



ANNUAL SECURITY REPORT

October 2018



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Annual Security Report

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I. Introduction

Arizona Summit Law School (ASLS) is committed to providing the following information on required policy disclosure and crime statistics that will be recorded, tabulated, and disseminated to students and employees and made available to outside constituencies. The act is intended to provide current students, potential students, and employees accurate and complete information about safety on campus, so they can make informed decisions. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act requires a post-secondary institution to disclose campus crime statistics and security information.

Arizona Summit Law School Annual Security Report (ASR) is published each year with information with the previous year's incidents and is located on the azsummitlaw.edu website at <https://www.azsummitlaw.edu/gainful-employment-and-aba-required-disclosures.html>

For more information contact:

Arizona Summit Law School
Facilities/Security Director
Two North Central Ave. Suite 1800
Phoenix, AZ 8500448
(602) 682-6841

II. Campus Security and Campus Access

Students, Staff and Faculty

ASLS is committed to providing a safe and secure environment for all faculty, staff, students, and visitors.

For the Fall 2018 term, ASLS is not holding classes at its One North Central, Phoenix, Arizona campus. Students are attending classes as visiting students at other law school locations.

Prior to the Fall 2018 term, the campus at One North Central was open to students and employees Monday – Friday, 6:30am – 12:30am and Saturdays and Sundays from 7:00am – 7:00pm. A valid ASLS ID card was required for entry through the main lobby. An ASLS-issued ID/access card was necessary to gain entry to the building during the week and on holidays, when the building is locked; however, the main building lobby doors and parking garage will remain open 24/7. The parking garage was accessible by an ASLS-issued ID/access card in accordance with ASLS parking policies.

Between the hours of 12:30am to 6:30am Monday – Friday and from 7:00pm to 7:00am on weekends, and all day on any holiday that the school is otherwise closed for business, students still had access, but only to the 11th floor.

Without limitation of any provision herein, violations of this policy are a misuse of Arizona Summit Law School property.

If the ASLS-issued ID/access card became faulty, damaged, or lost, students were instructed to please notify ASLS Facilities and Security management for a replacement.

ASLS does not have campus residences.

The administrative office of ASLS is located at Two North Central, Suite 1800, Phoenix, AZ 85004. The office building is generally open between 7 am – 6 pm during the week and 8 am – 12 noon on Saturdays and staff from ASLS are on-site during the week.

At One North Central, ASLS provided security, seven days per week. From 5:00 am to 1:00am Monday – Friday and 5:00am to 8:00pm on Saturday and Sunday. Security covered the front desk lobby and patrol the campus. Property managers at One North Central provided security daily from midnight to 6:00 am. Their security patrolled the entire building at One North Central, not solely the space occupied by ASLS.

The security guards did not have arresting authority. Security patrolled ASLS controlled areas, the adjacent parking garage, immediate outside premises, check for proper lighting, complete incident reports, escort students and employees to/from their vehicles, asked all ASLS members for proper identification if none is visible, and contacted 9-1-1 in an emergency situation.

At Two North Central, students and employees can contact the Facilities/Security Director at 602-682-6841.

ASLS is not responsible for personal articles on its property.

Visitors/ Vendors

At One North Central, all visitors/ Vendors entered through the lobby and called ASLS security guard at 602-689-9942 to escort them to their designated location.

At Two North Central, all visitors/Vendors should check in with reception and an ASLS administrative personal will be contacted.

Security Awareness and Crime Prevention Programs

Students and employees are informed of ASLS' security procedures and are informed about safety awareness and crime prevention during new student and new employee orientation. Ongoing safety training is also provided, but students and employees are encouraged to be aware of their responsibility for their own security and the security of others, which includes utilized security escorts.

ASLS does not have any officially recognized student organizations with off-campus locations, e.g., fraternities or sororities.

III. How to Report a Crime or Emergency

ASLS does not have campus police, therefore emergency situations should be directed to local law enforcement by dialing **9-1-1**. ASLS contract security may also be contacted for emergencies. They will assist the victim as best they can until law enforcement arrives on scene.

For non-emergency situations, ASLS students and employees are encouraged to report all crimes and public safety related incidents immediately to the ASLS facilities/security management, the Director of Student Services, the Dean or President. Reports will be investigated and recorded in an Incident Report by facilities/security management.

In addition, ASLS encourages anyone who is a witness or victim of a crime to promptly report such activity to police. Because police reports are public records under state law, ASLS cannot hold reports of crime in confidence—violations of the law will be referred to law enforcement agencies. However, confidential tips can be made to law enforcement by calling 480-WITNESS (480-948-6377).

Facilities/Security Director (Joe Perez)	602-682-6841
Office of the Dean (Penny Willrich)	602-682-6833
Director of Student Services (Stacey Pynn)	602-682-6838

IV. Timely Warnings

Arizona Summit Law School Facilities/Security Director is responsible for issuing timely warnings in compliance with the Clery Act. The Clery Act requires Title IV institutions to have and disclose emergency response and evacuation procedures that would be used in response to a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus. Timely warnings will be issued upon confirmation of a significant emergency or dangerous situation occurring on the campus that involves an immediate threat to the health or safety of students or employees. An “immediate threat” includes imminent or impending threat, such as fire, armed intruder, bomb threat, explosion, nearby chemical or hazardous waste spill.

Anyone with information believed to warrant a timely warning should promptly report the circumstances to the Facilities/Security Director Two North Central Ave, Suite 1800, Phoenix AZ 85004. The Facilities/Security Director at Two North Central will consult, as appropriate and necessary, with other school officials regarding whether a timely warning should be issued. The decision to issue a timely warning will be made on a case-by-case basis after consideration of the available facts and verification of a legitimate emergency or dangerous situation exists, including factors such as the nature of the immediate threat and the continuing danger or risk to the campus community. The decision will be made in a manner that is timely (as immediate as possible), that withholds the names of victims as confidential, and that will aid in the prevention of similar crimes.

When a determination is made that a timely warning should be issued, the Facilities/Security Director, or its designee, will take appropriate steps to ensure timely notification to the campus community. Timely warnings primarily will be issued to all students and employees through the school’s Mass notification system (email or building management). Additional options for notification include, but are not necessarily limited to, campus-wide e-mails, physical postings on doors and bulletin boards, or the school’s website. The warnings will include some or all of the following information: the date, time and location of the reported crime; a summary of the incident; a description of the suspect and/or vehicle, if available; and any other special instructions or incident specific safety tips.

Other Crime, Safety and or Security Alerts

Some reported crimes or other incidents that occur either on campus or off campus may not meet the criteria for a timely warning or emergency notification under the Clery Act, but still

have the potential to impact the campus community. Facilities/Security Director, or its designee, will evaluate these situations on a case-by-case basis and, when deemed appropriate under the circumstances, will release crime alerts, safety alerts, or security alerts. The alerts may include physical postings in the impacted area, and/or announcements on the school's website. The alerts typically will contain a concise summary of the reported incident, directions to contact the Facilities/Security Director to provide additional information, and, depending on the circumstances, specific crime prevention, directions, and/or personal security tips recommended by the Facilities/Security Director.

These alerts are not intended to serve as Timely Warning Notifications and therefore the same procedures and criteria used for issuing Timely Warning Notices will not be followed when issuing these alerts.

V. Emergency Notifications

The Facilities/Security Director, or its designee, will immediately 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 employees occurring on the campus. In those instances, the Facilities/Security Director, or its designee, will immediately determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities (including, but not limited to, the Facilities/Security Director, Phoenix Police Department, Phoenix Fire Department, or emergency medical services), compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

Anyone with information believed to warrant immediate notification should promptly report the circumstances to the Facilities/Security Director by phone at (602) 682-6841, or in person at Two North Central Ave, Suite 1800.

Once information constituting an immediate threat is received, the Facilities/Security Director, or designee, in conjunction with other school administrators, local first responders and/or the National Weather Service, is responsible for confirming whether a significant emergency or dangerous situation exists and, if so, which segment or segments of the campus community will receive the notification. The Facilities/Security Director, or designee, will assess each threat on a case-by-case basis and will notify the entire campus community when there is at least the potential that a very large segment of the community will be affected by a situation, or when a situation threatens the operation of the campus as a whole. The Facilities/Security Director, or designee, will continually assess and monitor each situation and may notify additional segments of the campus community if a situation warrants such action. The Facilities/Security Director, or designee, is also responsible for activating the emergency notification procedures by developing the content of the message and initiating the notification. The Facilities/Security Director, or designee, will determine how much information is appropriate to disseminate at

different points in time. The Facilities/Security Director will attempt to contact and advise the President or other senior administrative designee but will not delay notification if they are not immediately available.

The notification of the campus community will be communicated by email, closed-circuit television, and bulletins, which will alert everyone on the appropriate floors. This content will be developed and initiated by the Facilities/Security Director, or designee. The Facilities/Security Director may also collaborate with Information Technology Services to post pertinent information on closed-circuit televisions and electronic marquees throughout campus and the school's website. If any of these systems fail or the school deems it appropriate, in person communication may be used to communicate an emergency. School communications will also coordinate, as appropriate and necessary, with local media to provide current and timely information for campus emergencies to the larger non-ASLS community.

When there is an immediate threat to the health or safety of the students or employees occurring on campus, Arizona Summit Law School will provide appropriate follow-up information regarding the incident using the school's notification methods mentioned previously.

VI. Emergency Operation Plan & Evacuation Procedures

Arizona Summit Law School has policies in place regarding immediate emergency response procedures as well as policies regarding evacuation procedures. Scheduled emergency response drills and evacuation procedures are conducted with building and the City of Phoenix Fire Department. The drills are designed for students and employees to ensure procedures are conducted appropriately, coordination efforts are aligned, and prominent roles are understood.

Evacuation Procedures

Some threats to the ASLS community may require occupants to immediately evacuate the building or to seek shelter within the building. Evacuation of the building will be signaled by activation of the audible fire alarm evacuation system. The assembly locations have been predetermined and are practiced during evacuation exercises throughout the year. In the event an emergency occurs which dictates safety be sought within the school building, appropriate information will be announced via the school's notification system.

Annual Notification and Testing of Emergency Response Procedures

The school will, on an annual basis, provide the campus community with a summary of the ASLS emergency response and evacuation procedures in conjunction with a test (scheduled exercises and drills that contain follow-through activities and are designed for assessment and evaluation of emergency plans and capabilities) that meets all of the requirements of the Higher Education Opportunity Act. The school conducts several emergency response exercises throughout the year. These tests may be announced and unannounced. Planned activations will be disseminated to the entire campus community by email from the Facilities/Security Director.

Testing of complete campus-wide activation of emergency response and evacuation procedures is conducted a minimum of once a year.

Records for each emergency response and evacuation test will be maintained including information such as the description, time and date of the test, and whether the test was announced or unannounced.

Emergency Preparedness/Response Guides

When there is a scheduled activation of emergency response, the entire campus community will receive information regarding the specific procedures to follow as it pertains to the emergency/disaster response being tested via a campus-wide email. Emergency information is also posted on the appropriate floors on campus. Additionally, the Facilities/Security Director meets with students to inform them by covering basic emergency preparedness and response procedures, including evacuation guidelines, held at the orientation each semester.

In the event of a(n):

...ACTIVE SHOOTER

NOTE: An individual must use his/her own discretion during an active shooter event as to whether he/she chooses to run to safety or remain in place. However, best practices for an active shooter event are listed below.

The potential for a school shooting exists on every campus throughout the United States. Although the possession of firearms on or around the campus is prohibited, previous local and national shootings dictate the importance and need for a response plan. In the event you observe an individual with any type of weapon on campus, immediately contact the Phoenix Police Department by calling 9-1-1, and notify the Facilities/Security Director at (602) 682-6841.

In an Active Shooter Emergency:

Make a decision, trusting your instincts, to take action to protect yourself to survive the situation. You generally will have three options:

1. Run. Getting Out:

- Have an escape route and plan in mind.
- You will have to rely partially on instinct.
- If you can and you deem it safe, get out and get to a safe place.
- Leave your belongings behind but take your cell phone if it is handy.
- Keep your hands visible.

2. Hide. Hiding in a Safe Place:

- Hide in an area out of the shooter's view. Find a hidden location.
- Block entry to your hiding place and lock the doors.

- Silence your cell phone and/or pager.
- Find protections behind furniture if possible.
- Find a room that locks if you can.
- If possible, close and lock the outside door to the room. Blockade the door with Furniture or other heavy objects.
- Close the blinds, turn off the lights, remain quiet, silence cell phones, spread out away from other individuals, and move behind available cover. Stay on the floor, away from doors or windows, and do not peek out to see what may be happening.
- Make a plan with others in the room about what you will do if the shooter enters.
- Make a total commitment to action and act as a team with others.
- Do whatever is necessary to survive the situation.
- If possible and safe to do so, report the location of the assailant.

3. Fight

- As the last resort and only when your life is in imminent danger.
- Attempt to incapacitate the shooter.
- Act with physical aggression and throw items at the active shooter.

If Outside When a Shooting Occurs:

- Drop to the ground immediately, face down as flat as possible. If within 15-20 feet of a safe place or cover, duck and run to it.
- Move or crawl away from gunfire, trying to utilize any obstructions between you and the gunfire. Remember that many objects of cover may conceal you from sight, but may not be bulletproof.
- When you reach a place of relative safety, stay down and do not move. Do not peek or raise your head in an effort to see what may be happening.
- Wait and listen for directions from Public Safety and/or law enforcement personnel.

If a Suspect is in Close Proximity:

- An individual must use his/her own discretion about when he or she must engage a shooter for survival.
- Generally, one can lie motionless and pretend to be unconscious or confront the individual.
- Make a plan as to how you will survive the situation.
- Make a total commitment to action and act as a team with others if possible.
- Do whatever is necessary to survive the situation.

Help Out:

- Warn others.
- Help others escape.
- Keep others away from the danger area.

- Help the injured.
- Help others stay calm.

Calling for Help:

- If safe to do so, call the appropriate authorities. Do not assume that someone else has reported the incident.
- On Campus: call 9-1-1 and the Facilities/Security Director at (602) 682-6841.
- Be persistent; phones may be jammed.
- Calmly identify yourself and your exact location. Remain calm and answer the dispatcher's questions. The dispatcher is trained to obtain the necessary and required information for an appropriate emergency response.
- If safe to do so, stop and take time to get a good description of the suspect. Note height, weight, sex race, approximate age, hair color, clothing, scars/marks/tattoos, method and direction of travel, and name if known.
- If the suspect is entering a vehicle, note color, make and model, body style (2-door, 4-door), license plate, and special details or outstanding characteristics (like damage or bumper stickers). All of this takes only a few seconds and is of the utmost help to the responding officers.
- Although you are not expected to know all of the answers, answer them to the best of your ability. Even though you may think the questioning is wasting valuable time, the information you provide will enable the authorities to dispatch officers and other emergency personnel safely and effectively.

During your call you may be asked questions, such as:

- Where are you? What is the specific location of occurrence?
- What exactly is happening and how do you know? Is it still happening?
- Suspect Description?
- Where is the suspect now? What was his/her last known direction of travel?
- Do you know who the suspect(s) is? If yes, identify them and provide any background knowledge you may have.
- What types of weapons were used? Describe the weapon(s) or other dangerous object(s) if possible, and any visible ammunition:
 - Rifle?
 - Shotgun?
 - Handgun: revolver or automatic?
 - Ammunition: describe type, amount and type of container (metal box, cardboard box, backpack pockets and others)?
 - Knife or other dangerous weapons?
 - Explosive device: Give specific description
- Were any shots fired? Can you describe the sound and the number of shots fired?
- Are there any wounded and how many? Where are they located?

When Law Enforcement Arrives:

- When law enforcement reaches you, do not run at them or make sudden movements.
- The priority of the first responders will be to identify the shooter. Law enforcement will need to ensure that you are not the shooter.
- Remain calm and follow instructions.
- Be quiet and compliant.
- Do not scream, yell, point, or wave your arms.
- Do not hold anything in your hands that could be mistaken for a weapon (including cell phones). Put down any items in your hands (i.e. bags, jackets)
- Show the officers your empty hands and follow their instructions.
- Raise hands and spread fingers
- Do not stop to ask officers for help or direction when evacuating.
- Give the number of shooters.
- Give the location and physical description of the shooter.
- Give the number and types of weapons.
- When it is safe to do so, you will be given instructions as to how to safely exit your location.

In the Event that there are Hostages:

- Call 9-1-1 and be prepared to give the following information:
 - Identify hostage location in building or area
 - Number of assailants, if known
 - Number of hostages, if known
 - Identity of assailants, if known
 - Any description of assailants and weapons
 - Any demands made by the assailant(s)
- If you are at a distance, move away from the location to a safer area.
- If you can do so safely, evacuate the area to a safer location.

As soon as the Facilities/Security Director is aware of an incident, officers will work quickly with other law enforcement officials to safely secure the campus. Situation status updates will be broadcast over the emergency mass notification systems as soon as possible. The ASLS website will also be updated as soon as possible with critical information bulletins.

...BOMB THREAT

If you receive a bomb threat:

- Stay calm and courteous.
- Keep the bomb threat caller talking.
- Try to signal a co-worker to listen on the telephone line, if possible.
- Ask for specific bomb location and time of detonation.
- Gather as much information from the caller as possible.

- Write down the information.
- Listen for background noises.
- Listen closely to the voice for accents, speech impediments or age indications.
- If on campus, immediately call the Facilities/Security Director at (602) 682-6841 to report the incident.

...EXPLOSION

If there is an explosion:

- Immediately take cover under tables, desks or other such objects that will give protection against flying glass and debris.
- After the effects of the explosion have subsided, and you are on campus, call the Facilities/Security Director at (602) 682-6841.
- Try to establish what exploded, the extent of the damage and possible life-threatening hazards to determine your next course of action.
- Take immediate action to ensure your safety and the safety of others. Evacuate according to your building plan if necessary; otherwise, remain in your place of cover. If necessary, activate the building alarm system.
- Seek and assist any disabled persons in evacuating the building. Exit via stairway. **DO NOT USE ELEVATORS.**
- If you evacuate, go to an area upwind from the explosion site to avoid possible toxic fumes. Once outside, move at least 150 feet away from the effected building. Keep roadways and walkways clear for emergency vehicles.
- **WAIT FOR INSTRUCTIONS** from emergency personnel. **DO NOT RE-ENTER THE BUILDING** until instructed to do so by the Public Safety Department or other properly identified emergency personnel.

...FIRE

If you discover a fire in a building on campus:

- Alert the occupants verbally and by pulling the emergency alarms, and evacuate the building.
- If you hear the fire alarm immediately evacuate the building using the nearest available exit. **Do not attempt to fight a fire unless you have been trained to do so.**
- Feel the doorknob and the door. If they are hot, do not open the door. If they are cool, open slowly, if heat or heavy smoke rushes in, close the door immediately and remain inside.
- When leaving your room, be sure to take your key in case it is necessary to return to the room should conditions in the corridor deteriorate. Make sure to close the door tightly when evacuating.
- When exiting in smoky conditions keep your hand on the wall and crawl to the nearest exit. Always know more than one path out of your location and the number of doors between your room and the exit.

- Seek and assist any disabled or mobility impaired persons in evacuating the building. Exit via stairway.
- DO NOT USE ELEVATORS. Elevator shafts may fill with smoke or the power may fail, leaving you trapped. Elevators have features that recall and deactivate the elevator during an alarm. Standing and waiting for an elevator wastes valuable time.
- Once outside, move to an open area at least 150 feet away from the effected building(s).
- Avoid inner courtyards.
- Each occupant should report to their assigned assembly area. Building Safety managers should report to their assigned assembly area and make sure that occupants have cleared the building. Conduct a head count and do not allow re-entry into the building until directed to do so by emergency personnel.
- If you are on campus, notify the Facilities/Security Director at (602) 682-6841. They will notify the fire department and guide them as quickly as possible to the location of the fire.
- Keep roadways and walkways clear for emergency vehicles.
- Wait for the instructions from the Facilities/Security Director or emergency personnel. DO NOT REENTER THE BUILDING UNLESS INSTRUCTED TO DO SO BY PUBLIC SAFETY OR THE SAN DIEGO FIRE DEPARTMENT.

...GAS LEAK/LINE BREAK

If there is a gas leak or water/sewage line break:

- If evacuation of the building is necessary, exit via stairway. DO NOT USE ELEVATORS.
- Seek and assist any disabled persons in evacuating the building.
- Evacuate to an area away and downwind from the leak or break.
- Do not turn lights on or off and extinguish all flames if possible to do so safely.
- If you are on campus between 7:30 a.m. and 4 p.m., notify the Facilities/Security Director at (602) 682-6841.
- If you are on campus after hours, notify the Facilities/Security Director at (602) 682-6841 or deliver a message to the Facilities/Security Director in their office located at Two North Central Ave, Suite 1800.

...HAZARDOUS MATERIALS

If there are hazardous materials:

- **Chemicals and Solvents.** If immediate fire hazard exists or medical assistance is required on campus, call the Facilities/Security Director at (602) 682-6841, activate alarm, evacuate area and await assistance.
- **Radioactive Material**

- If skin is lacerated by glassware or equipment contaminated with radioactive material, immediately wash the wounded area thoroughly under a cold stream of water.
- Keep all personnel away from the area of the spill.
- If you are on campus:
 - Notify the Facilities/Security Director at (602) 682-6841.
- **Ingestion of Radioactive Material.** Accidental ingestion or swallowing of radioactive material should be treated like other types of poisoning. Large volumes of water should be swallowed, followed by throat stimulation by the fingers to induce vomiting. If on campus, call the Facilities/Security Director at (602) 682-6841.
- **For spills not involving immediate danger to life and/or property.** Any spill that can potentially cause injury to a person or property must be reported to the Facilities/Security Director at (602) 682-6841.
 - Confine the spill.
 - Evacuate the immediate area and limit access.
 - Notify the Facilities/Security Director.

Know the Terms:

Familiarize yourself with these terms to help identify a nuclear power plant emergency:

- **Notification of Unusual Event** - A small problem has occurred at the plant. No radiation leak is expected. No action on your part will be necessary.
- **Alert** - A small problem has occurred, and small amounts of radiation could leak inside the plant. This will not affect you and no action is required.
- **Site Area Emergency** - Area sirens may be sounded. Listen to your radio or television for safety information.
- **General Emergency** - Radiation could leak outside the plant and off the plant site. The sirens will sound. Tune to your local radio or television station for reports. Be prepared to follow instructions promptly.

Minimizing Exposure to Radiation

- **Distance** - The more distance between you and the source of the radiation, the better. This could be evacuation or remaining indoors to minimize exposure.
- **Shielding** - The more heavy, dense material between you and the source of the radiation, the better
- **Time** - Most radioactivity loses its strength fairly quickly.

If an accident at a nuclear power plant were to release radiation in your area, local authorities would activate warning sirens or another approved alert method. They also would instruct you through the Emergency Alert System (EAS) on local television and radio stations on how to protect yourself.

The Facilities/Security Director will coordinate with local public health officials to determine appropriate actions and will convey the information to the campus community.

...POWER OUTAGE

If there is a power outage:

- If evacuation of the building is necessary, exit via a stairway, DO NOT USE ELEVATORS.
- Seek and assist any disabled persons in evacuating the building.
- If there are special procedures you wish to be carried out in the event of a future power outage, make prior arrangements with the Facilities/Security Director.
- If you are at the main campus notify the Facilities/Security Director at (602) 682-6841. Phones may not be operating properly. If there is no answer, send a messenger to the Facilities/Security Director Office.
- In the Event People are trapped in an Elevator:
 - Tell the passengers to stay calm and that you will get help.
 - Call the Facilities/Security Director at (602) 682-6841.
 - Try to keep the trapped passengers calm. Talk to them until help arrives.

...SUSPICIOUS PACKAGE

If you see a suspicious package:

- Immediately notify the Facilities/Security Director at (602) 682-6841 of the exact location and description.
- Do not touch or disturb the suspected bomb.
- Do not use radios or cell phones as these may activate some types of bombs.
- Utilize site evacuation plan to move all staff and students away from the suspected bomb location. A minimum of 500 feet is recommended.
- If possible, shut off gas main and electrical power to minimize the possibility of fire.
- Gather any possible witnesses for Public Safety to interview.
- Upon arrival, law enforcement or fire personnel will assume responsibility. All investigations will be conducted by the Facilities/Security Director or the Phoenix Police Department.

FIRE SAFETY

Reporting a Fire on Campus

Any community member who discovers a fire or other burning on campus should immediately contact the Facilities/Security Director at (602) 682-6841. The Facilities/Security Director will then notify the Phoenix Fire Department and guide them quickly to the location of the fire. If a community member finds evidence of a fire that has been extinguished, they should also

immediately contact the Facilities/Security Director at (602) 682-6841 to ensure that the Facilities/Security Director is aware of and has responded to and documented the incident for potential inclusion in the institution's fire statistics.

Fire Safety Systems

Fire alarms or smoke detectors are installed in the campus building and alert the occupants of potential hazards when activated. Fire alarms at the campus are connected to control panels that are monitored 24/7. Upon activation of a fire alarm, indicated by an audible siren, community members must immediately evacuate to the building predetermined evacuation area, exiting through stairwells not elevators. Community members should not re-enter the building unless authorized to do so by the Phoenix Fire Department (PFD) or the Facilities/Security Director.

Evacuation Procedures in Case of a Fire:

- If you hear the fire alarm immediately evacuate the building using the nearest available exit. There are two stairwell exits on each floor of campus (east and west side). **Do not attempt to fight a fire unless you have been trained to do so.**
- When exiting in smoky conditions keep your hand on the wall and crawl to the nearest exit. Always know more than one path out of your location and the number of doors between your room and the exit.
- Seek and assist any disabled or mobility impaired persons in evacuating the building. exit via the stairway.
- DO NOT USE ELEVATORS. Elevator shafts may fill with smoke or the power may fail, leaving you trapped. Elevators have features that recall and deactivate the elevator during an alarm. Standing and waiting for an elevator wastes valuable time.
- Notify the Facilities/Security Director at (602) 682-6841. The Facilities/Security Director will notify the fire department and guide them as quickly as possible to the location of the fire.
- Keep roadways and walkways clear for emergency vehicles.
- DO NOT REENTER THE BUILDING UNLESS INSTRUCTED TO DO SO BY THE FACILITIES/SECURITY DIRECTOR OR PHOENIX FIRE DEPARTMENT.

All individuals are expected to follow fire evacuation procedures, regardless of the nature of the alarm (legitimate or false activation). Specifically, for students, failure to follow fire evacuation procedures may result in disciplinary action and fines.

The school continues to assess and upgrade fire safety equipment as an ongoing process, to ensure that all equipment meets National Fire Safety standards.

Arizona Summit Law School prohibits smoking and the use of any smoking or tobacco products at all times on or in ASLS campus, either indoor or outdoor. Fire safety components that are addressed in inspections include ensuring that fire-rated, emergency exit and/or rolling steel

fire doors are not propped open or tampered with, and any misuse and/or tampering of fire equipment (i.e. fire alarms, smoke detectors, fire extinguishers or hoses) has not occurred.

VII. Crime Prevention and Safety

ASLS is committed to providing a safe and secure environment for all faculty, staff, students, and visitors. Students and employees are informed of ASLS' security procedures and are informed about safety awareness and crime prevention during new student and new employee orientation. Ongoing safety training is also provided, but students and employees are encouraged to be aware of their responsibility for their own security and the security of others, which includes utilized security escorts.

ASLS does not have any officially recognized student organizations with off-campus locations, e.g., fraternities or sororities.

VIII. Notification for Missing Students

If a member of the ASLS community has reason to believe that a student is missing, the school requires that individual to immediately contact the Facilities/Security Director at (602) 682-6841. The Facilities/Security Director will collaborate with other school officials, and/or the appropriate law enforcement agency to make an effort to locate the student and determine his or her state of health and well-being. The Facilities/Security Director will gather pertinent information about the student from the reporting person or others. Such information may include but is not limited to the student's description, cellular phone number, clothes last worn, vehicle description, information about the student's health or well-being, or an up-to-date photograph.

School officials also will endeavor to determine the student's whereabouts by contacting friends, associates, faculty members, and/or employers of the student, and/or determining whether the student has been attending classes, scheduled organizational or academic meetings, and work. The Facilities/Security Director may enlist the aid of the neighboring police agency having jurisdiction.

Notices will be made to each of the following individuals within 24 hours of the Head of Security's, or a local law enforcement agency's determination that the student is missing:

- The school is required by law to notify the student's custodial parent or guardian if the student is under age 18 and is not emancipated at the time he or she is determined to be missing. If the student is age 18 or over, notification may be provided to the student's parent or guardian, in addition to any other person identified as the student's designated emergency contact.
- Local Law enforcement personnel.

- The student’s designated emergency contact (if any).

After the student has been located, the Facilities/Security Director will attempt to verify the student’s state of health, well-being, and intention of returning to campus. When and where appropriate, a referral may be made to the Wellness Counselor, and/or a community provider.

IX. Information Disclosure for Crime Victims

Arizona Summit Law School will, upon written request, disclose to the alleged victim of a crime of violence or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by the institution against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of such a crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

X. Sexual Misconduct and Relationship Violence Reporting and Procedures

Arizona Summit Law School is committed to upholding standards that promote respect and human dignity in an environment that fosters academic excellence and professionalism. Sexual misconduct and relationship violence in any form are antithetical to the school’s mission and core values, violate school policy, and may also violate federal and state law.

A. Policy Statement

Title IX of the Education Amendments of 1972 (“Title IX”), 20 U.S.C. §1681 et seq., is a federal law that prohibits discrimination on the basis of sex in education programs and activities by educational institutions that receive federal financial assistance. Prohibited sex discrimination includes sex harassment. Prohibited sex harassment, in turn, includes but is not limited to sexual assault and other forms of sexual violence.

The Violence Against Women Reauthorization Act of 2013 (“VAWA”), including the Campus Sexual Violence Elimination Act (“Campus SaVE Act”) amending the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (“Clery Act”), is a federal law that requires colleges and universities to have procedures in place to respond to incidents of sexual assault, domestic violence, dating violence, and stalking. All such offenses are prohibited by the school.

Arizona Summit Law School’s policy is to comply with the federal Campus Sex Crimes Prevention Act. This Act requires registered sex offenders to provide notice to the State “of each institution of higher education in that State at which the person is employed,

carries on a vocation, or is a student...” Thus, any registered sex offenders who are current employees, students, or carry on other vocations at ASLS will be required to notify the State of Arizona of their status. In addition, such institutions of higher education are required to provide information to their campus community regarding where to obtain law enforcement information concerning such registered sex offenders. The Arizona Department of Public Safety maintains a website, www.azdps.gov/services/public/offender, which provides information regarding registered sex offenders. Please note, however, that it is illegal under Arizona law to use any disclosed public information to commit a crime against any registrant or to engage in illegal discrimination or harassment against any registrant.

The school maintains a Policy Prohibiting Discrimination and Harassment that includes sexual harassment among its prohibited behaviors and that applies to all employees and students. Sexual Misconduct and Relationship Violence are forms of sex harassment prohibited by that policy, whether the conduct at issue occurred on or off campus. In order to address its responsibilities under Title IX and the VAWA, the school has implemented these reporting and response standards and protocols specifically to address incidents of Sexual Misconduct and Relationship Violence. In addition, and in compliance with the Clery Act, these standards are issued to inform the campus community of the school’s programs to address and prevent sexual assault, domestic violence, dating violence, and stalking, as well as the procedures for institutional disciplinary action in cases that are reported to the school, whether the conduct occurs on or off campus.

All students, faculty, administrators, and staff at the school are expected to be familiar with and to abide by these Standards and Protocols.

B. Key Definitions

- “Alleged Offender” is any individual who is alleged to have committed an act or acts of Sexual Misconduct or Relationship Violence.
- “Complainant” is a person who reports that he or she has allegedly experienced an act or acts of Sexual Misconduct or Relationship Violence.
- “Consent” is an affirmative, conscious and voluntary agreement to engage in sexual activity. It is an informed decision made freely, actively and voluntarily by all parties. It is the responsibility of each person involved in the sexual activity to ensure that he or she has the affirmative consent of the other or others to engage in the sexual activity. Affirmative consent must be ongoing throughout a sexual activity and can be revoked at any time. Lack of protest or resistance does not mean consent, nor does silence mean consent. Consent cannot be obtained by threat, coercion, or force. Furthermore, a current or previous dating or sexual relationship between the persons involved should

never by itself be assumed to be an indicator of consent. Being intoxicated does not diminish one's responsibility to obtain consent.

A person cannot give consent if he or she (1) is a minor (under age 18); (2) has a mental disorder or developmental or physical disability that renders him or her incapable of giving consent, and this is known or reasonably should have been known to the Alleged Offender; (3) is unconscious of the nature of the act, and this is known to the Alleged Offender; or (4) is incapacitated from alcohol or other drugs, and this condition is known or reasonably should have been known to the Alleged Offender. Some indicators that an individual is or may be incapacitated due to intoxication may include, but are not limited to, vomiting, unresponsiveness, inability to communicate coherently, inability to dress/undress without assistance, inability to walk without assistance, slurred speech, loss of coordination, or inability to perform other physical or cognitive tasks without assistance.

In the evaluation of any complaints in any School disciplinary process, it shall not be a valid excuse to alleged lack of affirmative consent that the Alleged Offender accused believed that the Complainant consented to the sexual activity under either of the following circumstances: (a) the Alleged Offender's belief in affirmative consent arose from the intoxication or recklessness of the Alleged Offender; or (b) the Alleged Offender did not take reasonable steps, in the circumstances known to the Alleged Offender at the time, to ascertain whether the Complainant affirmatively consented.

In the evaluation of any complaints in any School disciplinary process, it shall not be a valid excuse that the Alleged Offender believed that the Complainant affirmatively consented to the sexual activity if the Alleged Offender knew or reasonably should have known that the Complainant was unable to consent to the sexual activity under any of the following circumstances: (a) the Complainant was asleep or unconscious; (b) the Complainant was incapacitated due to the influence of drugs, alcohol, or medication, so that the Complainant could not understand the fact, nature, or extent of the sexual activity; (c) the Complainant was unable to communicate due to a mental or physical condition.

- "Dating Violence" means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence.
- "Domestic Violence" means a felony or misdemeanor crime 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 jurisdiction in which the crime of violence occurred; 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 jurisdiction in which the crime of violence occurred.

- "Relationship Violence" includes Dating Violence and Domestic Violence.
- "Sexual Assault" is any unwanted physical contact of a sexual nature that occurs either without the consent of each participant or when a participant is unable to give consent freely. Physical contact of a sexual nature includes, but is not limited to, touching or attempted touching of another person's breasts, buttocks, inner thighs, groin, or genitalia, either directly or indirectly, or sexual penetration (however slight) of another person's oral, anal or genital opening. Sexual assault includes, but is not limited to, rape, sodomy, oral copulation, sexual battery, sexual penetration with an object, forcible fondling (e.g. unwanted touching or kissing for purposes of sexual gratification), or threat of sexual assault. Sexual assault can occur either forcibly and/or against a person's will, or when a person is unable to give consent freely.

For the purpose of this policy, "sexual assault" also includes any sexual offense, as defined by the Clery Act, which meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's Uniform Crime Reporting (UCR) program. Those definitions are as follows:

- "Rape" is defined as the penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
- "Fondling" is defined as the touching of the private body parts of another person for the purposes of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his or her age or because of his or her temporary or permanent mental incapacity.
- "Incest" is defined as sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by laws.
- "Statutory rape" is defined as sexual intercourse with a person who is under the statutory age of consent.

- “Sexual Exploitation” is sexual misconduct that occurs when a person takes unjust or abusive sexual advantage of another for his or her own advantage or benefit or for the benefit or advantage of anyone other than the exploited party; and that behavior does not otherwise constitute sexual assault. Examples of sexual exploitation include, but are not limited to, videotaping or photographing of any type (web-cam, camera, Internet exposure, etc.) without knowledge and consent of all persons; prostituting another person; knowingly transmitting HIV or a sexually transmitted disease to an unknowing person or to a person who has not consented to the risk; or inducing incapacitation with the intent to commit sexual assault, without regard to whether sexual activity actually takes place.
- “Sexual Harassment” is a form of sex discrimination prohibited by Title IX. It is unwelcome conduct of a sexual nature when submission to such conduct is made either explicitly or implicitly a term or condition of the person’s employment or education; submission to or rejection of such conduct by a person is used as the basis for a decision affecting the person’s employment or education; or such conduct has the purpose or effect of unreasonably interfering with a person’s employment or education or creating an intimidating, hostile, or offensive employment or educational environment. Prohibited conduct can include unwelcome sexual advances, requests for sexual favors, and other verbal, nonverbal or physical conduct of a sexual nature.
- “Sexual Misconduct” includes Sexual Harassment, Sexual Assault, Sexual Exploitation, and Stalking.
- “Stalking” means engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person’s safety or the safety of others or to suffer substantial emotional distress. For the purpose of this definition:
 - “Course of conduct” means two or more acts, including, but not limited to, acts in which the stalker 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 victim.
 - “Substantial emotional distress” means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

C. Privacy and Confidentiality

The school is committed to protecting the privacy of all individuals involved in a report of Sexual Misconduct or Relationship Violence. In any report made under these

Standards and Protocols, the privacy interests of those involved will be protected in a manner consistent with the need to respond to and to conduct a thorough review of the incident reported. Information will be shared only with those individuals who have a legitimate need to know the information in order to assist in the response to, investigation and/or resolution of the complaint. By only sharing personally identifiable information with individuals on a need-to-know basis, the school will maintain as private any accommodations or protective measures to the extent that doing so would not impair the ability of the school to provide those accommodations or protective measures. Please see Section IV below for information about reporting procedures and options.

Confidentiality, on the other hand, is not the same as privacy. Confidentiality means that the information shared with a certain school employee or outside professional cannot be disclosed to others without the express permission of the individual who shared the information.

Individuals who wish to obtain confidential assistance without making a report to ASLS may do so by speaking confidentially with professionals who are obligated by law to maintain confidentiality, subject to the stated terms of confidentiality by that office. At ASLS, students may speak confidentially with the following:

- Stacey Pynn, Director of Student Services
Two North Central Ave, Suite 1800
Phoenix, Arizona 85004
602-682-6838

Information shared with this confidential source will not be shared with ASLS without consent, unless the disclosure is specifically permitted or required by law, such as when the circumstances pose an imminent risk of harm to self or others or where the report involves the suspected abuse of a minor under the age of 18.

The school does not publish the names of crime victims or other identifiable information regarding victims in its daily crime log or in the annual crime statistics that are disclosed in compliance with the Clery Act. Furthermore, if a timely warning is issued pursuant to the Clery Act on the basis of a report of sexual assault, domestic violence, dating violence, or stalking, the name of the victim and other personally identifiable information about the victim will be withheld.

When an incident of Sexual Misconduct or Relationship Violence that is reported to ASLS discloses an alleged crime that constitutes an ongoing or continuing threat to the ASLS campus community, ASLS may issue a timely warning in a manner consistent with the requirements of the Clery Act.

D. Procedures and Options for Victims

ASLS strongly encourages all members of the school community to report information about any incident of Sexual Misconduct or Relationship Violence as soon as possible, whether the incident occurred on or off campus. Reports can be made either to ASLS or to law enforcement.

A person who has experienced or otherwise been impacted by an incident of Sexual Misconduct or Relationship Violence is urged to seek appropriate medical and/or mental health treatment as soon as possible. When the incident is reported to ASLS, ASLS will help the individual get to a safe place and seek medical attention.

The following medical treatment options are available:

- For emergency situations, contact 9-1-1 or go to the nearest hospital emergency room.
- For non-emergency situations during regular business hours, students may contact Stacey Pynn, Director of Student Services (602) 682-6838. To contact a provider after regular business hours, contact the Arizona Department of Public Safety at 602-223-2000.

A Complainant may seek a protective order, a restraining order, or other similar order issued by the court. At the Complainant's request, the Department of Public Safety will assist the Complainant in making the request. If an order is issued by the court, and if ASLS is notified of the order, the Department of Public Safety will take appropriate action to support its enforcement on ASLS property or at ASLS-sponsored events. Additional information about protective orders and restraining orders can be obtained through the court (www.phoenix.gov/court/protection-orders).

ASLS *requires* all faculty members, administrators, supervisors, and any employees who have responsibility for student welfare to promptly report information about any incident of Sexual Misconduct or Relationship Violence to ASLS as provided below, unless the employee is required by law to keep that information confidential by virtue of his or her professional role (e.g. the employee received the information in his or her role as a psychological counselor). In addition, those employees who have been informed by the Department of Public Safety that they are "Campus Security Authorities" under the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act ("Clery Act") are legally required to report such incidents to the Department of Public Safety. All such employees to whom an incident is reported should strongly encourage the reporting party, whether it is the individual who allegedly experienced the act or acts of Sexual Misconduct or Relationship Violence or a third party, to speak directly with the Title IX Coordinator, and/or the Facilities/Security Director.

- **Reporting to Arizona Summit Law School**

A report to ASLS of an incident of Sexual Misconduct or Relationship Violence should be made to any of the following:

- **Title IX Coordinator.** The Title IX Coordinator, Joe Perez, can be reached at Two North Central Ave., Suite 1800, Phoenix AZ 85004 or (602) 682-6841.
- **Facilities/Security Director.** The Facilities/Security Director, Joe Perez, can be reached at Two North Central Ave., Suite 1800, Phoenix AZ 85004 or (602) 682-6841.

Where the matter involves allegations of sexual assault or other criminal conduct and/or the matter involves the safety of any member of the ASLS community, the Facilities/Security Director will notify law enforcement of a report of Sexual Misconduct or Relationship Violence. If the incident is alleged to have been perpetrated against an individual under age 18, appropriate notifications will be made as required by Arizona law addressing the mandatory reporting of incidents of child abuse and neglect.

In every case, the Facilities/Security Director will inform the Title IX Coordinator of the report. In addition, if the incident involves a school employee, the Human Resources Officer will be informed of the report.

An individual who has experienced an incident of Sexual Misconduct or Relationship Violence may report the incident at any time, regardless of how much time has elapsed since the incident occurred. ASLS is committed to supporting the rights of a person reporting an incident of Sexual Misconduct or Relationship Violence to make an informed choice among options and services available.

ASLS will respond to all reports in a manner that treats everyone with dignity and respect and will take prompt responsive action to end any misconduct, prevent its recurrence, and address its effects.

- **Reporting to Law Enforcement**

An incident of Sexual Misconduct or Relationship Violence can be reported to law enforcement at any time, 24 hours a day/7 days a week, by calling 9-1-1.

At the Complainant's request, ASLS will assist the Complainant in contacting law enforcement. If the Complainant decides to pursue the criminal process,

ASLS will cooperate with law enforcement agencies to the extent permitted by law. A Complainant has the option to decline making his or her report to law enforcement but is strongly encouraged to do so.

As stated above, where the matter involves allegations of sexual assault or other criminal conduct and/or the matter involves the safety of any member of the ASLS community, the Facilities/Security Director will notify law enforcement of a report of Sexual Misconduct or Relationship Violence. A Complainant has the option to decide whether or not to participate in any investigation conducted by law enforcement.

- **Making an Anonymous Report**

An individual may report an incident of Sexual Misconduct or Relationship Violence anonymously at (asls.azsummitlaw.edu/onestop.YourSupport.html)

An anonymous report does not require the disclosure of the name of the person making the report or the names of individuals involved, and the anonymous report may, but need not, request any particular action. Depending on the amount of information available about the incident or the individuals involved, ASLS's ability to respond may be limited.

E. Preservation of Evidence and Identification of Witnesses

Any individual who has experienced an act or acts of Sexual Misconduct or Relationship Violence is encouraged to take steps to preserve evidence, as doing so may be necessary to the proof of a criminal act or to obtain a protection order from the court.

To preserve evidence, the urge to change clothes, bathe, shower, douche, change clothing or clean the bed or linens where the incident occurred should be resisted. If clothing is changed, each garment should be placed in a separate paper (not plastic) bag. If the incident involves any written or electronic communications (e.g. pictures, texts, social media posts, videos, etc.), preserve copies.

Additional steps that can be taken to preserve evidence include, but are not limited to, the following:

- **Medical-Legal Evidence Collection**

A person who has experienced an incident of Sexual Misconduct or Relationship Violence (particularly rape, forcible oral copulation, or sodomy) is encouraged to request collection of medical-legal evidence. Prompt collection of physical evidence through an exam is important should a person later decide to pursue criminal prosecution and/or a civil action. For more information please contact local authorities or the National Sexual Assault

Hotline (480-736-4949) (<https://hotline.rainn.org/online/terms-of-service.jsp>).

In addition, an individual who has experienced an act or acts of Sexual Misconduct or Relationship Violence is encouraged to identify potential witnesses.

F. Accommodations, Safety Measures, and Interim Measures

After a report is made and prior to a final determination, ASLS will provide written notification to the Complainant of options for accommodations, safety measures, and interim measures. ASLS will implement appropriate accommodations, safety measures, and interim measures to protect the Complainant and the needs of others involved in the incident, if so requested by the Complainant or others involved in the incident and if such measures are reasonably available, regardless of whether the Complainant chooses to make his or her report to local law enforcement or participate in any law enforcement investigation. The implementation of these measures typically is coordinated by or under the supervision of the Title IX Coordinator or the Facilities/Security Director.

These measures may include, but are not limited to:

- the implementation of a USD-issued no-contact order
- academic accommodations
- transportation accommodations
- employment accommodations
- safety consultations with the Department of Public Safety
- personal protection devices
- on-campus efforts

If ASLS receives a report that an ASLS-issued no-contact order has been violated, ASLS will investigate the report and initiate appropriate disciplinary proceedings and sanctions if the individual is found responsible for the violation.

Referrals also may be made to on-campus offices for information regarding student financial aid, immigration and visa assistance, leaves of absence, or other matters relating to the student's enrollment.

Until the matter is resolved, and when necessary and appropriate to protect the safety and well-being of the parties involved, the Dean of Academic Affairs, in consultation with the Title IX Coordinator, may limit an Alleged Offender's access to certain ASLS facilities or activities or may impose an interim suspension. Interim measures taken with respect to ASLS employees will be implemented in consultation with the Title IX

Coordinator in a manner consistent with the school's processes applicable to the employee.

G. Investigation

ASLS will respond promptly and equitably to all reports of Sexual Misconduct or Relationship Violence to ensure the safety of the individuals involved and the ASLS community, in order to provide an environment that is free from gender and sex discrimination.

When a report is made, ASLS will initiate an investigation which typically will be conducted either by or under the supervision of the Title IX Coordinator, or the Facilities/Security Director.

If a Complainant requests that his or her name or other identifiable information not be shared with the Alleged Offender or that ASLS not pursue an investigation or take any other action, ASLS will balance this request with its obligation to protect the Complainant and provide a safe and non-discriminatory environment for all ASLS community members. In these circumstances, ASLS will take all reasonable steps to investigate and respond to the report consistent with the request for confidentiality or request not to pursue an investigation, but its ability to respond may be limited by the request for confidentiality. ASLS will weigh the request for confidentiality against various factors, including but not necessarily limited to the following: the seriousness of the alleged conduct, any potential threats to campus safety, the respective ages and positions of the Complainant and Alleged Offender, whether there have been other complaints against the Alleged Offender, whether the Alleged Offender has a record of any prior acts of violence, and whether the circumstances suggest there is an increased risk of future acts of sexual violence under similar circumstances. ASLS will seek to respect the request of the Complainant, and where it cannot do so, ASLS will keep the Complainant informed about ASLS's chosen course of action. The Title IX Coordinator and the Dean of Academic Affairs are responsible for evaluating confidentiality requests.

Upon the conclusion of the fact-finding investigation, the findings are shared with those individuals at ASLS who have a legitimate need to know the information in order to respond to or resolve the complaint.

H. ASLS Disciplinary Procedures & Sanctions

Complaints of Sexual Misconduct or Relationship Violence against an ASLS student will be addressed pursuant to the Student Conduct Procedures contained in ASLS's Student Code of Conduct Handbook.

Complaints of Sexual Misconduct or Relationship Violence against an ASLS employee will be addressed pursuant to ASLS's Policy Prohibiting Discrimination and Harassment and the procedures applicable to the employee. If termination of a faculty member is contemplated, applicable rules governing dismissal for serious cause will be followed.

Typically, the period from commencement of an investigation through resolution will not exceed sixty (60) calendar days. This timeframe may be extended for good cause, which may exist if additional time is necessary to ensure the integrity and completeness of the investigation, to comply with a request by law enforcement for a temporary delay to gather evidence for a criminal investigation, to accommodate the availability of witnesses, to account for ASLS breaks or vacations, to account for the complexities of a case, including the number of witnesses and amount of information provided by the parties, and for other legitimate reasons. The Complainant and the Alleged Offender will be provided with periodic updates as to the status of the investigation.

The sanctions generally applicable to a student who is found responsible for violating ASLS's Student Code of Conduct is found within the Sanctions section of the Code. Engaging in Sexual Misconduct or Relationship Violence is a violation of ASLS's Student Code of Conduct and will result in the imposition of one or more such sanctions against the Alleged Offender, up to and including suspension or expulsion.

Sanctions against an employee who is found to have engaged in Sexual Misconduct or Relationship Violence may include, but are not limited to, verbal or written warnings, suspension, or termination from employment with ASLS. If termination of a faculty member is contemplated, applicable rules governing dismissal for serious cause will be followed.

I. Retaliation Prohibited

ASLS prohibits retaliation against any person who makes a good faith complaint of an incident of Sexual Misconduct or Relationship Violence or any other person who participates in the investigation of any such complaint. Any incident of retaliation should be promptly reported to the Title IX Coordinator, the Dean of Academic Affairs, the Facilities/Security Director, or the Human Resources Officer.

J. On-Campus and Off Campus Resources

Any individual who has been impacted by Sexual Misconduct or Relationship Violence is encouraged to seek appropriate help, whether or not the individual chooses to report the incident to ASLS. Specific on-campus and off-campus resources for counseling, health, mental health, victim advocacy, legal assistance and other services are listed below, and information about those resources is provided in writing to students and employees.

- **ASLS Campus Resources**

- **Title IX Coordinator**, Joe Perez, can be reached at Two North Central Ave, Suite 1800, Phoenix AZ 85004 or (602) 682-6841. Email at jperez@azsummitlaw.edu.

- **Facilities/Security Director**, Joe Perez, can be reached at Two North Central Ave, Suite 1800, Phoenix AZ 85004 or (602) 682-6841. Email at jperez@azsummitlaw.edu
- **Director of Student Services**, Stacey Pynn, can be reached at Two North Central Ave., Suite 1800, Phoenix, AZ 85004 or (602) 682-6838. Email at spynn@azsummitlaw.edu
- **Phoenix Community and National Resources**
 - **Sexual Assault Hotline**, (480) 736-4949 or (800) 656-HOPE. www.rainn.org
As the leading authority on sexual violence, RAINN is comprised of experts in victim services, education and communications, public policy, and technology. RAINN provides 24-hour hotline and victim advocacy, and counseling services.
 - **Southern Arizona Center Against Sexual Assault**, (520) 327-1171. www.sacasa.org
The Southern Arizona Center Against Sexual Assault (SACASA) provides crisis services, advocacy support, therapy and education for individuals and families impacted by sexual trauma. We provide a safe place to heal, gain strength, learn coping skills, and develop trusting, caring relationships.

K. Prevention & Risk Reduction Strategies

Bystander intervention is defined as safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is risk of dating violence, domestic violence, sexual assault, or stalking. 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. Bystanders play a critical role in the prevention of sexual misconduct and relationship violence. At Arizona Summit Law School, we are a community of Active Bystanders who strive to promote a culture of community accountability where bystanders are actively engaged in the prevention of violence without causing further harm.

We encourage all community members to learn to recognize the warning signs when someone is in danger and step in to prevent it. Active bystanders learn how to recognize and safely intervene in potentially dangerous situations. Sometimes this means distracting someone who appears to be targeting someone who is too drunk to consent. Other times, it means reaching out to ASLS staff or the police for help.

Some simple steps to becoming an Active Bystander include:

- Notice the situation: Be aware of your surroundings.
- Interpret it as a problem: Do I recognize that someone needs help?
- Feel responsible to act: See yourself as being part of the solution to help.
- Know what to do: Educate yourself on what to do.
- Intervene safely: Take action but be sure to keep yourself safe.

How to Intervene Safely:

- Tell another person. Being with others is a good idea when a situation looks dangerous.
- Ask the individual if they are okay. Provide options and a listening ear.
- Ask the person if they want to leave. Make sure that they get home safely.
- Call the police (9-1-1).
- If on campus, call the Facilities/Security Director at (602) 682-6841 for support options.

Acting as a community helps USD to be a safe place. Remember these tips when you are out:

- **Have a plan.** Talk with your friends about your plans for the night **BEFORE** you go out. Do you feel like *drinking*? Are you interested in *hooking up*? Where do you want to go? Having a clear plan ahead of time helps friends look after one another.
- **Go out together.** Go out as a group and come home as a group; never separate and never leave your friend(s) behind.
- **Watch out for others.** If you are walking at night with friends and notice a woman walking by herself in the same direction, ask her to join you so she doesn't have to walk alone.
- **Diffuse situations.** If you see a friend coming on too strong to someone who may not be able to make a consensual decision due to alcohol or other drug use, interrupt, distract, or redirect the situation. If you are too embarrassed or shy to speak out, get someone else to step in.
- **Trust your instincts.** If a situation or person doesn't seem "right" to you, trust your gut and remove yourself, if possible, from the situation.

Risk reduction means options designated to decrease perpetration and bystander inaction; increase empowerment for victims in order to promote safety; and help individuals and communities address conditions that facilitate violence. Risk reduction strategies can be helpful in understanding the context of violence but are never meant to attribute blame to victims for their behavior, decisions, or judgments. The perpetrator of abuse and violence is always the one responsible. There are strategies to assist with reducing risk, safety planning and recognizing abusive behaviors as harmful.

The adapted list below comes from Rape, Abuse & Incest National Network (RAINN), the nation's largest anti-sexual violence organization:

- **Know your resources.** Who should you contact if you or a friend needs help? Where should you go? Locate resources such as the campus health center, campus police station, and a local sexual assault service provider. Program the campus security number into your cell phone for easy access.
- **Stay alert.** When you're moving around on campus or in the surrounding neighborhood, be aware of your surroundings. Consider inviting a friend to join you or asking campus security for an escort. If you're alone, only use headphones in one ear to stay aware of your surroundings.
- **Be secure.** Lock your door and windows when you're asleep and when you leave the room. If people constantly prop open the main door to the dorm or apartment, tell security or a trusted authority figure.
- **Make others earn your trust.** A college environment can foster a false sense of security. They may feel like fast friends but give people time earn your trust before relying on them.
- **Make a plan.** If you're going to a party, go with people you trust. Agree to watch out for each other and plan to leave together. If your plans change, make sure to touch base with the other people in your group. Don't leave someone stranded in an unfamiliar or unsafe situation.
- **Protect your drink.** Don't leave your drink unattended, don't accept an open drink from anyone other than a bartender, and watch out for your friends' drinks if you can. If you go to the bathroom or step outside, take the drink with you or toss it out.
- **It's okay to lie.** If you want to exit a situation immediately and are concerned about frightening or upsetting someone, it's okay to lie. You are never obligated to remain in a situation that makes you feel uncomfortable, pressured, or threatened. You can also lie to help a friend leave a situation that you think may be dangerous. Some excuses you could use are needing to take care of another friend or family member, an urgent phone call, not feeling well, and having to be somewhere else by a certain time.
- **Be a good friend.** Trust your instincts. If you notice something that doesn't feel right, it probably isn't.

For more information about risk reduction strategies visit:

www.rainn.org/articles/staying-safe-campus

XI. Alcohol and Drug Policy

ASLS recognizes the importance of maintaining a safe, efficient, and healthful work environment for its employees, students, volunteers, and clients. As such, the ASLS campus has been designated as drug-free, safe, and healthy environment for students and employees. Only under certain circumstances and with prior written approval from the Dean or President is the consumption of alcohol permitted on campus.

The alcohol and drug policies herein are without limitation of any other alcohol and drug policies set forth by ASLS. Students and employees are subject to all applicable drug and alcohol policies including policies set forth in the Employee Handbook, Faculty Handbook, and Student Handbook, as applicable, or other applicable rules when adopted.

ASLS prohibits the unlawful possession, sale, manufacture or distribution of any controlled substance is illegal under both state and federal laws and is thus prohibited on campus. Additionally, furnishing or providing alcohol to anyone under 21 years of age, or for anyone under 21 years of age to possess alcohol, is illegal. Violations of any of the foregoing may also result in criminal prosecution, fine and/or imprisonment.

There are many health risks associated with the substance (alcohol and drug) abuse. Alcohol or drugs used in excess and over time can produce illness, disability, and death. The health consequences of substance abuse may be immediate and unpredictable, such as cardiac arrest with cocaine use, or more subtle and long term, such as liver deterioration associated with the prolonged use of alcohol. In addition to health-related problems, substance abuse can lead to financial difficulties, domestic violence, deterioration of the family structure, motor vehicle accident injuries, and reduced job performance.

Services for employees experiencing substance abuse issues are available through the ASLS health plan to assist employees that may be experiencing substance abuse. Employees participating in the company medical plan should contact their primary care physician or the United Healthcare "Care24 Services" for help. Care 24 is available 24 hours a day, 7 days a week at 1-888-887-4114 [TTY/TDD callers, please call the National Relay Center at 1-800- 828-1120 and ask for the foregoing number). Employee who do not participate in the company medical plan should contact Aetna Employee Assistance Program (EAP) at 1-877-327-5832. Aetna's EAP is available 24 hours a day, 7 days a week.

ASLS's drug and alcohol abuse program for students includes a presentation at each student orientation from the Member Assistance Program (MAP) from the State Bar of Arizona. For those who participate voluntarily, MAP offers confidential assistance to any Arizona attorney, judge or law student whose professional performance may be impaired because of physical or mental illness, emotional distress, substance abuse, compulsive gambling or other addictive behaviors. More information can be found at <http://www.azbar.org/MAP>. In addition, the Director of Student Services offers referrals to students who are experiencing substance abuse problems.

All members of the ASLS community are urged to seek help with substance abuse. Additional resources are:

Alcoholics Anonymous (Phoenix Metro)	http://www.aaphoenix.org/
Narcotics Anonymous (Phoenix Metro)	http://www.arizona-na.org/
St. Luke's Behavioral Health Center	http://www.stlukesbehavioralhealth.com/

Additionally, students and employees who violate drug and alcohol policies may be required to participate satisfactorily in a drug abuse assistance or rehabilitation program approved by the School.

At any ASLS event where there is alcohol served (as approved by the Dean pursuant to these policies), ASLS reserves the right to refuse to serve alcoholic beverages to anyone who is visibly intoxicated or whose behavior, at the sole discretion of ASLS and its agents, warrants the refusal of service. Any individual who arrives at an ASLS function either on or off campus in a visibly intoxicated state may, at the sole discretion of ASLS, or its agents, be denied entrance to the event.

Any student who is found guilty of violating a local, State, or Federal law pertaining to unlawful possession, use or distribution of illicit drugs and alcohol must notify the appropriate School official, in writing, no later than five (5) calendar days after conviction. Failure to comply with this notification requirement will result in immediate termination or dismissal.

No later than thirty (30) calendar days after receiving notification of such conviction from a student the School will:

- Take action against the student to include any range of authorized disciplinary actions up to termination/dismissal; and/or
- Require the student to participate satisfactorily in a drug abuse assistance or rehabilitation program approved by the School; and
- If the student is authorized to work on a grant provided by the Federal Government at the time of the incident, the School shall notify the agency which awarded the grant within ten (10) calendar days after receipt of notification from the student.

The School will review this policy and the relevant education assessment, and treatment programs annually to determine their effectiveness and to ensure that sanctions are consistently enforced. The School reserves the right to implement changes at any time by approval of the Dean.

XII. Crime Statistics

Crime Statistics Definitions

The following crime definitions are what are reported to the Department of Education on an annual basis according to current *Clery Act* regulations. Those same crime statistics follow these definitions.

- **Murder/Non-negligent manslaughter:** The willful (non-negligent) killing of one human being by another.

- **Negligent Manslaughter:** The killing of another person through gross negligence.
- **Sex Offenses, Forcible:** Any sexual act directed against another person, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent.
- **Sex Offenses, Non-forcible:** Any incidents of unlawful, non-forcible sexual intercourse.
- **Robbery:** The taking or attempting to take anything of value from the care, custody or control of a person or persons by forced or threat of force or violence and/or by putting the victim in fear.
- **Aggravated Assault:** An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.
- **Larceny/Theft:** Controlling the property of another with the intent to deprive the other person of such property.
- **Burglary:** The unlawful entry of a structure to commit a felony or theft.
- **Motor Vehicle Theft:** The theft or attempted theft of a motor vehicle. This includes all cases where a vehicle is taken by persons not having authority or legal access, even though the vehicle is later abandoned: "*Joyriding*"
- **Arson:** Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property or another, etc.
- **Liquor Law Violations:** The violation of laws or ordinances prohibiting the manufacture, sale, transporting, furnishing, possessing of intoxicating liquor; maintaining unlawful drinking places; bootlegging; operating a still; furnishing liquor to an underage person; using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; and all attempts to commit any of the aforementioned. (Driving under the influence is not included).
- **Drug Law Violations:** The violation of State and/or local laws relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs. The relevant substances include: opium or cocaine and their derivatives; marijuana; synthetic narcotics; and dangerous non-narcotic drugs.
- **Weapons Law Violations:** The violation of State and/or local laws dealing with weapon offenses, regulatory in nature, such as: manufacture, sale or possession of deadly weapons; carrying deadly weapons, concealed or openly; furnishing deadly weapons to minors; aliens possessing deadly weapons; and all attempts to commit any of the aforementioned.
- **Hate Crimes:** A reported crime motivated by or committed because of clear prejudice based on the following: race, gender, religion, sexual orientation, ethnicity, or disability.

A. Disclosure of Crime Statistics

ASLS Crime Statistics 2015-2017

2015			2016			2017		
On-Campus	Non-Campus	Public Property	On-Campus	Non-Campus	Public Property	On-Campus	Non-Campus	Public Property

Criminal Offenses

Murder/ Non-negligent manslaughter	0	0	0	0	0	0	0	0
Negligent manslaughter	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0
Statutory rape	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	2
Aggravated assault	0	0	3	0	0	2	0	2
Burglary	0	0	0	0	0	0	0	0
Motor vehicle theft	0	0	0	0	0	0	0	1
Arson	0	0	0	0	0	0	0	0

Hate Crimes

Murder/ Non-negligent manslaughter	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0
Statutory rape	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0
Motor vehicle theft	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0
Simple assault	0	0	0	0	0	0	0	0
Larceny-theft	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0

Destruction/damage/ vandalism of property	0	0	0	0	0	0	0	0
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2015			2016			2017		
On-Campus	Non-Campus	Public Property	On-Campus	Non-Campus	Public Property	On-Campus	Non-Campus	Public Property

VAWA Offenses

Domestic violence	0	0	0	0	0	0	0	0
Dating violence	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0

Arrests

Weapons: carrying, possessing, etc.	0	0	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0

Disciplinary

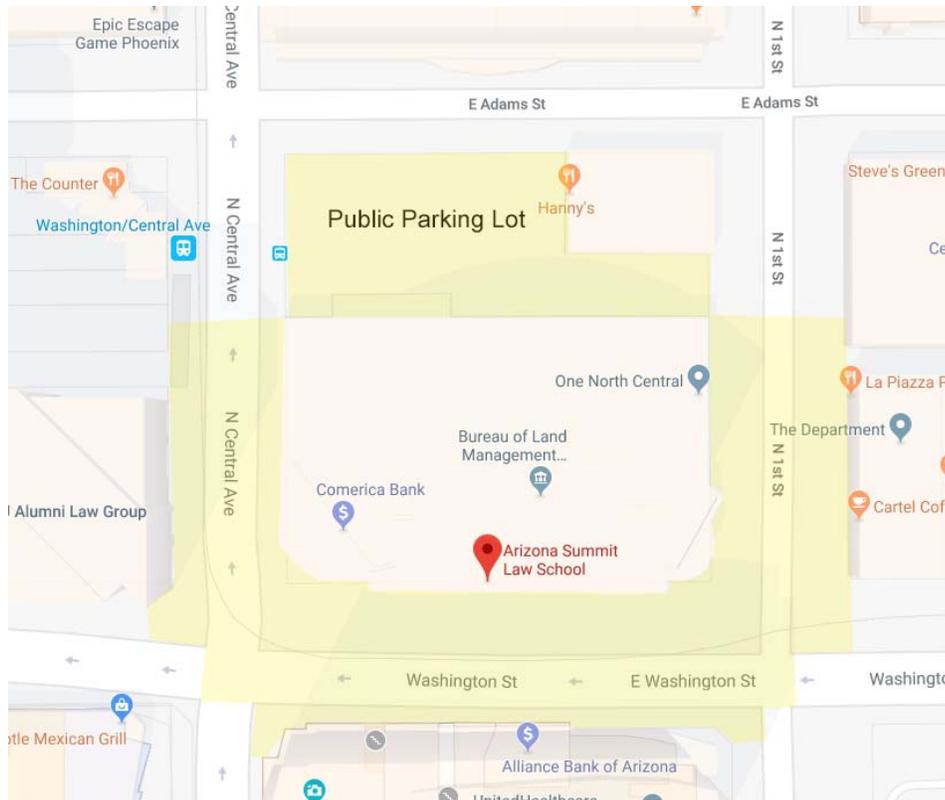
Actions

Weapons: carrying, possessing, etc.	0	0	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0

Unfounded Crimes

Total unfounded crimes	0	0	0	0	0	0	0	0
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B. Clery Act Reporting Geography



*Non-Campus and Public Property are locations not on Arizona Summit Law School's campus and are unaffiliated with the school.

Non-Campus and Public Property statistics provided by the Phoenix Police Department's crime mapping website. <https://www.phoenix.gov/police/neighborhood-resources/crime-stats-maps>

Hate crimes are motivated by or committed because of clear prejudice based on the following: race, gender, religion, sexual orientation, ethnicity or disability. The crimes of larceny-theft, simple assault, intimidation, and destruction/damage/vandalism of property have been added to the list of crimes that must be reported in hate crime statistics.