal grievance process fairly and effectively;
- whether there have been other Sexual Misconduct complaints about the same Respondent;
- whether the Respondent has a history of arrests or records from a prior school indicating a history of violence;
- whether the Sexual Misconduct was perpetrated with a weapon, physical restraints, or engaged in battery;
- whether the Respondent threatened further Sexual Misconduct or other violence against the individual or others;
- whether the Sexual Misconduct was committed by multiple Respondents;
- whether the Respondent is a faculty, staff member, volunteer or advisor with oversight of students;
- whether there is a power imbalance between the Complainant and Respondent;
- whether the Complainant believes that they will be less safe if the Complainant's name is disclosed or an investigation is conducted;
- whether the Complainant is a minor; and/or
- whether the report reveals a pattern of perpetration (e.g., via illicit use of drugs or alcohol) at a given location or by a particular group.

The presence of one or more of these factors may lead the University to initiate its [formal grievance process](#) under this Policy. If none of these factors are present, the University Title IX Coordinator will typically honor the Complainant's decision not to file a formal complaint.

The decision to initiate a grievance process in situations where the Complainant does not want an investigation, or where the Complainant intends not to participate, will be made thoughtfully and intentionally, taking into account the circumstances of the situation, including the reasons why the Complainant wants or does not want the University to investigate. If the University Title IX Coordinator determines that a formal investigation is necessary over the wishes of a Complainant, the University will inform the Complainant prior to starting an investigation and will offer supportive measures and informal resolution options when appropriate. When the University proceeds with the formal grievance process (including the investigation and hearing), the Complainant (or their Advisor) may have as much or as little involvement in the process as desired. The Complainant retains all rights of a Complainant under this Policy irrespective of their level of participation. The University's ability to respond to the report may be limited if the Complainant does not want to proceed with an investigation and/or hearing process or requests that their identity remain confidential. The goal is to provide the Complainant with as much control over the process as possible, while balancing the University's obligation to protect the Complainant and the community. Complainants who elect to take no action can change that decision if they decide to pursue a formal complaint (See Appendix D: Time Limits on Reporting). After a formal complaint is filed, both parties will be given timely notice of meetings at which the parties (one or all) may be present.

## **XI. Informal Resolution Process**

Informal resolution is a voluntary process that a student Complainant and a student Respondent can mutually agree to participate in as an alternative to a [formal grievance process](#). An informal resolution process will not generally be offered to resolve allegations of Sexual Misconduct against a student by a University employee. However, as determined by the University Title IX Coordinator in consultation with other departments as necessary, informal resolution may be appropriate to resolve allegations of Sexual Misconduct against an employee by another University employee. In instances of non-Title IX sexual harassment complaints involving student Complainants against University employees, informal resolution will not be mandated by the University and informal resolution, even on a voluntary basis, will

not be used to resolve allegations of Sexual Violence as defined under state law and this Policy.

The informal resolution process timeline can vary, but typically can take 60 business days to reach a resolution; typically they are resolved earlier. The University will make a good faith effort to complete the informal resolution process as promptly as circumstances permit and will update the parties on the reason and timing of any delay.

Before initiating an informal resolution process, a Complainant first needs to submit a [formal complaint](#). If a Complainant or Respondent wishes to initiate an informal resolution, they should contact the University Title IX Coordinator to make this request.

All parties must consent to the use of informal resolution. However, the University Title IX Coordinator, in their sole discretion, determines whether the informal resolution process will be used in a matter. The University Title IX Coordinator may appoint a facilitator with appropriate training in Title IX and informal resolution processes to work with both parties toward a resolution.

It is not necessary to pursue informal resolution first in order to pursue a formal grievance process, and any party participating in informal resolution can stop the process at any time prior to reaching resolution and begin or resume the formal grievance process.

Prior to implementing an informal resolution, the University Title IX Coordinator will provide the parties with written notice of the reported misconduct and any sanctions or measures that may result from participating in an informal resolution process, including information regarding any records that will be maintained or shared by the University. The University will obtain voluntary, written confirmation that all parties wish to resolve the matter through informal resolution before proceeding and will not pressure the parties to participate in an informal resolution.

The informal resolution agreement is not subject to appeal once all parties indicate their written agreement to all terms of the informal resolution. After the written agreement is signed by both parties, the formal grievance process is no longer available concerning the allegations raised in the formal complaint.

When the parties cannot agree on all terms of resolution, the [formal grievance process](#) will resume at the same point where it was paused. Information disclosed during the informal resolution process that is not already in the record (e.g., in the formal complaint or from any investigation or hearing conducted before the information resolution process starts) is confidential and cannot be used in the formal grievance process that resumes after the informal resolution process is terminated.

When an informal resolution is accomplished, the appropriate responsive actions and/or mutually agreed upon sanctions are promptly implemented in order to effectively stop the harassment or discrimination, prevent its recurrence, and remedy the effects of the misconduct, both on the Complainant and the community. The University Title IX Coordinator maintains records of any resolution that is reached, and failure to abide by the resolution agreement may result in appropriate responsive and/or disciplinary actions.

## **XII. Formal Grievance Process**

### **Overview**

A formal complaint of Sexual Misconduct submitted by a Complainant (or the University Title IX Coordinator) will be initially assessed by the University Title IX Coordinator and thereafter processed as either a Title IX matter or a Non-Title IX matter.

If the University Title IX Coordinator determines that the complaint meets the Title IX criteria, there will be an investigation and a hearing.

If the University Title IX Coordinator determines that the complaint is not a Title IX matter, at any point from the filing of the complaint up to the time of the hearing, the matter will be dismissed as a Title IX matter and referred to the appropriate department for review and a possible hearing. If or when a Non-Title IX Sexual Misconduct matter is addressed under the broader sexual misconduct policy, the University Title IX Coordinator may decide to have the matter investigated, but after the investigation concludes, the Dean of Students or designee will review the final report and determine if there is sufficient evidence to conduct a hearing under the broader sexual misconduct Policy.

The investigation and adjudication of conduct prohibited by this Policy under this formal grievance process is not an adversarial process between the Complainant, the Respondent, and the Witnesses, but rather a process for institutions to comply with their obligations under existing law. The Complainant does not have the burden to prove, nor does the Respondent have the burden to disprove, the underlying allegation or allegations of behavior prohibited by this Policy.

Before the investigation begins, both parties will receive a written statement of the allegations with sufficient time to prepare before meeting with a trained, professional investigator, normally in the Department of Public Safety (DPS) or another internal or external investigator as designated by the University Title IX Coordinator. The purpose of the investigation is to collect the relevant evidence with the equitable participation of both parties. After the investigation is complete, a final investigation report is sent to both parties, as set forth below. The investigation report makes no conclusions about the allegations. Both parties have the opportunity to respond in writing to the evidence related to the allegations collected by the investigator(s), and then again to the final investigation report. The next step is to schedule a video conference hearing with both parties and their Advisors and any relevant Witnesses. The purpose of the hearing is to give both parties and Witnesses the opportunity to provide



testimony and respond to the evidence at the hearing with the decision maker(s). The hearing can include one decision maker (an administrative hearing) or a panel of three decision makers (a hearing panel). After the hearing the decision maker(s) will make factual findings, a determination of responsibility regarding the Sexual Misconduct allegation(s) and whether that violates this Policy and send that determination in writing to both parties. Either party may appeal the decision to a designated University Appeal Officer who was not involved in the investigation or hearing process. The Appeal Officer's decision is final. The University Title IX Coordinator will continue to work with both parties throughout this process, providing supportive measures and, if the Respondent is found responsible, coordinating with the Office of Community Standards regarding the implementation of sanctions and offering remedies to the Complainant to help restore access to the University's educational programs and activities.

### **Initial Assessment**

After receiving notice of conduct that may potentially violate this Policy or when a formal complaint has been filed by a Complainant, the University Title IX Coordinator will conduct an initial assessment. The initial assessment, may include determining whether the Sexual Misconduct alleged falls within the scope of Title IX. If a matter is "dismissed" as a Title IX, it does not mean the University will not take action, but instead it gives the University the ability to address the matter in a way it determines is in the best interest of the students involved. As set forth above in the Section, Procedures Required By the 2020 Title IX Regulations, under the Title IX regulations, the University must dismiss a formal complaint (or any allegations therein) as a Title IX matter if, at any time during the investigation or hearing, it is determined that:

The conduct alleged in the formal complaint would not constitute Title IX Sexual Harassment as defined in this Policy (see [Definitions](#)) even if proved; and/or  
The alleged conduct prohibited under Title IX did not occur in the University's educational programs or activities (includes locations, events, or circumstances over which the University exercises substantial control over both the Respondent and the

context in which the “sexual harassment” occurs, and also includes buildings or property controlled by officially recognized student organizations); and/or

The alleged conduct prohibited by Title IX did not occur against a person in the United States; and/or

At the time of filing a formal complaint as a Title IX matter, a Complainant is not participating in or attempting to participate in the education programs or activities of the University.

If a formal complaint is being dismissed as a Title IX matter, it may be still processed under this Policy or referred to another policy, as required by state law.

Under the 2020 Title IX regulations, the University may dismiss a formal complaint (or any allegations therein) as a Title IX matter if, at any time during the investigation or hearing:

A Complainant notifies the University Title IX Coordinator in writing that the Complainant would like to withdraw the formal complaint as a Title IX matter or any allegations therein (a Complainant who decides to withdraw a complaint may later request to reinstate it or refile it); or

The Respondent is no longer enrolled in or employed by the University; or

Specific circumstances prevent the University from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein.

If a formal complaint is being dismissed because it is not being handled as a Title IX matter, it may be still processed under this Policy as Non-Title IX Sexual Harassment or referred to another policy, as required by state law. (It may also be dismissed completely if it is not being handled as a Title IX matter and, even if true, would not meet any other definitions of prohibited conduct under this Policy.)

Upon any dismissal of the formal complaint as a Title IX matter or modification to the jurisdictional determination (Title IX or Non-Title IX), the University Title IX Coordinator will promptly send written notice of the dismissal or modification and the rationale for doing so simultaneously to the parties. In some cases, the dismissal may only be a procedural requirement under the Title IX regulations, because the 2020 Title IX regulations also allow and state law requires the University to still address the allegations using this Policy’s [formal](#)

[grievance process](#) or the [informal resolution process](#). Therefore, the University Title IX Coordinator will indicate in the written notice if the University will continue with investigation, and the dean of students will determine if there is sufficient information to conduct a hearing) under this Policy as a non-Title IX matter. If the University proceeds using the formal grievance process under this Policy for non-Title IX matters or another University policy, the parties will be notified of any procedural modification in the written notice of the allegations and/or the written notice of the hearing before the procedure begins (e.g., to time frames and cross examination requirements).

The formal complaint dismissal or modification decision is appealable within seven calendar days of the issuance date of the written notice of the dismissal to the Office of the Provost (email [provost@pepperdine.edu](mailto:provost@pepperdine.edu)) on any of the following bases:

1. Procedural irregularity that affected the outcome of the matter;
2. New evidence that was not reasonably available at the time the dismissal was made which could affect the outcome of the matter; or
3. The University 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 outcome of the matter.

The University will notify the other party in writing when an appeal is filed and will provide a copy of the appeal to the non-appealing party within 2 business days of the receipt of the appeal. Appeals procedures will be implemented equally for both parties, which includes the opportunity to submit a written statement in support of, or challenging, the dismissal decision. Any submissions from a party will be shared with the other party. The non-appealing party may provide a response to the appeal, but is not required to do so. The University will issue a written decision describing the result of the appeal and the rationale for the result, which will be provided simultaneously to both parties. The appeal process normally takes 15 business days from the time the appeal is submitted by either party. The Office of the Provost will make a good faith effort to complete the appeal process as promptly as circumstances permit and will update the parties on the timing of any delay and the reasons for the delay.

## **Written Notice of the Allegations**

Upon receipt or issuance of a formal complaint, the University Title IX Coordinator will provide the Complainant and Respondent (or the parties who are known at the time) a written notice that includes:

Notice of the University's formal grievance process and informal resolution process.

Notice of the allegations of Sexual Misconduct (see [Definitions](#)), including sufficient details known at the time and with sufficient time (normally two calendar days) to prepare for the initial investigatory interview. Sufficient details include the identities of the parties involved in the incident, if known, the conduct allegedly constituting Sexual Misconduct, and the date and location of the alleged incident, if known.

A statement that the Respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the grievance process.

A statement that the parties may have an Advisor of their choice, who may be, but is not required to be, an attorney, and may inspect and review evidence as described in the Formal Investigation section below.

A reference to the provision in this Policy that prohibits knowingly making false statements or knowingly submitting false information during the grievance process.

A statement about the University's policy on Retaliation.

Information on how parties may request disability accommodations during the formal grievance (including investigation and hearing) and informal resolution processes.

If, in the course of an investigation, the University decides to investigate allegations regarding the Respondent that are not included in the original written notice, the University will provide notice of the additional allegations to the parties whose identities are known.

The written notice will be delivered by one or more of the following methods: emailed to the parties' University email or designated accounts, in person, or mailed to the local or permanent address(es) of the parties as indicated in official University records.

## **Formal Investigation**

### **Authority and Responsibility**

Investigations are conducted by trained, professional investigators, normally in the Department of Public Safety (DPS). In some cases, the University may choose to utilize the services of an outside investigator to conduct the investigation, which will follow the procedures below and be overseen by the University Title IX Coordinator.

### **Investigation Timeline**

Investigations are completed expeditiously, normally within 90 business days (approximately 4.5 months), though some investigations may take longer, depending on the nature, extent, and complexity of the allegations, availability and number of Witnesses, law enforcement involvement, etc. If there is a delay, the University will communicate in writing the anticipated duration of the delay and reason to the parties. Investigations are typically not delayed, altered, or precluded on the grounds that civil or criminal charges involving the underlying incident(s) have been filed or that criminal charges have been dismissed or reduced. The University will make a good faith effort to complete investigations as promptly as circumstances permit and will communicate regularly with the parties to update them on the progress and timing of the investigation, including the reason for any delay. The University will not unreasonably deny a student party's request for an extension of a deadline related to a complaint during periods of examinations or school closures.

### **Participation Expectations of the Complainant and Respondent**

In order to comply with the typical investigation timeframe, it is imperative that both the Complainant and Respondent are responsive to outreach by University personnel. To support this outcome, a reasonable timeframe for responding to University personnel is within two business days. If a Complainant is not responsive, the University Title IX Coordinator has the discretion to make a determination about next steps including rendering the matter as closed. If the Respondent is not responsive, the University Title IX Coordinator has the discretion to move forward with the formal grievance process using the information available without the

participation of the Respondent. Both parties can expect to receive follow up communications to support their participation and the University's efforts to address an alleged matter.

### **Participation of Witnesses in the Investigation**

Normally interviews for parties and all Witnesses are conducted in person; however, circumstances (e.g., study abroad, summer break) may require individuals to be interviewed remotely. In exceptional circumstances, Witnesses may also provide written statements in lieu of interviews, if deemed appropriate by the investigator(s). If a Witness submits a written statement, but is not present to testify at a subsequent hearing, their written statement may not be able to be used as evidence, if (1) the Respondent is a student; (2) the Respondent is facing significant disciplinary sanctions; (3) it is necessary to evaluate the credibility of the Witness.

### **Recording of Interviews**

No unauthorized audio or video recording or transcription of any kind is permitted during investigation meetings. The investigator(s) will audio and/or video record interviews of the Parties and, at their discretion, the Witnesses, and all involved interviewees will be made aware of audio and/or video recording. Recordings or transcriptions of investigation meetings will not be shared with any involved party (Complainant, Respondent, Advisor, or Witnesses); however, a summary of any relevant evidence obtained in an investigation interview that is directly related to the allegations raised in the formal complaint will be shared in writing with the Complainant and Respondent and their Advisors as described below in the investigation process.

### **Investigation Process**

**When investigating a formal complaint, Pepperdine will:**

1. Ensure that the burden of proof and the burden of gathering evidence sufficient to reach a determination regarding responsibility rests on the University and not on the parties. The University cannot access, consider, disclose, or otherwise use a party's records that are made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in the professional's or paraprofessional's

capacity, or assisting in that capacity, and which are made and maintained in connection with the provision of treatment to the party, unless the University obtains that party's voluntary, written consent to do so for the grievance process under this Policy.

2. Provide an equal opportunity for the parties to present Witnesses and other inculpatory and exculpatory evidence. Inculpatory evidence tends to incriminate or place responsibility on someone, and exculpatory evidence tends to show a person's innocence.
3. Not restrict the ability of either party to discuss the allegations under investigation or to gather and present relevant evidence.
4. Provide the parties with the same opportunities to have others present during any investigation meeting, including the opportunity to be accompanied to any related meeting or proceeding by the Advisor of their choice. However, the Advisor cannot speak for the parties. The role of the Advisor is to accompany the parties and advise them privately. See [Role of Advisors](#) for additional information.
5. Provide, to a party, written notice of the date, time, location, participants, and purpose of all investigative interviews with sufficient time (normally two calendar days) for the party to prepare to participate.

Provide a review process as follows:

6. Provide a review process as follows:
  - a. **Evidence Review:** The University will provide both parties an equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in a formal complaint, including the evidence upon which the University does not intend to rely on in reaching a determination regarding responsibility and inculpatory or exculpatory evidence whether obtained from a party or other source, so that each party can meaningfully respond to the evidence prior to conclusion of the investigation. The University will send to each party and the party's Advisor, if any, the evidence subject to inspection and review in an electronic format. In order to protect confidential information, the investigator will redact or remove information that is not directly related to the allegations (or that is otherwise barred from use under Title IX, such as information protected by a legally recognized privilege, or a party's treatment records if the party has not given written consent) before

sending the evidence to the parties for inspection and review. The evidence will be emailed to the parties' University email account and the Advisors' (if any) email account provided to the University by the parties.

- b. **Evidence Response:** The evidence review and response period begins on the date that the University emails the parties with the evidence. The parties will have ten calendar days to submit a written response to the evidence, which the investigator will consider prior to completion of the final investigative report. The parties may elect to waive the full review period days. Both parties may provide additional evidence in their response.
- c. **Sharing of Response:** Each party's written response to the evidence, if submitted, will be shared with the other party within two business days of the deadline for submission. No rebuttal is permitted unless approved by the investigator(s).
- d. **Use of Response in Final Investigation Report:** Upon receipt of the parties' written responses, the investigator(s) will incorporate relevant elements of the parties' written responses into the final investigation report, include any additional relevant evidence, and make any necessary revisions.
- e. **Review of Final Investigation Report:** The investigator(s) shall create a final investigation report that includes a description of the procedural steps taken during the investigation and that fairly summarizes relevant evidence. (For Non-Title IX matters, the University reserves the right to have the report contain just the factual findings.) The report will be sent to each party and the party's Advisor, if any, in an electronic format for their review, no less than ten days prior to a hearing. Any notice of hearing shall account for this review period.
- f. **Response to Final Investigation Report:** The parties will have ten calendar days to submit a written response to the Final Investigation Report. The parties may elect to waive the full ten calendar days. Both parties may provide additional evidence in their response. Each party's written response, if submitted, will be shared with the other party prior to the hearing. Parties will have the opportunity to respond to any new evidence at the hearing, for cases involving hearings.
- g. **Evidence at Hearing:** The University will make all evidence subject to the parties' inspection and review, including any written responses, available at a hearing (if any) following the investigation to give each party equal opportunity to



refer to such evidence during the hearing, including for purposes of cross-examination.

### **Evidentiary Considerations in the Investigation**

The investigation does not consider: 1) incidents not directly related to the possible violation, unless they are considered relevant because, for example, they evidence a pattern; or 2) evidence about the Complainant's sexual predisposition or prior sexual behavior, unless such 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 3) the existence of a dating relationship or prior or subsequent consensual sexual relations between the Complainant and the Respondent unless the evidence is relevant to how the parties communicated consent in prior or subsequent consensual sexual relations.

### **Sexual Misconduct Claims that are not Title IX "Sexual Harassment"**

For allegations of Sexual Misconduct that fall outside the jurisdiction of Title IX, the University Title IX Coordinator in collaboration with the investigator(s) reserves the right to modify the investigation procedures, including but not limited to timelines. For example, the University may reduce the number of days provided to the parties to review the related evidence and the final investigation report if it is determined that this may help provide a prompt resolution without compromising a thorough, reliable, impartial, and fair process for both parties. The parties will be notified of any modifications in the written notice of the allegations that is sent by the University Title IX Coordinator before the investigation begins.

### **Hearing Procedures**

After the final investigation report is shared with the parties, the University Title IX Coordinator will (1) refer the matter for a live hearing; or (2) dismiss the matter if all of the allegations, even if true, would not constitute a violation of this Policy. The University Title IX Coordinator may also refer all or part of the matter to another policy if another University policy addresses the alleged behavior.

At the discretion of the Hearing Officer, in consultation with the University Title IX Coordinator, the hearing can be with one decision maker (an administrative hearing) or with three decision makers (a hearing panel). The hearing panel will include two University faculty and/or staff members in addition to a designated chair, with a mix of both male and female members, and will not include students. In some cases, the University may choose to utilize the services of an outside Hearing Officer to conduct the hearing, which will follow the procedures below and will be overseen by the University Title IX Coordinator.

All hearings will be conducted via video conferencing that will allow all parties, Witnesses, and other participants simultaneously to see and hear the party or Witness that is answering questions or addressing the Hearing Officer.

Other than as outlined below, hearings need not adhere to formal rules of procedure or evidence followed by courts of law.

For allegations of Sexual Misconduct that fall outside the jurisdiction of Title IX (see [Jurisdiction of the Policy](#)), the Hearing Officer reserves the right to modify the above hearing procedures. For example, in allegations of Sexual Assault occurring outside of Title IX's jurisdiction, the University may rely upon indirect cross-examination to conduct a thorough, reliable, impartial, and fair hearing process. Parties will submit cross-examination questions to the Hearing Officer who, after determining relevance, will ask the questions directly to the parties rather than having an Advisor ask the cross-examination questions. The parties will be notified of any hearing procedure modifications in the written notice of the hearing that is sent by the Hearing Officer before the hearing. For cases that are not being handled as a Title IX matter, direct cross examination by a party or a party's Advisor are prohibited.

### **Authority and Responsibility**

The term "Hearing Officer" is used throughout these hearing procedures to refer to either: 1) the chair of the hearing panel (three decision makers); or 2) the person who is the single decision maker of the administrative hearing.

When the Respondent is a student, the Office of Community Standards is responsible for the hearing, which is normally conducted by the dean of students or designee. When a hearing panel of three decision makers is convened, the dean of students serves as the chair and is one of the three decision makers. If the dean of students conducts an administrative hearing, the dean serves as the sole decision maker. In this Policy, the dean of students or designee is referenced as the Hearing Officer for both administrative hearings and hearing panels.

When the Respondent is a Pepperdine employee, Human Resources (HR) is responsible for conducting the hearing with a trained decision maker(s). When an administrative hearing is conducted, Human Resources will appoint one decision maker who serves as the Hearing Officer. When a hearing panel is used, Human Resources will appoint three decision maker(s) including one designated chair, who is referenced in this Policy as the Hearing Officer.

At the hearing, the decision maker(s) has the authority to hear and make determinations on all allegations of Sexual Misconduct and/or Retaliation and may also hear and make determinations on any additional alleged policy violations by the Respondent that have occurred in connection with the Sexual Misconduct allegations (e.g., violations by the Respondent of the Alcohol and Other Drug Use Policy, violations of the No Contact Directive, etc.). The Hearing Officer may designate a staff member to serve as the hearing facilitator, which includes, for example, scheduling the hearing, distributing materials to participants, ensuring that the virtual conferencing and recording technology is working as intended, and coordinating the flow of Witnesses and other participants in and out of the video conferencing as appropriate. The University will provide a transcript of the hearing to the parties for inspection and review upon request.

### **Hearing Timeline**

The hearing cannot be less than ten calendar days from the date that the final investigation report is transmitted to the parties. Normally, the hearing will be scheduled at least ten days after the deadline for responding to the Final Investigation Report. However, all parties (the Complainant and the Respondent) and the decision maker may agree to an expedited timeline.

Hearings may be conducted prior to, simultaneously with, or following criminal or civil proceedings. After the hearing is concluded, a written letter of determination is normally sent to both parties within three business days. The time frame from the notice of the hearing to the written letter of determination is normally 15 business days. When employee Respondents are involved and sanctions are recommended by the decision maker(s), additional time may be necessary for a sanction review by the appropriate supervisor or faculty body. The sanctions are included in the written letter of determination, which concludes the hearing process. The Hearing Officer will make a good faith effort to complete the hearing process as promptly as circumstances permit and will update the parties on the reason and timing of any delay of the hearing or the written letter of determination. The Hearing Officer will not unreasonably deny a student party's request for an extension of a deadline related to a complaint during periods of examinations or school closures.

#### **Notice of Hearing (For Cases Involving Hearings)**

No less than ten calendar days prior to a hearing, the Hearing Officer will simultaneously send notice of the hearing to the parties' University email account. The notice will contain:

1. A description of the alleged violation(s) and a list of all policies allegedly violated.
2. The time and date of the hearing and a reminder that attendance is mandatory, superseding all other University activities.
3. A description of the video conferencing technology that will be used to facilitate the hearing with the parties in separate locations and enables the decision maker(s) and parties to see and hear a party or Witness answering questions or addressing the Hearing Officer.
4. A list of all those who will attend the hearing, along with an invitation to object to any decision maker on the basis of demonstrated bias. This must be raised with the Hearing Officer (regarding hearing panel members) or the University Title IX Coordinator (regarding the Hearing Officer) in writing at least seven calendar days prior to the hearing.
5. A copy of all the materials provided to the decision maker(s) about the matter, unless they have been provided already. This includes, for example, the final investigation

report, the parties' written responses to the report (if submitted), and any relevant materials the Hearing Officer has approved to be reviewed at the hearing.

6. An invitation to each party to identify any relevant Witnesses in the final investigation report whose:
  - a. Testimony is requested at the hearing; and
  - b. Testimony is sufficient in the report and does not need to present live testimony or submit to cross-examination questions by the party's Advisor at the hearing. If there is agreement by both parties, and the credibility or live testimony of the Witness is not critical to the adjudication of the allegations, the Hearing Officer may determine that it is not necessary to require the Witness to attend the hearing, and the decision maker(s) will rely upon the Witness' testimony in the final investigation report in making its determination of responsibility.
7. An invitation to each party to submit the questions they intend their Advisor to ask the other party or Witnesses at the hearing, so that the Hearing Officer can rule on their relevance ahead of time to avoid any delays in the hearing or to provide recommendations for more appropriate phrasing. Parties will also be given the opportunity to submit questions during the live hearing. Only hearings conducted under the Title IX regulations will use direct cross examination by an Advisor. All other hearings may use indirect cross examination through the Hearing Officer.
8. An invitation to contact the Office of Student Accessibility (students) or Human Resources (employees) to arrange any disability accommodations or interpretation services that may be needed at the hearing, at least seven calendar days prior to the hearing.

## **Witnesses**

The Hearing Officer will schedule critical Witnesses to appear at a portion of the live hearing in order to present testimony and to respond to questions from the decision maker(s) and the parties, after which they will be excused.

## **Evidentiary Considerations in the Hearing**

Generally, the parties may not introduce evidence, including witness testimony, at the hearing that the party did not identify during the investigation and that was available at the time of the

investigation. However, the Hearing Officer has discretion to accept for good cause, or exclude, such new evidence offered at the hearing. If the Hearing Officer does not allow the admission of the new evidence, the Hearing Officer may delay the hearing and instruct that the investigation needs to be re-opened to consider that evidence.

Any evidence the decision maker(s) determines relevant and credible may be considered. The decision maker(s) does not consider Incidents not directly related to the possible violation, unless they are considered relevant because, for example, they evidence a pattern.

In matters that have been designated as Title IX matters, as required by the 2020 Title IX regulations, the decision maker(s) does not consider:

questions and evidence about the Complainant's sexual predisposition or prior sexual behavior, 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  
the past sexual history of a Complainant unless the questions and evidence concerns specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.

In Non-Title IX matters, the decision maker(s) does not consider the past sexual history of a Complainant or Respondent, subject to certain exceptions. As required by state law, the decision maker(s) does not consider:

prior or subsequent sexual history between the Complainant and anyone other than the Respondent for any reason unless directly relevant to prove that physical injuries alleged to have been inflicted by the Respondent were inflicted by another individual, or the existence of a dating relationship or prior or subsequent consensual sexual relations between the Complainant and the Respondent unless the evidence is relevant to how the parties communicated consent in prior or subsequent consensual sexual relations. Where the the decision maker(s) allows consideration of evidence about a dating relationship or prior or subsequent consensual sexual relations between the Complainant and the Respondent, the mere fact that the Complainant and Respondent engaged in other

consensual sexual relations with one another is never sufficient, by itself, to establish that the conduct in question was consensual.

Before allowing the consideration of any evidence of past sexual history, the decision maker(s) shall provide a written explanation to the parties as to why consideration of the evidence is consistent with this Policy.

Previous disciplinary action of any kind involving the Respondent may be considered in determining an appropriate sanction upon a determination of responsibility. This information is only considered at the sanction stage of the process during deliberation by the decision maker(s) following the live hearing with the parties.

#### **Other Hearing Procedures**

1. The Hearing Officer will answer all questions of procedure raised before or during a hearing.
2. When using a hearing panel, the Hearing Officer will give the panelists a list of the names of all parties, Witnesses, and Advisors in advance of the hearing. Any panelist who cannot make an objective determination must recuse themselves from the hearing proceedings.
3. In hearings involving more than one Respondent or in which two or more Complainants have accused the same individual of substantially similar conduct, the default procedure will be to hear the allegations jointly. However, the University Title IX Coordinator, in consultation with the appropriate office(s) (e.g., Department of Public Safety, Human Resources, or the Office of Community Standards), may permit the investigation and/or hearings pertinent to each Respondent to be conducted separately if there is a compelling reason to do so. In joint hearings, separate determinations of responsibility will be made for each Respondent with respect to each alleged Policy violation.
4. The decision maker(s) may not draw any inference solely from a party's or Witness's absence from the hearing or refusal to answer cross-examination or other questions.
5. The University will make all evidence subject to the parties' inspection and review, including any written responses, available at the hearing (generally via the same prehearing electronic format or tool used to provide access for review) to give each

party equal opportunity to refer to such evidence during the hearing, including for purposes of cross-examination.

6. Parties may confer with their Advisor during the hearing, but if a party repeatedly confers with the Advisor every time a question is asked, the Hearing Officer may inform the party that such conduct will be considered when weighing the party's credibility. Also, the Hearing Officer reserves the right to limit the timing and length of breaks requested by parties to confer with Advisors, and any conferring must be in private so that it does not disturb the hearing and is not overheard by other participants.
7. If, during the course of the hearing, additional policy violations are discovered, the Respondent will be notified of the new alleged violation(s) and will be granted additional time, if needed, for an investigation to be conducted and/or to prepare a defense of the new alleged violation(s). The Respondent may waive an investigation related to the new alleged violation(s) and/or the additional time to prepare a defense, and the hearing can proceed with the new alleged violation(s) taken under consideration by the decision maker(s). A record will be made of the additional alleged violation(s) and whether or not the Respondent waived or requested an investigation to be conducted and/or additional preparation time.
8. The University will provide a transcript of the hearing to both parties upon request for purposes of review in the event of an appeal. The parties may not record the hearing and no other unauthorized recordings are permitted.

#### **Procedures for Questioning in All Matters**

All questioning must follow the hearing procedures and the University's rules of decorum, which prohibit questioning in an abusive, badgering, intimidating, or disrespectful manner. If a party or a party's Advisor of choice refuses to comply with these rules of decorum for the hearing, the Hearing Officer may require the party to use a different Advisor. For Title IX matters, if a University-provided Advisor refuses to comply with these rules of decorum, the Hearing Officer may provide that party with a different Advisor to conduct cross-examination on behalf of that party.

The parties may submit questions in advance or during the hearing. The procedures for conducting questioning are set forth below. Before a Complainant, Respondent, or Witness answers a question, the Hearing Officer must first determine whether the question is relevant and explain any decision to exclude a question as not relevant. This applies to questions



submitted prior to or during the hearing. All questions will be heard by the parties. After the question is heard, the Hearing Officer will pause the hearing to ensure that the question is relevant before instructing a party or Witness to answer the question. The parties or Advisors may immediately challenge any decision regarding relevance by the Hearing Officer, who may pause the hearing and consult with others before making a final ruling on the challenge. Duplicative questions are irrelevant and will not be permitted by either party. The Hearing Officer shall have the authority to discard or rephrase any question that the Hearing Officer deems to be repetitive, irrelevant, or harassing.

**Exclusion Rule:** For cases involving student Sexual Misconduct where significant disciplinary sanctions are possible and the credibility of a party or Witness must be determined by the decision maker(s), if a party or Witness chooses not to submit to questioning at the hearing, then the decision maker(s) may not rely on any prior statement made by that party or Witness at the hearing (including those contained in the investigation report) in the ultimate determination of responsibility. The decision maker(s) must disregard any statements by that Party or Witness that were not made during the hearing. There are two exceptions: (1) evidence that is something other than a statement that needs testing by the party or Witness may be considered (e.g., video evidence of the misconduct); and/or (2) if the statements of a Respondent who is refusing to submit to cross-examination or refuses to attend the hearing are the subject of the allegation itself (e.g., the case is about verbal harassment or a quid pro quo offer), then those statements are not precluded from admission.

### **Procedures for Questioning in Title IX Matters**

The Title IX regulations grant the right of cross-examination through an Advisor equally to Complainants and Respondents in Title IX matters. At a hearing on a Title IX matter, the Title IX regulations require that the decision maker(s) must permit each party's Advisor to cross examine the other party and any Witnesses. This means that a party's Advisor may ask the other party and any Witnesses all relevant questions and follow-up questions, including those

challenging credibility. Such cross-examination at the live hearing must be conducted directly, orally, and in real time by the party's Advisor of choice and never by a party personally.

If a party does not have an Advisor for a hearing, the University will appoint an Advisor for the limited purpose of conducting any direct cross-examination in a Title IX matter. A party may reject this appointment and choose their own Advisor, but a party may not proceed with the hearing without an Advisor. If the party's Advisor will not conduct direct cross-examination in a Title IX matter, the party must notify the Hearing Officer no less than five days before the hearing and the University will appoint an Advisor who will do so, regardless of the participation or non-participation of the advised party in the hearing itself. If a University-appointed Advisor is used by a party to conduct cross-examination, the role of that Advisor is to relay any questions the party wishes to ask the other party or Witnesses. The University-appointed Advisor will not develop questions independently on behalf of the party.

#### **Procedures for Questioning in Non-Title IX Matters**

For cases that have not been designated as Title IX matters, the Hearing Officer shall ask all questions of the parties and Witnesses. The parties may submit questions to the Hearing Officer in advance or during the hearing.

#### **Hearing Order**

1. The Hearing Officer confirms that all the participants, including the Complainant, Respondent, Advisors, decision maker(s), and hearing facilitator, are present at the video conference, and invites the participants to introduce themselves. The introductions will also allow the hearing facilitator to confirm that all participants can see and hear each other.
2. The Hearing Officer provides an overview of the hearing agenda and a list of the Witnesses (if any) in the order they are scheduled to participate in the hearing.
3. The Hearing Officer asks the parties and Witnesses to provide any relevant information beginning with the Complainant and then in the order determined by the Hearing Officer. The decision maker(s) ask questions directly to the parties and Witnesses about their testimony or relevant evidence in the materials provided to the participants in advance of the hearing. The parties and Witnesses will submit to questioning by the decision

maker(s) and then by the parties through their Advisors (“cross-examination”) in Title IX matters or through the Hearing Officer or decision-maker(s) in all other matters after the Hearing Officer reviews each question for relevance before it is asked by the Advisor. Witnesses are excused from the hearing following the cross-examination.

4. The Hearing Officer offers both parties the opportunity to make a brief closing statement (maximum of five minutes) to the decision maker(s). Advisors are not allowed to make closing statements.

### **Determination of Responsibility**

The decision maker(s) will deliberate in closed session to determine whether the Respondent is responsible for the Policy violation(s). If a hearing panel is used, a simple majority vote is required to determine the finding. The preponderance of the evidence standard of proof is used (whether it is more likely than not that the Respondent violated the Sexual Misconduct Policy).

### ***Student Respondents***

If a hearing panel is used, the panelists will recommend the appropriate sanction(s) to the Hearing Officer, who will make the final determination on sanctions. The Hearing Officer may consult with the University Title IX Coordinator on any appropriate remedies for the Complainant.

### ***Employee Respondents***

If the decision maker(s) decides that there was a policy violation, they will recommend sanctions against the faculty or staff member. The decision and any sanction recommendations against a staff member will be forwarded to Human Resources for a decision on the recommended sanction(s). The decision and any sanction recommendations against a faculty member will be forwarded to the dean of the faculty member’s school for a decision on the recommended sanctions(s), and any other applicable procedures (e.g., [University Tenure Policy](#)), will be followed prior to the sanction becoming final. After receiving the decision on the recommended sanction(s) from Human Resources or the school’s dean, the Hearing Officer will include the final sanctions in the written letter of determination. The

Hearing Officer may consult with the University Title IX Coordinator on any appropriate remedies for the Complainant.

### ***Written Letter of Determination***

The Hearing Officer will then prepare a written letter of determination. The letter of determination will identify the specific policy(ies) reported to have been violated, and will contain a description of the procedural steps taken by the University from the receipt of the formal complaint through the determination, including any notifications to the parties, interviews with parties and Witnesses, site visits, methods used to gather other evidence, and hearings held. The letter will also specify the finding on each alleged policy violation; the findings of fact that support the determination; conclusions regarding the application of the relevant policy to the facts; a statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility, any disciplinary sanctions the University imposes on the Respondent, and whether remedies designed to restore or preserve equal access to the University's education programs or activities will be provided by the University to the Complainant. The remedies are not typically shared with the Respondent unless the remedy directly relates to the Respondent. The University Title IX Coordinator is responsible for the implementation of any remedies.

Finally, the letter of determination will include the University's procedures and permissible bases for the Complainant and Respondent to appeal. Any sanctions imposed as a result of the hearing are stayed during the appeal process. To best provide support, parties are encouraged to let the Hearing Officer know immediately if they are appealing so that the sanctions (if any) may be stayed and the appropriate offices may be notified.

This letter of determination will be shared with the parties simultaneously by one or more of the following methods: emailed to the parties' University email or designated accounts, delivered in person, or mailed to the local or permanent address(es) of the parties as indicated in official University records.

The determination regarding responsibility becomes final after the time period to file an appeal has expired, or if a party does file an appeal, after the appeal decision has been sent to the parties.

## **Appeal Process**

Both parties may appeal a determination of responsibility by the decision maker(s) to an Appeal Officer. For cases involving student Respondents, either party may send their appeal to the Office of Community Standards. For cases involving employee Respondents, either party may send their appeal to an Appeal Officer, who is either: 1) appointed by Human Resources (when the employee Respondent is a staff member); or 2) the Provost (or designee) when the employee Respondent is a faculty member.

The appeal must be submitted in writing via email or an online appeal form within seven calendar days of the issuance date of the written letter of determination. Any sanctions imposed as a result of the hearing are stayed during the appeal process.

In the written appeal, the party must specifically address at least one of the following criteria:

1. New evidence that was not reasonably available at the time the determination regarding responsibility was made that could affect the outcome of the matter. The appealing party must provide a summary of this new evidence and its impact.
2. Procedural irregularity that affected the outcome of the matter. The appealing party must identify the specific investigative or hearing procedure that was not followed, along with a summary of how it affected the outcome of the matter.
3. Bias or conflict of interest by the University Title IX Coordinator, investigator(s) or decision maker(s) for or against Complainants or Respondents generally or the individual Complainant or Respondent that affected the outcome of the matter. The appealing party must state the basis for this belief and provide any supporting information.
4. Inappropriateness of the sanction for the violation of the Policy.

The written appeal will be shared with the other party, who may submit a written response within seven calendar days from the time the appeal is emailed to the student's or employee's pepperdine.edu account. This written response will be shared with the other party.

The appeal process normally takes 20 business days from the time the appeal is submitted by either party. The Appeal Officer will make a good faith effort to complete the appeal process as promptly as circumstances permit and will update the parties on the timing of any delay and the reasons for the delay.

The Appeal Officer may, but is not required to, convene an advisory committee to assist in making a recommendation regarding the appeal. The Appeal Officer will not be bound by the committee's recommendation.

If the Appeal Officer convenes an advisory committee to meet with a party, the party may be assisted at the meeting by an Advisor. The Advisor cannot speak for the party. The role of the Advisor is to accompany the party student and advise them privately during the meeting.

The Appeal Officer may affirm, reverse, or modify the sanction. The Appeal Officer may also return the case to the decision maker(s) for further consideration. The Appeal Officer's decision will be final and effective immediately. A letter describing the result of the appeal and the rationale for the decision will be emailed simultaneously to both parties' pepperdine.edu account.

### **Appeals In Non-Title IX Matters**

For allegations of Sexual Misconduct that fall outside the jurisdiction of Title IX (see Title IX and Jurisdiction of the Policy), the Appeal Officer reserves the right to modify the appeal process (e.g., timeframes), as long as both parties are allowed to appeal the outcome and any modifications apply equally to all parties. The parties will be notified of any appeal process modifications by the Appeal Officer before the appeal review.

### **XIII. Review Process and Acknowledgement of Sources**

This Policy is reviewed every year by the SaVE (Sexual Violence Elimination) Team Policy and Protocol Committee, which includes representatives from the following University areas: Community Standards, General Counsel, Graduate School of Education and Psychology, Graziadio Business School, Human Resources, Public Safety, School of Law, School of Public Policy, Seaver College, Student Affairs, and the University Title IX Coordinator. Student groups and individuals who have utilized previous versions of this Policy have also provided feedback. We gratefully acknowledge the use and adaptation of model policies by peer institutions and professional organizations, including the Novus Law Firm (Natasha Baker), and the ATIXA (Association of Title IX Administrators) One Policy, Two Procedures Model, portions of which have been adapted with permission in this Policy. Individual student, faculty, and staff input is welcome at any time using the Policy contact information below.

**Last Updated: September 13, 2023**

**Policy Contact:** [University Title IX Coordinator](#) or [Community Standards](#)

**Additional Resources:** [Title IX Process Overview Flowchart](#)

**Note:** All formal sexual misconduct grievances filed before September 13, 2023 will be addressed using the [2022-2023 Sexual Misconduct Policy](#).

## **Appendix A: Sexual Misconduct Definitions**

Sexual Misconduct is an umbrella term that includes all of the conduct prohibited below, except where noted.

A matter will be designated as a Title IX matter if the conduct is alleged to meet one or more of the following definitions below and satisfies the Title IX jurisdictional location requirement:

- Title IX Sexual Harassment (Environment)
- Title IX Sexual Harassment (Quid Pro Quo)
- Sexual Assault
- Dating Violence
- Domestic Violence
- Stalking

A matter will be designated as a Non-Title IX matter if the conduct is alleged to meet one or more of the following definitions or if it meets a definition of prohibited conduct under Title IX but does not satisfy the Title IX jurisdictional location requirement:

- Non-Title IX (SB 493) Sexual Harassment
- Sexual Violence
- Rape
- Sexual Battery
- Sexual Exploitation

### **Title IX Sexual Harassment (Environment)**

Sexual Harassment (Environment) prohibited by Title IX is defined as unwelcome conduct determined by a reasonable person to be so severe, pervasive (more than once), and objectively offensive that it effectively denies a person equal access the University's education program or activity

### **Title IX Sexual Harassment (Quid Pro Quo)**

Quid Pro Quo Sexual Harassment prohibited by Title IX occurs when a University employee



conditions the provision of an aid, benefit, or service of the University on an individual's participation in unwelcome sexual conduct.

### **Non-Title IX (SB 493) Sexual Harassment**

Under California law, Non-Title IX Sexual Harassment is broader than Sexual Harassment prohibited by Title IX and is defined as conduct against a student that includes unwelcome sexual advances, requests for sexual favors, and other verbal, visual, or physical conduct of a sexual nature, made by someone from or in the work or educational setting, under any of the following conditions:

Submission to the conduct is explicitly or implicitly made a term or a condition of an individual's employment, academic status, or progress.

Submission to, or rejection of, the conduct by the individual is used as the basis of employment or academic decisions affecting the individual.

The conduct has the purpose or effect of having a negative impact upon the individual's work or academic performance, or of creating an intimidating, hostile, or offensive work or educational environment.

Submission to, or rejection of, the conduct by the individual is used as the basis for any decision affecting the individual regarding benefits and services, honors, programs, or activities available at or through the educational institution.

The definitions above are evaluated using the standard of a reasonable person having the same legally protected characteristics that are the basis for the sexual harassment allegations (sex, gender identity and/or sexual orientation) as the person alleged to be experiencing the conduct.

### **Sexual Assault**

*(Can be Title IX matter or Non-Title IX matter, depending on location and type of conduct.)*

An offense classified as a forcible or non forcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation. This category of prohibited conduct includes the following:

1. **Rape:** The actual or attempted penetration, however slightly, 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 their temporary or permanent mental or physical incapacity. For Non-Title IX matters, (a subset of sexual violence) California law defines rape as "penetration, no matter how slight, of the vagina or anus with any part or object, or oral copulation of a sex organ by another person, without the consent of the victim."
2. **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 their youth or because of their temporary or permanent mental or physical incapacity.
3. **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 their youth or because of their temporary or permanent mental or physical incapacity.
4. **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 their youth or because of their temporary or permanent mental or physical incapacity. For Non-Title IX matters, California law defines Sexual Battery (fondling) as "the intentional touching of another person's intimate parts without consent, intentionally causing a person to touch the intimate parts of another without consent, or using a person's own intimate part to intentionally touch another person's body without consent."
5. **Incest:** Nonforcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
6. **Statutory Rape:** Nonforcible sexual intercourse with a person who is under the statutory age of consent of 18 years old.

### Dating Violence

*(Can be Title IX matter or Non-Title IX matter, depending on location)*

Dating Violence is defined as 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**

*(Can be Title IX matter or Non-Title IX matter, depending on location)*

Domestic Violence is defined as a 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 the domestic or family violence laws of the state of California 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 of the state of California.

## **Stalking**

*(Can be Title IX matter or Non-Title IX matter, depending on location)*

Stalking is defined as 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. For the purposes of this definition, course of conduct means two or more acts, including, but not limited to, acts in which the Respondent directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property. Reasonable person means a reasonable person under similar circumstances and with similar identities to the Complainant. Substantial emotional distress means significant mental suffering or anguish that may but does not necessarily require medical or other professional treatment or counseling.

## Sexual Exploitation (Not Prohibited by Title IX)

Sexual Exploitation is taking non-consensual or abusive sexual advantage of another for their own benefit or for the benefit of anyone other than the person being exploited. Examples of Sexual Exploitation include, but are not limited to:

1. Sexual voyeurism (such as observing or allowing others to observe a person undressing or using the bathroom or engaging in sexual acts) or the viewing of another person's sexual activity or intimate parts, in a place where that other person would have a reasonable expectation of privacy, without that person's consent, for the purpose of arousing or gratifying sexual desire.
2. The recording of or the taking of pictures, video, or audio recording of another in a sexual act, or in any other sexually-related activity when there is a reasonable expectation of privacy during the activity, without the consent of all involved in the activity, or exceeding the boundaries of consent (such as allowing another person to hide in a closet and observe sexual activity), including the making or posting of revenge pornography.
3. The distribution of images, including video or photograph, or audio of another person's sexual activity or intimate parts, if the individual distributing the images or audio knows or should have known that the person depicted in the images or audio did not consent to the disclosure.
4. Prostituting another person.
5. Engaging in sexual activity with another person while knowingly infected with human immunodeficiency virus (HIV) or a sexually-transmitted disease (STD) or infection (STI), without informing the other person of the infection.
6. Causing or attempting to cause the incapacitation of another person (through alcohol, drugs, or any other means) for the purpose of compromising that person's ability to give consent to sexual activity, or for the purpose of making that person vulnerable to non-consensual sexual activity.
7. Misappropriation of another person's identity on apps, websites, or other venues designed for dating or sexual connections.
8. Forcing a person to take an action against that person's will by threatening to show, post, or share information, video, audio, or an image that depicts the person's nudity or sexual activity.

9. The trafficking of another person, defined as the inducement of a person to perform a commercial sex act, or labor or services, through force, fraud, or coercion.

## **Other Forms of Prohibited Sexual Misconduct**

### **Sex Discrimination (Not Included in Sexual Misconduct)**

Sex Discrimination occurs when an individual is subject to an adverse action based upon that individual's sex. An adverse action means an action that has a substantial and material adverse effect on the individual's ability to participate in a University program or activity. Minor or trivial actions or conduct not reasonably likely to do more than anger or upset an individual does not constitute an adverse action. Allegations of sex discrimination are not generally processed under this Policy.

### **FEHA Sexual Harassment (Not Included in Sexual Misconduct)**

The California Fair Employment and Housing Act ("FEHA") also prohibits sexual harassment of employees by employees or third parties with whom the University's employees have contact through their employment, including applicants, students, student-employees, interns, volunteers, and independent contractors. This definition is broader than Title IX Sexual Harassment and Non-Title IX Sexual Harassment. FEHA Sexual Harassment (Hostile Work Environment) is defined as any unwelcome behavior based on sex that is reasonably regarded as offensive that:

1. Sufficiently offends, humiliates, distresses, or intrudes upon its victim, so as to disrupt the victim's emotional tranquility in the workplace, or
2. Affects the victim's ability to perform the job as usual, or
3. Otherwise interferes with and undermines the victim's personal sense of well-being.

The definition of FEHA Sexual Harassment includes unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when submission to such conduct:

Is made a condition of employment or employment decision (Quid Pro Quo); or  
Meets the definition of harassment as stated above (Hostile Work Environment).

Examples of conduct that may constitute prohibited FEHA Sexual Harassment may include but are not limited to:

- Unwanted physical touching;
- Telling sexually explicit jokes or stories;
- Making comments or gestures reasonably regarded as lewd or offensive;
- Displaying sexually suggestive objects, cartoons, or pictures;
- Sending sexually explicit messages by letter, notes, electronic mail, social media posting, or telephone;
- Making unwelcome comments reasonably regarded as offensive about a person's body, physical appearance, or clothing;
- Frequent use of unwelcome terms of endearment; or
- Repeatedly asking an individual for a date or meetings outside of working hours after they have indicated an unwillingness to go.

A single incident of harassing conduct may create a hostile work environment under FEHA Sexual Harassment if the harassing conduct has unreasonably interfered with the victim's work performance or created an intimidating, hostile, or offensive work environment.

Whether or not the person meant to give offense or believed their comments or conduct were welcome is not significant. Rather, the policy is violated when other individuals, whether recipients or mere observers, are actually offended by comments or conduct based on any protected category and the conduct is considered offensive by a reasonable person.

An employee may file a formal complaint of FEHA Sexual Harassment through the [Employee Grievance Procedure](#) in Section 31 of the University Policy Manual.

## Appendix B: Other Policy Definitions

### Advisor

Advisor refers to a person chosen by a party or appointed by the University to accompany the party to meetings related to the formal investigation and hearing process or the informal resolution process, to advise the party, and, in Title IX cases, to conduct cross-examination when required for the party at the hearing, if any.

### Affirmative Consent

Consent as used in the definition of Sexual Assault above means “Affirmative Consent.”

Affirmative Consent means informed, conscious, voluntary, and mutual agreement to engage in sexual activity. It is the responsibility of each person involved in the sexual activity to ensure that they have the Affirmative Consent of the other or others to engage in sexual activity. Lack of protest or resistance does not mean Affirmative Consent, nor does silence mean Affirmative Consent. Affirmative Consent must be ongoing throughout a sexual activity and can be revoked at any time. The existence of a dating relationship between the persons involved, or the fact of past sexual relations between them, should never by itself be assumed to be an indicator of Affirmative Consent.

In evaluating whether Affirmative Consent has been freely sought and given, the University will consider the presence of any force, threat of force, or coercion; whether the Complainant had the capacity to give Affirmative Consent; and, whether the communication (through words and/or actions) between the parties would be interpreted by a reasonable person (under similar circumstances and with similar identities) as a willingness to engage in a particular sexual act. Affirmative Consent cannot be obtained through physical force or where there is a reasonable belief of the threat of physical force, when one person overcomes the physical limitations of another person, or by taking advantage of another person’s incapacitation.

An individual is also unable to provide consent to engage in sexual activity when the individual:

- 1) is a minor (age 17 or under);
- 2) has a mental disorder or developmental or physical disability

that renders her or him incapable of giving knowing consent; 3) is asleep or unconscious; or 4) is incapacitated from alcohol or other drugs, and this condition was known, or reasonably should have been known or recognized by the Respondent.

### **Appeal Officer**

Appeal Officer refers to the person designated by the University to review appeals of a dismissal of the formal complaint or any allegations therein, or the determination of responsibility.

### **Complainant**

Complainant refers to an individual who is reported to have experienced Sexual Misconduct, regardless of whether the individual makes a formal complaint.

### **Employee**

Employee refers to a University faculty or staff member, including full-time, nine to twelve month, part-time, regular, tenured, restricted, probationary, and temporary positions.

### **Hearing Officer**

Hearing Officer refers to the person designated by the University to conduct a hearing with both parties before making a determination of responsibility on the allegations of sexual misconduct.

### **Incapacitation**

Incapacitation is the inability, temporarily or permanently, to give consent because the individual is mentally and/or physically helpless, either voluntarily or involuntarily, or the individual is unconscious, asleep, or otherwise unaware that the sexual activity is occurring. In addition, an individual is incapacitated if they demonstrate that they are unaware at the time of the incident of where they are, how they got there, or why or how they became engaged in a sexual interaction.



When alcohol is involved, incapacitation is a state beyond drunkenness or intoxication. When drug use is involved, incapacitation is a state beyond being under the influence or impaired by use of the drug. Alcohol and other drugs impact each individual differently, and determining whether an individual is incapacitated requires an individualized determination.

Some of the factors used to determine incapacitation include:

- Stumbling or otherwise exhibited loss of equilibrium
- Bloodshot, glassy or unfocused eyes
- Slurred speech or word confusion
- Vomiting, especially repeatedly
- Outrageous or unusual behavior
- Being disoriented, or confused as to time, place, etc.
- Loss of consciousness

None of these factors, except for the last, may constitute—in and of themselves—Incapacitation. But, the process of finding someone responsible for a violation of the Policy related to incapacity involves careful examination of all evidence, amounting to a sufficient or insufficient meeting of the preponderance of the evidence standard. This standard may be met with some combination of factors.

Some counter-indicators of incapacity may include:

- Stops to do things to prepare for sexual activity
- Stops to use or request birth control
- Brushes teeth after vomiting
- Goes to restroom
- Carefully removes clothes
- Carries on relatively normal conversations
- Motor abilities are not impaired

The use of alcohol or other drugs can lower inhibitions and create an atmosphere of confusion about whether consent is effectively sought and freely given. If there is any doubt as to the level or extent of one's own or the other individual's intoxication or Incapacitation, the safest

course of action is to forgo or cease any sexual activity. A Respondent's voluntary intoxication is never an excuse for or a defense to prohibited conduct, and it does not diminish the responsibility to determine that the other person has given consent.

In evaluating consent in cases of reported Incapacitation due to alcohol or other drugs, the University considers all of the above factors in determining two issues:

1. Is there a preponderance of evidence that the Complainant was Incapacitated?
2. Did the Respondent know that the Complainant was Incapacitated? And if not, should a sober, reasonable person in a similar set of circumstances as the Respondent have known that the Complainant was Incapacitated?

If the answer to both of these questions is "yes," there was no consent; and the conduct is a violation of this Policy.

## **Parties**

Parties include the Complainant(s) and Respondent(s), collectively.

## **Respondent**

Respondent refers to an individual who is reported to have engaged in Sexual Misconduct.

## **Retaliation**

"Retaliation" is taking an adverse action (as described in the definition of Sex Discrimination above), which may include intimidating, threatening, coercing, harassing, or discriminating against any individual for the purpose of interfering with any right or privilege secured by law or by this Policy, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under this Policy. Retaliation may be committed by the Respondent, the Complainant, or any other individual or group of individuals. Acts of alleged Retaliation should be reported immediately to the [University Title IX Coordinator](#); the report will be promptly investigated. The University reserves the right to handle retaliation under this Policy or another University policy.

### **Standard of Evidence**

Determinations on whether the Sexual Misconduct Policy was violated will be made based on the preponderance of the evidence standard (whether it is more likely than not that the Respondent violated the Sexual Misconduct Policy).

### **Student**

Student refers to a University student, including an applicant for admission; any matriculated undergraduate or graduate student who is enrolled in course work; has completed the immediately preceding term, is not presently enrolled, and is eligible for re-enrollment; is on an approved educational leave or other approved leave status; is currently serving a suspension, expulsion, or interim restriction; or is awaiting a degree. This includes the period before classes begin, while the student is attending classes, between academic sessions or on leave. This Policy applies even if the student withdraws from school while a disciplinary matter is pending.

### **Third Party**

Third Party refers to an individual who is not a University student or employee (e.g., independent contractors, vendors, volunteers, alumni/ae, or visitors).

### **Witness**

Witness refers to an individual who may have information relevant to a report of Sexual Misconduct. A Witness may be a student, an employee, or a third party.

## **Appendix C: Emergency Removal and Timely Warning Obligations**

### **Emergency Removal**

The University can remove a student Respondent on an emergency basis when an individualized safety and risk analysis has determined that an immediate threat to the physical health or safety of any student or other individual justifies removal. This risk analysis is performed by the vice president for student affairs (or designee), who may consult as necessary with other University officials to conduct an objective threat assessment. The emergency removal may be a full restriction from all University property, programs and activities or a limited removal (e.g., from certain locations, classes, teams, organizations, or activities). The vice president for student affairs has sole discretion under this Policy to implement or stay an emergency removal and to determine the conditions and duration. Violation of an emergency removal under this Policy will be grounds for discipline, which may include permanent dismissal.

When it is determined that an emergency removal is justified, the student Respondent will be given written notice, which will include the basis for the removal decision and the specific restrictions, conditions, and duration. Immediately after the emergency removal, the student Respondent will be given the opportunity to challenge the decision by submitting in writing why the removal should not be implemented or should be modified to the Office of the Provost by emailing [provost@pepperdine.edu](mailto:provost@pepperdine.edu) within 72 hours of the emergency removal. The emergency removal does not replace the regular investigation and hearing process, which will proceed as set forth in this Policy, up to and through the conclusion of any appeal, if required.

Employee Respondents may be placed on paid administrative leave by Human Resources while the formal grievance process described below is pending. Human Resources' decision to do so is final and is not subject to review.

### **Timely Warning Obligations**

Parties reporting Sexual Assault, Domestic Violence, Dating Violence, and/or Stalking should be aware that under the Clery Act, the University must issue timely warnings for incidents reported to the University that pose a serious or continuing threat of bodily harm or danger to members of the campus community. The University will ensure that a Complainant's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the potential danger.

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## **Appendix D: Promptness, Time Frames, and Time Limits**

### **Promptness and Time Frames**

All allegations of Sexual Misconduct are acted upon promptly by the University after it has received notice or a formal complaint. Formal complaints can take up to 160 business days to resolve; typically they are resolved earlier. The 160 business-day time frame includes the date a formal complaint is filed to the date of its final resolution. This period includes the [formal grievance process](#) (including the investigation, hearing, and appeal) and the [informal resolution process](#) if utilized by the parties. The investigation is normally completed within 90 business days. The hearing process normally takes 15 business days when the Respondent is a student. When the Respondent is an employee, the hearing process normally takes 30 business days because of the additional time needed for the supervisor or faculty body to review any recommended sanctions by the hearing decision maker(s). If the hearing decision is appealed by either party, this process normally takes 20 business days. If an informal resolution process is used, this process normally takes 60 business days.

There are exceptions and extenuating circumstances that can cause a resolution to take longer, but the University will avoid all undue delays within its control. If the time frames for

resolution outlined in the University's procedures will be delayed, the University Title IX Coordinator will provide written notice to the parties of the delay, the cause of the delay, and an estimate of the anticipated additional time that will be needed as a result of the delay.

### **Time Limits on Reporting**

There is no time limitation on reporting Sexual Misconduct or making a formal complaint to the University Title IX Coordinator. However, if the Respondent is no longer subject to the University's jurisdiction and/or significant time has passed, the ability to investigate, respond, and provide remedies may be more limited or impossible. Acting on reports/formal complaints significantly impacted by the passage of time (including, but not limited to, the revision of policy) is at the discretion of the University Title IX Coordinator, who may document allegations for future reference, offer supportive measures and/or remedies, and/or engage in informal or formal action, as appropriate. When the report or formal complaint is affected by a significant time delay, the University will typically apply the policy (e.g., definitions) in place at the time of the alleged misconduct and the procedures (e.g., grievance process) in place at the time of the report or formal complaint.

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## **Appendix E: Third Party Respondents and Reporters**

If the Respondent is a Third Party (an individual who is not a University student or employee such as visitors, volunteers, vendors, independent contractors, or alumni/ae), the University's ability to take action may be limited and is determined by the context of the prohibited conduct and the nature of the relationship of the Third Party to the University. All vendors serving the

University through third-party contracts are subject to the policies and procedures of their employers.

Supportive measures, remedies, and resources may be accessible to the Complainant by contacting the University [Title IX Coordinator](#). The University Title IX Coordinator will determine the appropriate manner of resolution that may include, but is not limited to, conducting an internal investigation that could result in restriction of the Third Party from University campuses or University activities, referral to area law enforcement, and outreach and coordination with the school or affiliation of the Third Party. The University will offer resources and assistance to all community members who experience and/or are affected by the prohibited conduct.

When the Respondent is enrolled in or employed by another institution, the University Title IX Coordinator can assist the Complainant in liaising with the appropriate individual at that institution, as it may be possible to allege violations through that institution's policies. Similarly, the University Title IX Coordinator may be able to advocate for a student or employee Complainant who experiences discrimination in an externship, study abroad program, or other environment external to the University where sexual harassment or nondiscrimination policies and procedures of the facilitating or host organization may give recourse to the Complainant.

Any person, including a Third Party, may report allegations of Sexual Misconduct by a University student or employee to the University Title IX Coordinator, and the University will take appropriate action. However, a Third Party is not permitted to file a formal complaint unless they are attempting to participate in a University education program or activity (e.g., where the Complainant has graduated from one University program but intends to apply to a different program, or where the graduated Complainant intends to remain involved with the University's alumni programs and activities).

## Appendix F: Formal Grievance Process Against a University Policy or Practice

A student may file a formal complaint against the University alleging that a University policy or practice constitutes Sex Discrimination using the school's [Non-Academic Student Grievance Procedure](#). An employee may file a formal complaint of Sex Discrimination against the University through the [Employee Grievance Procedure](#) in Section 31 of the University Policy Manual.

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## Appendix G: Confidential Resources and Privacy

The University has designated confidential resources who are not obligated to report information that is provided to them. This allows individuals to explore their options in a supportive environment while they make informed decisions. Confidential resources for students at the University include the counselors at the University's Counseling Center located at the Student Assistance Center ([310-506-4210](tel:310-506-4210)) and the Athletics Chaplain, Jordan Holm at [jordan.holm@pepperdine.edu](mailto:jordan.holm@pepperdine.edu). These confidential resources will not share these communications or that these communications occurred without consent from the Complainant. There are rare exceptions where confidentiality cannot be honored; for example, in cases of court subpoena, child or elder abuse, or where harm to self or others is probable.

Employees who are involved in Sexual Misconduct matters, may seek confidential support from the Employee Assistance Program through Health Advocate at [866-799-2728](tel:866-799-2728) and the University Chaplain, Sara Barton at [sara.barton@pepperdine.edu](mailto:sara.barton@pepperdine.edu). An individual who is not



prepared to make a report or formal complaint, or who may be unsure how to label what happened, but still seeks information and support, is strongly encouraged to contact a confidential resource.

When a disclosure is made to the University Title IX Coordinator, the University will keep confidential the identity of any individual who has made a disclosure, including any Complainant, Respondent, or Witness, except as may be permitted by the Family Educational Rights and Privacy Act (FERPA), or as required by law, or to carry out the procedures in this Policy. This means that the University will protect the individual's privacy but may disclose information to those who have a legitimate need to know.

In accordance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, the University will conduct record-keeping on reports of dating violence, domestic violence, stalking, and sexual assault, which excludes personally-identifiable information. Confidential resources will not report Clery crimes they learn about through confidential communications for purposes of the University's compilation of campus crime statistics.

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## **Appendix H: Role of Advisors**

Involved parties may be assisted by an Advisor of their choice at pre-hearing meetings (e.g., meetings with the University Title IX Coordinator or the investigator), at hearing and appeal meetings, and at informal resolution meetings. The Advisor cannot speak for the parties. The role of the Advisor is to accompany the parties and advise them privately during the pre-hearing, hearing, and informal resolution processes. Unless otherwise indicated in this

Policy, the University will only communicate with the parties. The parties are responsible for communicating with their own Advisors.

The only exception is at Title IX hearings where the Advisor of each party is required by the Title IX regulations to relay the party's cross-examination questions to the other party and Witnesses (after each cross-examination question has been screened for relevance by the hearing chair) so that a party never personally conducts cross-examination. See [Hearing Procedures](#) for additional information.

Choosing an Advisor who is also a Witness in the hearing process creates potential for bias and conflict-of-interest. A party who chooses an Advisor who is also a Witness can anticipate that issues of potential bias will be explored by the hearing decision maker(s).

The University expects Advisors to adjust their schedules to allow them to attend University meetings when planned, but may change scheduled meetings to accommodate an Advisor's inability to attend, if doing so does not cause an unreasonable delay. A party may elect to change Advisors during the process and is not obligated to use the same Advisor throughout. The parties are expected to inform the investigator(s) of the identity of their Advisor at least two (2) business days before the date of their first meeting with investigators (or as soon as possible if a more expeditious meeting is necessary or desired). The parties are expected to provide timely notice to the University Title IX Coordinator if they change Advisors at any time. Parties are expected to inform the University Title IX Coordinator of the identity of their hearing Advisor at least two (2) business days before the hearing.

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## **Appendix I: Sanctions**

Violation of the Sexual Misconduct Policy may result in the imposition of one or more of the sanctions listed below. Sanctions may be imposed in both the informal resolution process (if both parties agree) and the formal grievance process, and are not limited to those listed. Failure to comply with the sanction(s) imposed in the letter of determination may result in further disciplinary action, including but not limited to, a registration hold, placement on, or extension of, University probation, suspension, or permanent dismissal.

Sanctions are based on general principles of fair treatment. While attempting to be consistent in its disciplinary decisions, the University also seeks to be fair and sensitive to the facts and circumstances of each individual case.

**Warning:** Oral or written notice to the student or employee that the student or employee is violating or has violated the Sexual Misconduct Policy and that continuation or repetition of misconduct may result in a more severe sanction.

**University Probation:** A status which indicates that a student's relationship with the University is tenuous. Probation is for a designated period of time and includes the probability of more severe disciplinary sanctions if the student is found in violation of any other policy. Probation may also result in the loss of privileges, depending on the policies of various University departments and organizations. For example, a student becomes ineligible to hold some leadership positions when placed on probation. Also, if a student is placed on University probation, the student becomes ineligible for future International Programs during the probation period. Ineligibility includes applying, remaining in the queue, or attending a program.

**Loss of Privileges:** Such loss may include, but is not limited to, financial assistance, eligibility to represent the University officially on athletic teams or performing groups, or use of specific University facilities, computer systems, equipment, or services.

**Restitution:** Compensation for loss, damage or injury. Failure to pay such charges may result in additional sanctions (including, but not limited to, denial of re-enrollment or refusal to release official transcripts and records).

**Educational Sanctions:** Reading/writing assignment, drug or alcohol assessment/treatment, seminar attendance, or other discretionary sanctions as deemed appropriate.

**Dismissal from University Housing:** Loss of privilege to live in University housing.

*In accordance with University housing policy, students required to live on campus who are dismissed from University housing may be dismissed from the University. Any student dismissed from University housing prior to the end of the contractual period may be responsible for any remaining monetary charges, as well as ineligible for reimbursement for any charges already paid.*

**Suspension:** Temporary separation of the student or employee from the University for a definite period of time. Students are eligible to return without reapplying through the office of admissions, unless the student is absent for two or more academic years, which does require re-application and readmission by the office of admission, as is the case for all students. Readmission is not guaranteed and conditions for readmission may be specified.

**Memoranda to Personnel File:** Employees may receive a memorandum to file or a Performance Improvement Plan.

**Expulsion:** Temporary separation of the student from the University for a definite period of time, but not less than two semesters, after which the student must re-apply through the office of admission and be granted acceptance before becoming eligible for re-enrollment at the University. Conditions for readmission may be specified, but the student is not guaranteed readmission.

**Dismissal:** Permanent separation of the student or employee from the University. A student who is dismissed from the University is permanently ineligible to re-enroll at the University at any time in the future. When students are dismissed, expelled, or suspended for disciplinary reasons, there will be no refund of tuition or room charges for the semester and all financial assistance for subsequent semesters will be reviewed and is subject to cancellation. This sanction will be noted permanently as a “Disciplinary Dismissal” on the student’s official transcript. University dismissal will be made part of the permanent disciplinary record.

**Revocation of Admission and/or Degree:** Admission to, or a degree awarded from the University, may be revoked for any violation of University policy committed by a student prior to matriculation at, or graduation from, the University.

If a violation occurs just prior to a student’s scheduled graduation, sanctions may be imposed even if all academic requirements are completed. Sanctions may include, but are not limited to, community service, research or reflective paper, restitution, loss of privilege to participate in

the graduation ceremony, deferment of degree, and a transcript hold. The University may withhold issuing a degree until all sanctions are fulfilled. In the case of a serious violation, the University may permanently withhold or revoke a degree.

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## **Appendix J: Immunity, False Allegations and Evidence, and Counterclaims**

### **Immunity for Complainants and Witnesses**

In order to encourage student Complainants and Witnesses to make reports of conduct prohibited under this Policy, the University will not pursue disciplinary action against a student who makes a good faith report to the University as a Complainant or a Witness of conduct prohibited under this Policy for a violation of the Student Code of Conduct by the student occurring at or near the time of the incident, regardless of the location at which the incident occurred or the outcome of the investigation. This includes immunity for disclosure of personal consumption of alcohol or other drugs (underage or illegal) which would otherwise be a violation of the Student Code of Conduct. Even when immunity is extended, the University may initiate an assessment or educational discussion or pursue other non-disciplinary options regarding alcohol or other drug use.

### **False Allegations and Evidence**

Deliberately false and/or malicious accusations under this Policy, as opposed to allegations which, even if erroneous, are made in good faith, are a serious offense and will be subject to appropriate disciplinary action. Additionally, Witnesses and parties knowingly providing false evidence, tampering with or destroying evidence after being directed to preserve such

evidence, or deliberately misleading an official conducting an investigation can be subject to disciplinary action.

## **Counterclaims**

The University is obligated to ensure that the grievance process is not abused for retaliatory purposes. The University permits the filing of counterclaims but will assess whether the allegations in the counterclaim are made in good faith. Counterclaims by the Respondent may be made in good faith, but are, on occasion, also made for purposes of retaliation. Counterclaims made with retaliatory intent will not be permitted.

Counterclaims determined to have been reported in good faith will be processed using the formal grievance procedures. Investigation of such claims may take place after resolution of the underlying initial allegation, in which case a delay may occur. Counterclaims may also be resolved through the same investigation as the underlying allegation, at the discretion of the University Title IX Coordinator. When counterclaims are not made in good faith, they will be considered retaliatory and may constitute a violation of this Policy.

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## **Appendix K: Withdrawal or Resignation While Allegations Are Pending**

### **Students**

If a student has an allegation pending for violation of this Policy, the University may place a hold on a student's ability to graduate and/or to receive an official transcript/diploma.

If a student decides not to participate in the resolution process, the process proceeds absent their participation to a reasonable resolution. The University will continue to address and remedy any systemic issues, variables that may have contributed to the alleged violation(s), and any ongoing effects of the alleged Sexual Misconduct and/or Retaliation. The student who withdraws or leaves while the process is pending may not return to the University. Such exclusion applies to all schools and campuses of the University. A hold will be placed on their ability to be readmitted. They may also be barred from University property and/or events.

If the student Respondent only withdraws or takes a leave for a specified period of time (e.g., one semester or term), the resolution process may continue remotely and that student is not permitted to return to University until the process is completed and all sanctions (if any) have been satisfied.

During the resolution process, the University may put a hold on a responding student's transcript or place a notation on a responding student's transcript or disciplinary record that a disciplinary matter is pending.

## **Employees**

Should an employee Respondent resign with unresolved allegations pending, the resolution process ends, as the University no longer has disciplinary jurisdiction over the resigned employee. However, the University will continue to address and remedy any systemic issues, variables that contributed to the alleged violation(s), and any ongoing effects of the alleged harassment or discrimination. The former employee may also be barred from University property and/or events.

## Appendix L: Retention of Records

The University will maintain for a period of seven years records of:

Each Sexual Misconduct investigation including any determination regarding responsibility and any transcript required under federal regulation;

Any remedies provided to the Complainant designed to restore or preserve equal access to the University's education program or activity;

Any appeal and the result;

Any informal resolution and the result;

All materials used to train Title IX coordinators, investigators, decision makers, and any person who facilitates an informal resolution process;

Any actions, including any supportive measures, taken in response to a report or formal complaint of Sexual Misconduct, including:

The basis for all conclusions that the response was not deliberately indifferent;

Any measures designed to restore or preserve equal access to the University's education programs or activities; and

If no supportive measures were provided to the Complainant, document the reasons why such a response was not clearly unreasonable in light of the known circumstances.

The University will maintain for a period of seven years records of any disciplinary sanctions imposed on the Respondent except for University dismissal or a permanent withholding of a degree, which will be made part of the permanent disciplinary record.

The University will also maintain any and all records in accordance with state and federal laws.



## Appendix M: Required Trainings

The University Title IX Coordinator, investigators, decision-makers, and any person who facilitates an informal resolution process will receive training on the definitions of [Sexual Misconduct](#) under this policy, the scope of the University's education program or activity, how to conduct an investigation and grievance process including hearings, appeals, and informal resolution processes, as applicable, and how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. These individuals will receive annual training on the issues related to domestic violence, dating violence, sexual assault, and stalking and how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability.

Investigators will receive training on issues of relevance to create an investigation report that fairly summarizes relevant evidence. Decision-makers will receive training 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 relevant.

Any materials used to train the University Title IX Coordinator, investigators, decision-makers, and any person who facilitates an informal resolution process, will not rely on sex stereotypes and will promote impartial investigations and adjudications of Formal Complaints of Sexual Misconduct.

The University will make these training materials publicly available on the University's website at [www.pepperdine.edu/titleix](http://www.pepperdine.edu/titleix).

### SEXUAL MISCONDUCT AWARENESS AND PREVENTION PROGRAMS

In an effort to reduce the risk of sexual misconduct occurring among its students and its employees, the University provides primary prevention programs, prevention awareness programs, and ongoing prevention and awareness campaigns, including training on bystander intervention, that are targeted to result in the risk reduction of sexual misconduct.

Primary Prevention Programs: Programming, initiatives, and strategies informed by research for assessed value, effectiveness, or outcome that are intended to stop sexual misconduct before they

occur through the promotion of positive and healthy behaviors that foster healthy, mutually respectful relationships and sexuality, encourage safe bystander intervention, and seek to change behavior and social norms in healthy and safe directions.

**Awareness Programs:** Community-wide or audience-specific programming, initiatives, and strategies that increase audience knowledge and share information and resources to prevent violence, promote safety, and reduce perpetration. Programs provided to incoming students and new employees on sexual misconduct that educate new students and employees that sexual misconduct is prohibited, that such conduct is prohibited under California criminal law, the definition of “consent” in California relating to sexual activity, bystander intervention, information on risk reduction, and information on the University’s policies and procedures if sexual misconduct occurs.

**Ongoing Prevention and Awareness Campaigns:** Programing, initiatives, and strategies that are sustained over time and focus on increasing understanding of topics relevant to and skills for addressing sexual misconduct. Using a range of strategies with audiences throughout the institution.

The University’s prevention and awareness programs and campaigns are conducted at new student and employee orientations. The University also periodically communicates such programs and campaigns to its employees and students via emails, web based trainings, and presentations to specific departments, organizations and student groups.

**Bystander Intervention:** Safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of sexual misconduct. Bystander intervention includes recognizing situations of potential harm, understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking action to intervene. The University includes bystander intervention training during its prevention and awareness programs. The University has also created the Step Up! campaign to provide members of the Pepperdine community the knowledge and tools necessary to intervene during problematic situations involving alcohol abuse, anger, depression, discrimination, disordered eating, gambling, hazing, relationship abuse, and sexual assault. Individuals can learn about the Step Up! approach by attending training workshops or by scheduling a presentation for their department or organization. More information concerning this campaign can be found at: <http://community.pepperdine.edu/stepup/>.

**Risk Reduction:** Options designed to decrease perpetration and bystander inaction and increase empowerment for victims to promote safety and help individuals and communities address conditions that facilitate violence. These outreach efforts for students are coordinated through the Counseling Center. For information, call 506-4210 or visit: <https://community.pepperdine.edu/counselingcenter/sexualassaultresources/>. This site also includes additional resources and frequently asked questions about sexual misconduct. These outreach efforts for employees are coordinated through Human Resources. For information, call (310) 506-4397 or visit: <http://www.pepperdine.edu/hr/>.

## DISCLOSURES TO ALLEGED VICTIMS OF CRIMES OF VIOLENCE OR NON-FORCIBLE SEX OFFENSES

The University will, upon written request, disclose to the alleged victim of a crime of violence, or a non-forcible sex offense, the results of any disciplinary hearing conducted by the college against the student who is the alleged perpetrator of the crime or offense. If the alleged victim is deceased as a result of the crime or offense, the University will provide the results of the disciplinary hearing to the victim's next of kin, if so requested.

## INFORMATION REGARDING SEX OFFENDERS

Information from law enforcement agencies concerning registered sex offenders may be obtained through the Department of Public Safety's website link:

<https://www.pepperdine.edu/publicsafety/department/safety/>

## EMERGENCY RESPONSE AND EVACUATION PROCEDURES

An Emergency Preparedness Guide is distributed to all faculty, staff and students electronically. It is also available for printable download on the University's Community Wavenet login. The document provides emergency information for the following:

1. Emergency Phone Numbers
2. Serious Injury
3. Crimes in Progress/Active Shooter
4. Earthquake
5. Evacuation of Persons with Disabilities
6. Fire
7. Chemical Spills/Fires
8. Bomb Threat and Checklist
9. Power Outage
10. Flooding and Water Damage
11. Severe Winds
12. Evacuation Routes/Staging Areas
13. Various other workplace/school, and home emergency topics

The Office of Insurance & Risk (OIR) maintains an emergency information web page containing any relevant emergency instructions and best practices at: <http://emergency.pepperdine.edu/>. In addition to the resources on the OIR website listed above, the Department of Public Safety website provides information regarding the procedures to be followed in the event of an emergency at: <http://www.pepperdine.edu/publicsafety/safety/emergencypreparedness.htm>. Information regarding emergency, evacuation and relocation procedures are also located in individual handbooks and/or catalogs.

Maps depicting evacuation-staging locations are posted and/or distributed to the campus community. Annual evacuation drills are conducted for each academic building and student residential buildings.

## MISSING STUDENT NOTIFICATION

Pepperdine University takes student safety very seriously. To this end, the following policy has been established concerning students who live in University- owned campus housing who, based on the

facts and circumstances known at the time to University officials, are presumed to be missing. A student will be considered missing if a roommate, classmate, faculty member, friend, family member or other campus person has not seen or heard from the person in a reasonable amount of time. In general, a reasonable amount of time is 24-hours but may vary with the time of day and information available regarding the missing person's daily schedule, habits, and reliability. Individuals will also be considered missing immediately, if their absence has occurred under circumstances that are suspicious or cause concerns for their safety. Report any missing student to the Department of Public Safety.

**Purpose-** This policy establishes University standards and procedures for notifying law enforcement, parents or guardians, and student-identified contacts when a student who resides in University housing is reported as missing or has been determined to be missing. This policy applies to students who reside in campus housing, including off-campus apartment units leased by the University for student residents. This policy applies to "missing persons" and is distinct from policies related to "welfare checks."

Prior to occupying University housing, students will be informed of the following: 1) the University will notify the Department Public Safety if a student is reported missing, 2) students may identify a person to be contacted by the University no later than 24- hours after the time that the student is determined missing in accordance with the official notification procedures, 3) the University is required to immediately notify the custodial parent or guardian if a student, who is under 18 years of age and not an emancipated individual, is determined to be missing, and 5) the University is required to notify law enforcement no later than 24 hours after the time that the student is determined to be missing.

**Confidential Contacts-** Prior to occupying University housing, students will be given the opportunity to designate an individual or individuals to be contacted by the University in the event that the student is determined to be missing (per the policy). A designation will remain in effect until changed or revoked by the student. Only authorized campus officials and law enforcement officers in furtherance of a missing person's investigation will have access to the confidential contact information and it will not be disclosed to others.

## Appendix 1 Campus Security Authorities

<b>DEPARTMENT</b>	<b>NAME</b>	<b>TITLE</b>
<b>UNIVERSITY DEANS</b>		
	<b>ADMINISTRATION</b>	
	Jim Gash	President
	Danny DeWalt	Vice President and Chief of Staff
	Jay Brewster	Provost
	Deborah Crown	Dean - Pepperdine Graziadio Business School
	Michael Williams	Associate Dean of Academic Affairs - PGBS
	Prof. Bernice Ledbetter	Dean of Students and Alumni Affairs - PGBS
	Prof. Paul Caron	Dean - Pepperdine Caruso School of Law
	Jason Jarvis	Associate Dean of Academic Affairs - CSOL
	Chalak Richards	Dean of Student, Diversity, and Belonging - CSOL
	Arnold Barba	Assistant Dean for Professional Formation and Chief of Staff - CSOL
	Pete Peterson	Dean - Pepperdine School of Public Policy
	Sheryl Covey	Assistant Dean for Administration - SPP
	Lee Kats	Interim Dean - Seaver College
	Kendra S. Killpatrick	Senior Associate Dean - Seaver College
	Farzin Majidi	Dean - Pepperdine School of Education & Psychology
	Robert deMayo	Associate Dean, Psychology Division - GSEP
	Anthony Collatos	Associate Dean, Education Division - GSEP
	Michael Feltner	Dean - Pepperdine College of Health Science
<b>SATELLITE CAMPUSES</b>		
	<b>CALABASAS</b>	
	Maya Nutley	Lead Campus Coordinator
	Shizue Kleinman	Campus Coordinator
	Angie Estibillo	Senior Academic Advisor - PGBS
	Moises Olavarrieta	Academic Advisor - GSEP
	Christopher Walther	Academic Advisor - GSEP
	<b>IRVINE</b>	
	Greyson Orellana	Associate Director of Human Resources
	Adam Carnes	Irvine Campus Real Estate Operations Manager

	Leanna Garcia	Lead Human Resources Campus Coordinator
	Elvia Perez	Campus Coordinator
	Elia Lopez	Campus Coordinator
	<b>WEST LA</b>	
	Chaundra Pierce	West LA Lead Campus Coordinator
	Marco Huerta	West LA Campus Coordinator
	Anna Aguinaga	Weekend Real Estate Operations Campus Coordinator
	(Multiple)	Deans & Associate Deans - PGBS, GSEP
	Arman Davtyan	Assistant Dean of Enrollment Management - PGBS
	Michelle Blas	Senior Director, Student Success - GSEP
<b>ATHLETICS</b>		
	<b>ADMINISTRATION</b>	
	Tanner Gardner	Director of Athletics
	Amanda Kurtz	Senior Associate Athletic Director for Operations
	Kevin Wright	Associate Director of Athletics
	Jordan Holm	Assistant Director of Athletics for Academics
	<b>ACADEMIC SUPPORT</b>	
	Erin Carroll	Academic Support Coordinator
	Kendall Boshart	Academic Support Coordinator
	<b>CHEER</b>	
	Daphne Janes	Cheer Coach
	<b>MENTAL HEALTH</b>	
	(Multiple)	Athletics Counselor
	<b>SPORTS MEDICINE</b>	
	Justin Ericson	Director of Sports Medicine
	Nicole Elby	Director of Rehabilitation
	(Multiple)	Assistant Athletic Trainer
	<b>SPORTS PERFORMANCE</b>	
	Matt Young	Assistant Director of Athletics - Strength and Conditioning
	(Multiple)	Assistant Sports Performance Coach
	<b>BASEBALL</b>	
	Rick Hirtensteiner	Head Coach
	Danny Worth	Assistant Coach
	Cameron Rowland	Assistant Coach

	Cole Mahoney-Bruer	Volunteer Assistant Coach
	<b>MEN'S BASKETBALL</b>	
	Tyler LaTorre	Head Coach
	(Multiple)	Assistant Coach
	<b>WOMEN'S BASKETBALL</b>	
	Katie Faulkner	Interim Head Coach
	Olivia Reins	Director of Basketball Operations
	(Multiple)	Assistant Coach
	<b>CROSS COUNTRY/TRACK</b>	
	Lauren Floris	Head Coach
	(Multiple)	Assistant Coach
	<b>MEN'S GOLF</b>	
	Michael Beard	Head Coach
	(Multiple)	Assistant Coach
	<b>WOMEN'S GOLF</b>	
	Laurie Gibbs	Head Coach
	Kacey Dalpes	Assistant Coach
	<b>WOMEN'S SOCCER</b>	
	Tim Ward	Head Coach
	Max Rooke	Associate Head Coach
	Kevin Arellano	Assistant Coach
	Amber Marshall	Assistant Coach
	<b>WOMEN'S SWIMMING &amp; DIVING</b>	
	Ellie Monobe	Head Coach
	Monique Demaisip	Diving Coach
	Dan Marella	Assistant Coach
	<b>MEN'S TENNIS</b>	
	Adam Schaechterle	Head Coach
	Tassilo Schmid	Associate Head Coach
	<b>WOMEN'S TENNIS</b>	
	Per Nilsson	Head Coach
	(Multiple)	Assistant Coach
	<b>MEN'S VOLLEYBALL</b>	
	Jonathan Winder	Head Coach

	(Multiple)	Assistant Coach/Associate Head Coach
	<b>WOMEN'S BEACH VOLLEYBALL</b>	
	Marcio Sicoli	Head Coach
	Noelle Rooke	Assistant Head Coach & Recruiting Coordinator
	Chris Flood	Assistant Coach
	<b>WOMEN'S INDOOR VOLLEYBALL</b>	
	Scott Wong	Head Coach
	(Multiple)	Assistant Coach
	<b>MEN'S WATER POLO</b>	
	Merril Moses	Head Coach
	Terry Schroeder	Associate Head Coach
	(Multiple)	Assistant Coach
<b>HUMAN RESOURCES</b>		
	Sean Michael Phillips	Associate Vice President
	Kyle Stiemsma	Director
<b>INTERNATIONAL PROGRAMS</b>		
	<b>ADMINISTRATION</b>	
	Marc P. Goodman	Vice Chancellor, Hauteville
	Fiona Stewart	Interim Associate Dean
	Ronald "Ron" Cox	Dean of International Programs
	Charles Engelmann	Senior Director of Operations
	Greg Muger	Director of Student Experience
	Rachel Brown	Associate Director of Enrollment & Preparations
	<b>BUENOS AIRES PROGRAM</b>	
	Travis Hill-Weber	Director
	Maria Constanza "Tati" Guerrini	Assistant Director
	Harmony Hill-Weber	Program Assistant
	<b>FLORENCE PROGRAM</b>	
	Elizabeth N. Whatley	Program Director
	Valentina Nocentini	Academic Coordinator
	Giulia Mencargaglia	Program Assistant
	<b>HAUTEVILLE PROGRAM</b>	
	Ezra Plank	Director



	Anais Perez	Coordinator of Student Life
	Rafael Zulian	Program Assistant
	Marc Goodman	Vice Chancellor
	Lorianne Forest	Director of Operations
	<b>HEIDELBERG PROGRAM</b>	
	Melissa Swann	Program Director
	Christina Wuttke	Acting Director
	Eyal Pinkas	Manager of Operations and Student Care
	Martina Drefs	Program Assistant
	<b>LAUSANNE PROGRAM (Closed, Spring 2023)</b>	
	Ezra Plank	Director
	<b>LONDON PROGRAM</b>	
	Heather Pardee	Director
	Karen Haygreen	Assistant Director
	<b>WASHINGTON DC PROGRAM</b>	
	Brian Swarts	Director
	Callie Colvin	Program Manager
<b>PUBLIC SAFETY</b>		
	<b>ADMINISTRATION</b>	
	Meghan Mcguire	Director
	Ariel Sarreal	Assistant Director
	Jason Jensen	Assistant Director of Communications and Fire Captain
	Mark Lauren	Fire Captain, Fire and Life Safety Officer
	<b>OFFICERS AND DISPATCHERS</b>	
	Eduardo Arevalo	Field Supervisor
	Jaime Gladin	Field Supervisor
	Sergio Tuelles	Field Supervisor
	Thomas Fraser	Field Supervisor
	Ysidro Fernandez	Lieutenant
	William Orellana	Investigator
	David Alvarez	Investigator
	(Multiple)	Public Safety Officer
	(Multiple)	Communications Officer

<b>STRAUS INSTITUTE FOR DISPUTE RESOLUTION</b>		
	Sukhsimranjit Singh	Managing Director
	Thomas Stipanowich	Associate Dean
	Shaphan Roberts	Senior Director of Strategic Development
	Sarah Park	Associate Director
	Kristin Lyming	Senior Associate Director of Straus Institute & Graduate Law Programs
	Shellee S. Warnes	Executive Director of Graduate Law Programs and Director of Operations
	Rowoon "Ro" Lee	Assistant Director for Professional Education and Externships
	Stephanie Blondell	Associate Director
<b>STUDENT AFFAIRS</b>		
	<b>ADMINISTRATION</b>	
	Connie Horton	Vice President
	Bradley D. Dudley	Associate Dean of Student Affairs for Planning and Operations
	Terra Hall	Associate Dean of Student Affairs for Diversity and Belonging
	Doug Hurley	Associate Dean of Student Affairs
	La Shonda Coleman	Associate Vice President and University Title IX Coordinator
	Beverly Wright	Executive Assistant to the Vice President for Student Affairs
	<b>STUDENT CARE TEAM, TITLE IX, RISE</b>	
	Dawn Emrich	Director, Title IX Case Management and Prevention Education
	Britney Summerville Brannan	Director, Student Care Team, Case Management
	(Multiple)	Case Manager
	Sergio Gallardo Palma	Associate Director, RISE Program
	Stacey Lee	Director, RISE Program
	<b>CAMPUS RECREATION</b>	
	Robb Bolton	Director
	Julian Baker	Coordinator of Recreational Sports
	Susan Bousman	Administrative Coordinator

	Rebecca Brackett	Group Fitness Instructor
	(Multiple)	Fitness Instructor
	<b>COUNSELING CENTER</b>	
	Nivla Y. Fitzpatrick	Director
	<b>HEALTH CENTER</b>	
	Rebecca Roldan	Director
	<b>INTERCULTURAL AFFAIRS</b>	
	Myron McClure	Director
	Sharon Wakio	Assistant Director
	<b>STUDENT ACTIVITIES</b>	
	Danielle Minke	Director of Student Activities
	Louise Chan	Assistant Director
	Susan Bousman	Administrative Coordinator
	Philip Hong	Student Organizations Coordinator
	Molleigh Pompilio	Fraternity & Sorority Coordinator
	Katherine Price	Campus Programs Coordinator
	<b>HOUSING AND RESIDENCE LIFE</b>	
	Brittany Skinner	Associate Dean
	Philip Cho	Director of Housing Operations
	Maura Page	Director of Residence Life
	(Multiple)	Associate Director
	(Multiple)	Resident Director
	(Multiple)	Graduate Assistant
	<b>STUDENTS: RESIDENT ADVISORS AND SPIRITUAL LIFE ADVISORS (RAS AND SLAS)</b>	
	(Multiple)	