



STETSON LAW

## **Eighteenth Annual National Pretrial Competition**

Stetson University College of Law  
October 2-5, 2025

### **Competition Problem**

*Louise Shepard*

*v.*

*Westmoor Military Institute*

Case No. 2:25-cv-17241-RAR

The 2025 National Pretrial Competition Problem was drafted by Carson A. Sadro, J.D., Esq, Associate Director of the Center for Advocacy Education at Stetson University College of Law, with the assistance of Megan L. Sowell, Trial Attorney at Terrell Hogan. The Problem is the property of Stetson Law and may not be used, reproduced, or altered in any way without Stetson's express written permission.

## **TABLE OF CONTENTS**

Stipulations of the Parties.....	3
Notice of Hearing.....	4
Complaint.....	6
Answer and Demand for Jury Trial.....	15
Deposition of Louise Shepard.....	19
Deposition of Mark Riley.....	44
Deposition of Rollins Tucker.....	59
Deposition of Ellis Montgomery.....	66
Exhibit 1.....	72
Exhibit 2.....	75
Exhibit 3.....	76
Exhibit 4.....	77
Exhibit 5.....	78
Exhibit 6.....	79
Exhibit 7.....	81
Exhibit 8.....	82
Exhibit 9.....	83
Exhibit 10.....	85
Exhibit 11.....	86
Exhibit 12.....	93
Exhibit 13.....	95
Exhibit 14.....	98

**Stipulations of the Parties for the limited purpose of the hearing on  
Defendant's Motion for Summary Judgment.**

1. All exhibits are complete, accurate, and authentic.
2. All transcripts are true and accurate transcriptions of what was said.
3. All reports, transcripts, exhibits and photographs are complete, accurate, and true copies of the originals.
4. Exhibits 1, 2, 12, and 13 are admissible at any time without objections and may be entered and read into the record by either party at any time during the proceeding.
5. The Plaintiff will call Louise Shepard and Ellis Montgomery as witnesses. The Defense will call Mark Riley and Rollins Tucker as witnesses.
6. Louise Shepard is a female and must be played by a female student if a female student is a member of a team. If a team does not have a female student, Louise Shepard must still be referred to as a female throughout the course of the hearing.
7. Mark Riley is a male and must be played by a male student if a male student is a member of the team. If a team does not have a male student, Mark Riley must still be referred to as a male throughout the course of the hearing.
8. Ellis Montgomery and Rollins Tucker can be played as any gender consistent with the gender of the student playing the witness.
9. Without waiving any right to contest this issue at a later date, Defendant agrees that whether Plaintiff's belief that Westmoor engaged in gender discrimination was reasonable and made in good faith is not at issue in the hearing on Defendant's Motion for Summary Judgment. In accordance with that agreement, the parties further stipulate that Plaintiff's statements at the January 9, 2023, faculty meeting would qualify as a protected activity within the meaning of 42 U.S.C. § 2000e-3.
10. It is stipulated that on April 22, 2024, Louise Shepard received an offer from The University of the South as an Assistant Professor in the Fine Arts department.
11. It is stipulated that on August 11, 2024, Louise Shepard submitted a formal complaint to the Equal Employment Opportunity Commission. On November 14, 2024, Louise Shepard received a Notice of Right to Sue Westmoor Military Institute for a retaliatory hostile work environment based on gender discrimination.
12. Any and all arguments as to the sufficiency of the pleadings pursuant to Rule 8 of the Federal Rules of Civil Procedure have been heard by the Court and denied.
13. The parties stipulate that the 14th Circuit has adopted the 11th Circuit's standard for evaluating whether plaintiff has established a prima facie case of retaliatory hostile work environment.

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA**

LOUISE SHEPARD,

Plaintiff,

Case No. 2:24-cv-17241-RAR

vs.

WESTMOOR MILITARY INSTITUTE

Defendant.

---

**NOTICE OF HEARING**

**This Court notices the** Defendant's Motion for Summary Judgment for hearing on the 2nd day of October 2025, at 9:00 a.m.

1. The parties shall address only the following issues in the following manner on the aforementioned motions:
  - a. By Evidentiary Hearing and Oral Argument: Whether Defendant's Motion for Summary Judgement should be granted on either or both of the following grounds:
    - i. Whether Plaintiff can establish a prima facie case of a hostile work environment in retaliation to Plaintiff's opposition to discriminatory practices on January 9, 2023;
    - ii. Whether Defendant is shielded from liability under its affirmative *Faragher-Ellerth* defense.



2. Pursuant to the status conference held on Friday, August 1, 2025, the parties shall file with the Court memoranda of law in support of their motions by 11:59 p.m. on September 1, 2025.

/s/ EIB

Judge Elizabeth I. Boals  
United States District Court for the  
Middle District of Florida

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA**

LOUISE SHEPARD,

Plaintiff,

Case No. 2:25-cv-17241-RAR

vs.

WESTMOOR MILITARY INSTITUTE

Defendant.

---

**COMPLAINT**

Plaintiff, Louise Shepard (hereinafter “Shepard” or “Plaintiff”), by and through counsel, for Plaintiff’s Complaint against Defendant, Westmoor Military Institute (hereinafter “Westmoor” or “Defendant”), and pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000 et seq., alleges as follows:

**THE PARTIES**

1. Plaintiff is a resident of the United States who resides in Gulfport, Florida. She is and was at all times relevant to this Complaint, a citizen of the State of Florida and a resident of Pinellas County.

2. Defendant is an educational institution located in Gulfport, Pinellas County, Florida that can be served through their Registered Agent: Duke Hayes, Westmoor Military Institute Office of General Counsel, Post Office Box 183189, Gulfport, Florida 33710.

3. Plaintiff was previously employed by Defendant as an Assistant Professor in the Philosophy Department from June 1, 2022 through April 22, 2024.

## **JURISDICTION AND VENUE**

4. Jurisdiction of this Court is invoked pursuant to Title VII of the Civil Rights Act of 1964, as amended (42 U.S.C. § 2000e et. Seq.). This Court has jurisdiction over the claims asserted herein pursuant to 28 U.S.C. §§ 451, 1331, 1343, and 1367.

5. Venue is proper before this Court pursuant to 28 U.S.C. § 1391(b) in that a substantial part of the events or omissions giving rise to the present claim occurred within this judicial district.

6. Plaintiff filed a formal inquiry with the EEOC on August 11, 2024, that was assigned charge number 424-2023-0626 alleging discriminatory conduct in the form of a retaliatory hostile work environment.

7. On or about November 14, 2024, Plaintiff received a notice of suit rights from the EEOC, advising her that she had 90 days to file against Defendant under Title VII as to the charge of discrimination in the form of a retaliatory hostile work environment (No. 424-2023-0626).

8. At all relevant times, Defendant has continuously been an employer engaged in an industry affecting commerce within the meaning of Sections 701(b), (g), and (h) of Title VII, 42 U.S.C. § 2000e(b), (g), and (h). Furthermore, Defendant has continuously operated their business in Florida and this jurisdiction with at least fifteen employees.

9. The unlawful retaliation alleged below was committed within the jurisdiction of the United States District Court for the 14th Judicial Circuit.

10. Plaintiff asserts she was subjected to a retaliatory hostile work environment because Plaintiff engaged in a protected activity related to gender discrimination in violation of 42 U.S.C. § 2000e-3. As such, Plaintiff falls within the protected class as a “person” and/or “employee” as defined in 42 U.S.C. § 2000e(f) and/or 42 U.S.C. § 12111(4).

11. Defendant is an “employer” as that term is defined by 42 U.S.C. § 2000e(b) and/or 42 U.S.C. § 12111(5)(A).

### **STATEMENT OF FACTS**

12. The discriminatory conduct alleged herein occurred in connection with Plaintiff’s employment with Defendant as an Assistant Professor.

13. From June 1, 2022 through April 22, 2024, Plaintiff was employed at Westmoor as a college professor to teach classes in philosophy and related subjects as defined by Westmoor in her employment contract.

14. Almost immediately upon the start date of her employment, Plaintiff observed routine and ongoing instances of gender-based discrimination. Beginning in the Fall 2022 semester, Westmoor faculty members and students made remarks to or about Plaintiff and other women which led Plaintiff to reasonably believe that Westmoor discriminated against female faculty members on the basis of their gender in violation of 42 U.S.C. § 2000e-2. These statements included, but are not limited to:

- a. Assumed Plaintiff was a nurse during her service with the U.S. Army;
- b. Calling Plaintiff a “drill sergeant”;
- c. Referring to Plaintiff as the “newest little lady on campus.”
- d. Referring to Plaintiff as “overly assertive,” “not maternal,” and “too focused on female authors that didn’t actually make any real contributions.”
- e. Recommending that Plaintiff try to go with the flow of things like the “other female faculty members had.”
- f. On January 6, 2023, during WMI’s Annual Recognition Day, Plaintiff and Hayes observed a female cadet trip while running physical training drills. After the cadet

tripped, Hayes said, “This school really went downhill in 1989,” the initial year women were able to enroll at Westmore. He then turned to Plaintiff and added, “Same could be said for faculty,” before walking away.

15. On January 9, 2023, Plaintiff attended a monthly faculty meeting at which all faculty, college presidents, and university administration were present. During that meeting, Plaintiff presented her proposal for a one-day seminar titled “Ethical Reasoning in Military Conflict” to the faculty. At the beginning of Plaintiff’s presentation, faculty members were interested and engaged in the program. When Plaintiff began detailing her goal of intentionally including women in military leadership roles, several male faculty members disengaged by looking away, rolling their eyes, smirking, and laughing.

16. Following that observation in conjunction with her prior experiences of gender discrimination at Westmoor, Plaintiff asserted her right to engage in the lawful opposition of unlawful employment practices by calling on Westmoor to address its history of disparate and discriminatory treatment of female faculty members.

17. Plaintiff’s complaint at the faculty meeting was a protected activity within the meaning of 42 U.S.C. § 2000e-3.

18. Following Plaintiff’s assertion, Defendant engaged in unlawful employment practices on its campus in Gulfport, Florida in violation of 42 U.S.C. § 2000e-3.

19. From January 9, 2023, through April 22, 2024, Defendant retaliated against Plaintiff after Plaintiff engaged in a protected activity by creating a hostile work environment.

20. On February 21, 2023, as Plaintiff entered a faculty meeting, a tenured male professor was speaking with a new faculty member, Beau Hayes. As Plaintiff passed by them to enter the meeting, both men stopped talking and then began laughing once Plaintiff passed them.

21. On May 30, 2023, Professor Carr hosted a Memorial Day barbecue for faculty members which included Professors Riley, Hayes, Keating, Wyatt, Healy, and Montgomery. Plaintiff was not invited. Following the barbeque, Plaintiff learned that Riley criticized Plaintiff for “acting beyond her rank,” to the faculty members present. Further, Healy warned Riley that “if [Plaintiff] isn’t kept in line” she would turn the department into a “social justice blog.” Riley responded by agreeing with Healy and stating that Plaintiff, “brings combat boots to a poetry reading.” Professor Carr then remarked that he doubted Plaintiff would last long at Westmoor.

22. In June 2023, Riley assigned an upper-level course, Strategic Thinkers and Military Intellectuals to Hayes, bypassing Plaintiff despite her seniority and prior request to teach that same course.

23. In July 2023, Hayes approached Plaintiff and said, “Look, I’m not saying you’re not qualified, but you’re so damn dramatic. Stop trying to change the world and just teach your little classes. And hey, try throwing in a smile once in a while. You’re welcome.”

24. At the August 2023 cadet orientation, Riley again introduced Plaintiff as a “little lady” despite Plaintiff’s request to stop using this type of language when referring to her.

25. On September 2, 2023, Plaintiff learned that Professor Carr told cadets they should not take Plaintiff’s classes, describing them as “snowflake studies,” and encouraging enrollment in Hayes’s classes instead to “receive a real Westmoor education.” Plaintiff immediately reported Carr’s conduct to Riley, but no formal action was taken.

26. On September 19, 2023, Plaintiff discussed her idea for a panel with Professor Montgomery. Professor Healy interrupted Plaintiff to state, “We need to invite subject-matter experts, not just people with opinions and a cause.”

27. Although Plaintiff's panel was ultimately approved, attendance was low. Plaintiff later discovered that Riley failed to send out the event agenda to cadets.
28. Throughout Fall 2023, Plaintiff faced continued exclusion and mockery. Cadets withdrew from her classes or refused to engage if they remained, while faculty avoided or whispered about her.
29. On November 21, 2023, for the second time, Plaintiff was excluded from Riley's Thanksgiving dinner that was attended by a more junior male faculty member, Beau Hayes.
30. In November 2023, on the Monday following thanksgiving, Plaintiff overheard Hayes mocking Plaintiff and stating that Plaintiff would be included "if she didn't sound like a left-wing philanthropist all of the damn time. She's exhausting."
31. On December 19, 2023, Plaintiff received her anonymous student course evaluations. The student evaluations reflected an overwhelming sentiment of animosity towards Plaintiff, including one evaluation referring to Plaintiff as a "bitch."
32. On December 31, 2023, the administration announced office relocations due to construction. Riley assigned Hayes and Carr to new offices in the newly renovated Calhoun Hall, while Plaintiff was reassigned to Hammond Hall, an outdated facility plagued by mildew, plumbing issues, and rodents.
33. In January 2024, Plaintiff was advised by Riley that she would no longer be teaching American Political Thought in the Spring 2024 term and would instead be assigned an additional section of Introduction to Philosophy.
34. On January 3, 2024, Plaintiff contacted Human Resources and requested a meeting regarding the pattern of retaliation. On January 23, 2024, Plaintiff met with Assistant HR Director

Rollins Tucker and detailed her experiences, reporting the office relocation and course assignments.

35. Tucker failed to disclose that Tucker and Riley were childhood friends. Plaintiff later learned that Tucker and Riley were childhood friends, and Riley helped Tucker secure a job at Westmoor.

36. Defendant failed to conduct an impartial and complete investigation into Plaintiff's complaints.

37. Following Tucker's meeting with Plaintiff, Tucker warned Riley about the oncoming investigation via text message.

38. On February 3, 2024, Tucker, having failed to recuse themselves, conducted a meeting with Riley and determined that no retaliatory conduct had occurred.

39. On February 13, 2024, Plaintiff received an email from the Director of Human Resources affirming Tucker's finding that no discrimination in the form of a retaliatory hostile work environment had occurred.

40. By March 2024, having been excluded from faculty social events, relocated to an uninhabitable office, denied the opportunity to teach advance courses, having an upper level course removed from her schedule, and otherwise generally targeted for opposing Westmoor's unlawful practice and/or ratification of gender discrimination, Plaintiff began seeking alternative employment.

41. Section 703(a)(1) of Title VII of the Civil Rights Act of 1964, as amended, makes it an unlawful employment practice for an employer to discharge or discipline an employee because of her/his race, color, religion, sex, or national origin.



42. It is also an unlawful employment practice, under § 704(a) of Title VII, for an employer to discharge or discipline an employee because she has filed a Title VII charge, has participated in a Title VII investigation, or has otherwise opposed Title VII discrimination. (*See* § 614.) The factual allegations averred herein constitute retaliation for Plaintiff's opposition to discriminatory acts in the workplace and reporting the same to her management or university department. This tangible employment action constitutes retaliation as defined in Title VII for Plaintiff reporting the offending behavior averred herein. Plaintiff was subjected to hostile acts, attitudes, and such other conduct by employees and/or managers for opposing and/or reporting discriminatory conduct prohibited by § 704(a) of Title VII.

43. Defendant is strictly liable for the acts averred herein because managers and/or department heads/deans referenced herein had authority to materially alter the terms and conditions of employment for professors as employees under their supervision. Defendant failed to exercise reasonable care to prevent and correct promptly any harassing, and/or offending behavior. The frequency of the discriminatory conduct, its severity, and pervasiveness threatening and humiliating to Plaintiff unreasonably interfered with Plaintiff's work performance and adversely affected her emotional and/or psychological well-being. Such facts constitute a "hostile and/or "abusive" work environment. *See Meritor Savings Bank, FSB v. Vinson*, 477 U.S. 57 (1986). Plaintiff has suffered damages as a result of Defendant's discriminatory and/or retaliatory actions.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for the following relief against Defendant:

1. Declaration that the Defendant violated Plaintiff's rights to oppose discriminatory practices in the workplace by creating a retaliatory hostile work environment pursuant to Title VII of the Civil Rights Act of 1964.

2. Compensatory damages with prejudgment interest to Plaintiff for all salary, back pay, front pay, and benefits lost due to Defendant's unlawful actions in an amount not less than \$500,000.00 or to be determined;
3. Damages to Plaintiff for emotional distress, loss of enjoyment of life, embarrassment, and humiliation in an amount to be determined;
4. Punitive damages to Plaintiff in an amount to be determined;
5. Award to Plaintiff the costs and disbursements of this action, including reasonable attorneys' fees, costs, and expenses; and
6. Such other and further relief as the Court deems just and proper.

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 5, 2025, I filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send notice of this filing to: Alec M. Waid, Esquire, [alec@waidlawfirm.com](mailto:alec@waidlawfirm.com), Waid Law Firm, 301 Holly Drive, Gulfport, FL 33710, *Counsel for Defendant*.

/s/ Katherine E. Donoghue  
Katherine E. Donoghue  
302 Holly Drive  
Gulfport, FL 33710  
[kate@justicelaw.com](mailto:kate@justicelaw.com)  
*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA**

LOUISE SHEPARD,

Plaintiff,

Case No. 2:25-cv-17241-RAR

vs.

WESTMOOR MILITARY INSTITUTE

Defendant.

\_\_\_\_\_ /

**ANSWER AND DEMAND FOR JURY TRIAL**

Defendant, Westmoor Military Institute (hereinafter “Westmoor” or “Defendant”), by and through its undersigned counsel, responds to Plaintiff, Louise Shepard’s (hereinafter “Shepard” or “Plaintiff”), Complaint with this Answer and Demand for Jury Trial and states as follows:

1. Admitted for jurisdictional purposes only.
2. Admitted for jurisdictional purposes only.
3. Admitted.

**JURISDICTION AND VENUE**

4. Admitted for jurisdictional purposes only.
5. Admitted for jurisdictional purposes only.
6. Without knowledge, therefore denied.
7. Without knowledge, therefore denied.
8. Admitted.
9. Denied to the extent that Plaintiff was the recipient of unlawful retaliation. Otherwise admitted for jurisdictional purposes only.

10. Admitted that at all relevant times, Plaintiff was a “person” and/or “employee” as defined in 42 U.S.C. § 2000e(f) and/or 42 U.S.C. § 12111(4). Otherwise denied.

11. Admitted.

### **STATEMENT OF FACTS**

12. Denied.

13. Admitted.

14. Denied as phrased.

15. Denied as phrased.

16. Denied.

17. Denied.

18. Denied.

19. Denied.

20. Without knowledge, therefore denied.

21. Without knowledge, therefore denied.

22. Admitted that on May 30, 2023, Mark Riley attended a barbeque at Professor Carr’s home and made and/or heard the statements alleged therein. Otherwise, denied as phrased

23. Admitted that in June 2023, Mark Riley the Strategic Thinkers and Military Intellectuals course to Beau Hayes and referred to Beau Hayes as an “enforcer.” Otherwise, denied as phrased.

24. Without knowledge, therefore denied.

25. Admitted.

26. Admitted that Plaintiff made Defendant aware of her belief of assertions made by Professor Carr as alleged. Otherwise, denied.

27. Without knowledge, therefore denied.
28. Admitted that Plaintiff's panel was approved. Otherwise, denied as phrased.
29. Without knowledge, therefore denied.
30. Denied as phrased.
31. Without knowledge, therefore denied.
32. Admitted only as to the language of the evaluations themselves. Otherwise, denied as phrased.
33. Admitted as to the locations of the reassigned offices. Otherwise, denied as phrased.
34. Admitted that Plaintiff submitted a complaint through the human resources email address on January 3, 2024, and participated in a meeting with a human resources representative on January 23, 2024. Otherwise, denied as phrased.
35. Denied.
36. Admitted only as to the language of the text message itself. Otherwise, denied as phrased.
37. Denied as phrased.
38. Admitted.
39. Denied.
40. Denied.
41. Denied.

#### **GENERAL DENIAL**

Any and all allegations to which a specific response has not previously been provided is herein denied and strict proof thereof is demanded.

#### **DEFENSES**

1. Plaintiff has failed to make a sufficient allegation of ultimate fact from which it may be

determined that a claim for relief has been stated.

2. Pursuant to *Faragher v. City of Boca Raton*, 524 U.S. 775, 807-08 (1998) and *Burlington Indus., Inc. v. Ellerth*, 524 U.S. 742, 764-65 (1998), Defendant is not liable because Defendant took no adverse employment action, Defendant exercised reasonable care to prevent and promptly correct any alleged harassment, and Plaintiff unreasonably failed to take advantage of the corrective opportunity to participate in a mediation led by a neutral mediator provided by Defendant.

**DEMAND FOR TRIAL BY JURY**

WHEREFORE, Defendant, Westmoor Military Institute, hereby demands trial by jury on all issues so triable.

**I HEREBY CERTIFY** that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF and furnished via email a copy to: Katherine Donoghue, Esquire, Justice Law Group, this 15th day of February, 2025.

/s/ Alec M. Waid  
Alec M. Waid  
301 Holly Drive  
Gulfport, FL 33710  
alec@waidlawfirm.com  
*Attorney for Defendant*

DEPOSITION OF LOUISE SHEPARD

1 Q: Please state your name for the record

2 A: Louise Margaret Shepard

3 Q: How old are you?

4 A: I'm thirty-eight years old.

5 Q: What do you do for a living?

6 A: I'm an Assistant Professor at The University of the South. I primarily  
7 teach within our philosophy department focused on courses such as  
8 Introduction to Logic and Critical Thinking, Public Philosophy, and  
9 Twentieth-Century Continental Philosophy.

10 Q: When did you begin working there?

11 A: I accepted the position on April 22, 2024, and began work there around  
12 a month later.

13 Q: Did you work anywhere as a professor prior to your employment at The  
14 University of the South?

15 A. Yes. I was previously employed at the Westmoor Military Institute as  
16 an Instructor of Philosophy from June 1, 2022 through April 22, 2024.

17 Q: Do you have any prior experience with the military?

18 A: Yes. I grew up in South Carolina and both of my parents were in the  
19 service. After high school, I graduated with a B.A. in Philosophy from  
20 Wofford College in 2009. The economy was still pretty rough then, not a  
21 lot of work for philosophers, you know? So, I figured why not follow in  
22 my parents' footsteps and serve our country like they did. I direct  
23 enlisted in the U.S. Army right after graduation and was honorably  
24 discharged in the rank of Sergeant.

25 Q: Did you receive any other schooling prior to becoming a professor?

26 A: Of course. When I got back, I enrolled at the University of Florida

1 to obtain my Masters in Program Evaluation in Educational Environments  
2 and graduated from the program in 2015. I stayed at U.F. to obtain my  
3 Ph.D. in Philosophy and was able to successfully defend my dissertation  
4 in 2021.

5 Q: Was your employment at Westmoor your first role teaching?

6 A: No. While I was working on my dissertation I began teaching Philosophy  
7 courses at Santa Fe College for a couple of years.

8 Q: What drew you to Westmoor?

9 A: Honestly, the challenge. It's a respected military college and as a  
10 veteran, I thought I could connect with the cadets and bring something  
11 unique to their learning experience. I even served under a few captains  
12 that graduated from Westmoor, and I really looked up to them. I thought  
13 if they had a great experience as a student, I would have a great one  
14 as a professor.

15 Q: What was it like when you first started?

16 A: Like any new job really. I met my department Chair, Mark Riley. He  
17 was very polite, but Mark isn't a stop and chat kind of guy. He's all  
18 about efficiency. On my first day, he quickly ran through some logistical  
19 information and then it was a get thrown into the pool and swim kind of  
20 moment.

21 Q: Did you receive any formal training?

22 A: I guess you could say that. There was a small orientation by some  
23 employee in Human Resources, don't remember who, but it wasn't just  
24 other professors in there. The orientation was for every faculty or  
25 staff member starting that day from janitors to I.T. to me.

26 Q: I'm going to show you Exhibits 1 and 2. Do you recognize them?



1 A: Yes. Exhibit 1 are printouts from Westmoor's home page for human  
2 resources. The first page is the home page itself, and the second page  
3 is the printout of the page that appears if you click on "For Employees"  
4 on the home page. Exhibit 2 is Westmoor's Anti-Discrimination and  
5 Harassment Policy.

6 Q: When was the first time you saw Westmoor's Anti-Discrimination and  
7 Harassment Policy?

8 A: Honestly? Not until after all of this happened. The human resources  
9 library was really confusing and had hundreds of documents uploaded to  
10 it.

11 Q: Did anyone from Westmoor ever provide you with a copy of this policy?

12 A: I wouldn't say so. At the orientation, the person from human resources  
13 told us about the library and how we could look there if we had any  
14 questions about being an employee at Westmoor. But no one ever physically  
15 handed me a copy of the policy.

16 Q: Did the orientation trainer from human resources ever provide you  
17 with their direct contact information?

18 A: No.

19 Q: I want to talk about those first couple of months at Westmoor. What  
20 happened?

21 A: Well, it was pretty slow at first. In June I was planning out my  
22 courses—I was assigned to teach Introduction to Philosophy, European  
23 Literary Movements, and American Political Thought—for the fall. Intro  
24 and ELM were basic level courses for lower classmen, but APT was for  
25 upper classmen and most of those cadets were in the Philosophy program.  
26 Planning classes may not seem like a lot of work, but it is! It takes

1 weeks to plan out a course, especially if you haven't taught it before,  
2 and this was my first time teaching anything beyond introductory logic  
3 and philosophy courses. I really stayed holed up in my office that first  
4 month.

5 Q: Did you meet any of the other faculty members?

6 A: Mark did coordinate a faculty lunch for the Philosophy department  
7 towards the end of June. Myself, Mark, Professors Carr, Healy, Keating,  
8 and McLeod all attended.

9 Q: What was your interaction like with them?

10 A: In some ways it felt like a second interview. You could tell the men  
11 were close friends and clearly known each other for years. They asked  
12 me a lot of questions about my service, where I went to school, my Ph.D.  
13 program, things like that.

14 Q: Did you discuss anything else?

15 A: Yes. When I originally brought up my service, Carr asked me if I  
16 enjoyed being a nurse. I corrected him and explained that I wasn't a  
17 nurse, I was a combat sergeant. Carr and Healy seemed surprised by that.

18 Q: Did you meet any other faculty members over the summer?

19 A: I didn't meet most of them until my first faculty meeting. The faculty  
20 met in July to discuss the upcoming school year. I wanted them all to  
21 take me seriously. Mark formally introduced me and I told them about my  
22 combat experience, my family background, and my firm approach to course  
23 instruction. I didn't think I said anything odd, but Professor Carr  
24 joked, "You'd think we already have enough drill sergeants on campus."  
25 Everyone kind of laughed with him. I smiled and laughed too so it didn't  
26 look like it bothered me, but it was an embarrassing start.

1 Q: Did you have any other interactions with other faculty members around  
2 that time?

3 A: Yes. I remember early on in August, I was working on the final edits  
4 to my syllabus for European Literary Movements and I wanted advice on  
5 how to incorporate more female authors—I could hardly find any reference  
6 materials from female authors in the library. I reached out to one of  
7 the professors, Professor Wyatt, in the English department, we got to  
8 talking about Westmoor and the male professors' initial reaction to me,  
9 and she seemed to understand. Professor Wyatt gave me a few resources  
10 and told me, "it'll take some time, but you just have to get used to  
11 them."

12 Q: When the cadets arrived for the fall semester, what were your early  
13 interactions with them like?

14 A: Surprisingly positive. Although, at the cadet orientation, Mark Riley  
15 introduced me as the "newest little lady on campus." I was trying to  
16 make a good first impression with the cadets, and I was concerned that  
17 would lead to the cadets challenging my authority.

18 Q: Did the cadets challenge your authority?

19 A: Not really during that first semester. I remember in my Introduction  
20 to Philosophy course, we engaged in a lot of debates over exciting moral  
21 dilemmas. One day a cadet, Grant, even stayed after class to talk about  
22 moral injury in combat! The next day, he brought it up in class, and we  
23 all had a rich discussion. I walked out of that room buzzing—it felt  
24 like I was helping shape leaders.

25 Q: Were you able to make any friends on the faculty?

26 A: Yes. Eventually I made friends with Dr. Ellis Montgomery. Ellis became

1 a professor in Biology and Chemistry after an exciting career as a  
2 surgeon in Seattle. Ellis has the best stories and would admit how  
3 difficult it is to break into the "boys club" at Westmoor. Ellis always  
4 encouraged me to keep trying and that it would get easier once they got  
5 to know me.

6 Q: What do you mean by "boys club?"

7 A: Westmoor's been around since 1831, and in that time, it's been almost  
8 entirely led and taught by men. Westmoor didn't even begin admitting  
9 women until 1989! A lot of the professors there now were taught by  
10 professors that were around back then, and they still carry some of the  
11 same ideals. Typical ones, like men make better leaders and women kind  
12 of get pushed to the sidelines. It seemed like the male professors were  
13 part of a secret social club you needed a password to get in to. They  
14 would all go fishing, golfing, or grab a drink at Ace's over on Queens  
15 Street after classes together. Let's just say, I wasn't ever invited to  
16 any of those hang outs.

17 Q: Can you think of any specific events that you weren't invited to?

18 A: Yes. Mark Riley would host an annual Thanksgiving dinner at his house  
19 the week before the holiday. He would invite at least twenty or so  
20 faculty members over, but I guess I didn't have the proper seniority or  
21 gender to attend.

22 Q: Are you aware of any female faculty members that were invited in  
23 2022?

24 A: Yes, I know there was at least one.

25 Q: Let's talk about the end of that first semester. Were your  
26 interactions with the students still positive?

1 A: I thought they were! But their course evaluations were not as positive  
2 as I thought they would be.

3 Q: What do you mean?

4 A: I didn't think I had any serious issues with any of my students, but  
5 on December 13, 2022, we got back our student evaluations, and I was  
6 shocked! There were more than handful of evaluations calling me things  
7 like a "drill sergeant." A couple of evaluations said that I was "overly  
8 assertive . . . definitely not maternal" and that I "intentionally  
9 directed conversations to female authors which felt forced."

10 Q: I'm showing you what's been marked as Exhibit 3. Do you recognize  
11 this?

12 A: Yes. These are the student evaluations from my classes in the Fall  
13 of 2022.

14 Q: What happened after you received these evaluations?

15 A: I met with Mark Riley on December 17, 2022. We were scheduled to meet  
16 anyway to touch base on how my first semester went.

17 Q: What did you talk about?

18 A: We talked about the course evaluations, and I raised some concerns  
19 about how students and faculty treated women on campus.

20 Q: Were you able to see which student evaluations were from male cadets  
21 versus female cadets?

22 A: No. The evaluations are anonymous.

23 Q: Did Mark say anything in response to your concern?

24 A: I asked Mark for advice on how to navigate the situation. Mark said  
25 that they've had other female faculty members at this school that  
26 thrived, and I should be able to as well. He said that maybe I should

1 try to be less rigid and go with the flow of things like the other female  
2 faculty members had. He said I might fit in better that way, but to let  
3 him know if it actually became concerning.

4 Q: Did you discuss anything else in your meeting?

5 A: Yes. I asked Mark about assigning me to teach Strategic Thinkers and  
6 Military Intellectuals in the spring semester. It's an upper-level  
7 course and would have really challenged me as an educator, and I had the  
8 combat experience and the degrees to back it up.

9 Q: Were you assigned to teach that class?

10 A: No. Mark said that I needed more experience teaching the base level  
11 courses and at least one semester of operating smoothly with the  
12 students.

13 Q: What else did you discuss?

14 A: Since I was benched from teaching my dream course, I proposed that I  
15 host a day-long seminar called "Ethical Reasoning in Military Conflict"  
16 sometime in the spring. Mark gave me the green light to present it for  
17 approval at the next faculty meeting.

18 Q: I'm going to show you what's been marked as Exhibits 6 and 7. Do you  
19 recognize these?

20 A: Yes. Exhibit 6 is my proposal for the seminar. Exhibit 7 is my faculty  
21 evaluation completed by Mark Riley following that meeting. We must review  
22 it with them, you can see my signature on the last page confirming that  
23 I reviewed it. It was mostly positive, so I was hoping the fall had just  
24 been a bumpy start.

25 Q: When you all returned for the spring semester, did you meet a new  
26 faculty member named Beau Hayes?

1 A: Yea. What a piece of work. Mark hired him towards the end of December  
2 as another Assistant Professor in the Philosophy Department. It was only  
3 the second time that I met Beau when he made his thoughts about me and  
4 other women clear.

5 Q: What do you mean?

6 A: Every January, before the term starts, Westmoor puts on Recognition  
7 Day. It's where the freshmen cadets are recognized as a full-fledged  
8 member of their battalions. Before they get recognized though, they go  
9 through a series of intensive physical exercises, it's kind of like a  
10 final way to show why they deserve a place here. The faculty will all  
11 go out to the field and support the cadets. During the 2023 Recognition  
12 Day, Professor Hayes came up to me and we were watching the cadets for  
13 a while. One of the female cadets accidentally tripped carrying ammo  
14 cans and Hayes said, "Man, this school really went downhill in 1989."  
15 Then, he kind of looked over at me and said, "the same could be said for  
16 faculty." Then he just walked off.

17 Q: How did that make you feel?

18 A: At worst? Really uncomfortable. It at least confirmed for me that  
19 these male faculty members didn't see me as an equal and I wondered if  
20 they would ever treat me as anything other than a woman walking around  
21 on their campus.

22 Q: When was the next time you interacted with the faculty?

23 A: A few days later. We had our first meeting for the spring semester  
24 on January 9, 2023. The first meeting of each semester, everyone attends.  
25 Faculty, department chairs, college presidents, and university  
26 administration. With everyone there, I was a little nervous to pitch my

1 panel. I passed around a copy of my panel proposal, and at first everyone  
2 seemed really interested. I could tell they were intrigued about giving  
3 the cadets exposure to current and former leaders who were faced with  
4 making quick decisions in combat.

5 Q: At some point, did that change?

6 A: Yes. When I started talking about how I wanted to make sure we  
7 proactively invited multiple female leaders to speak, I could tell I  
8 lost them.

9 Q: What do you mean?

10 A: A bunch of the other professors—mostly the senior male faculty  
11 members—started looking down at their phones, one even rolled his eyes  
12 at me, and a couple of the men snickered under their breath and I saw  
13 them start to look around the room at each other and make faces that  
14 looked to me like they were saying, “told you so.”

15 Q: How did you respond?

16 A: I was really frustrated and disappointed. I personally observed and  
17 was the target of several instances of gender discrimination and I didn’t  
18 want to see that continue. I stopped my presentation and took a moment  
19 to address the room.

20 Q: What did you say?

21 A: I told them that Westmoor had an ongoing issue with the way faculty  
22 and staff treated women, especially women in leadership roles. I told  
23 them every example that I had seen or been the recipient of since I  
24 started and called it what it was—gender discrimination.

25 Q: How did the room respond?

26 A: I could feel their anger and resentment. It wasn’t received well, and



1   it felt like I had become an enemy.

2   Q: How did Mark Riley respond?

3   A: Oh, he was mad. I looked over and Mark, who is usually stoic, was red

4   in the face and it looked like his eye was starting to twitch.

5   Q: Let's talk about how the Spring 2023 semester went. Did the students'

6   attitudes toward you improve?

7   A: No, they got worse. When I was doing introductions in my American

8   Political Thought course, one of the male cadets raised his hand and

9   said, "Aren't you that professor we heard has a real axe to grind with

10   Westmoor?" I could tell he was just trying to showboat for his friends,

11   but I still referred him to his battalion command structure for

12   discipline.

13   Q: Did you tell anyone else what happened?

14   A: I mentioned it briefly to Mark Riley when I passed him in the hall

15   about a week later.

16   Q: How were the interactions with students and faculty the rest of the

17   semester?

18   A: It seemed like a quick decline. It started with little comments here

19   and there. In January, a few weeks after classes started, I walked past

20   Professor Carr and a couple of other faculty members when I heard Carr

21   mutter, "here comes the social justice warrior." And some cadets would

22   roll their eyes when I taught on the historical contributions of female

23   philosophers and generally seemed less willing to participate in class

24   than my students from the fall.

25   Q: Did you try to connect socially with colleagues?

26   A: I tried. Ellis was still a good friend to me, but I wanted to connect

1 with other faculty too. I remember joining a faculty lunch early in  
2 February 2023. Everyone was swapping old cadet stories, but when I shared  
3 a story from when I was stationed in Afghanistan—thinking that everyone  
4 loves to hear a good field story, the table went quiet. One professor  
5 just said, "Wow, that's intense," and they turned their backs to me and  
6 kept talking in their own group.

7 Q: Did you have any other faculty interactions in February?

8 A: Yes. The next day, it must have been February 4, 2023, Professor  
9 Keating—he's one of the most senior faculty members, and he was actually  
10 at Westmoor when they began admitting women—pulled me to the side and  
11 told me, "We're lucky to have your perspective." That really made my  
12 day.

13 Q: When was the next faculty meeting?

14 A: February 21, 2023.

15 Q: What happened then?

16 A: Nothing too much, but I remember when I was walking into the meeting,  
17 I heard a tenured mathematics professor tell Beau Hayes that he thought  
18 "it's always the young ones that think they know better and everyone  
19 else should change." Then they both started laughing.

20 Q: Was Mark Riley in the room when you heard that comment?

21 A: Yes. He was standing not too far away. It's possible he heard it, but  
22 I can't be sure.

23 Q: Did you tell Mark about the comment?

24 A: Not at that point. I was trying to keep my head down, work hard, and  
25 hoped that it would get better.

26 Q: Did those comments affect you?

1 A: At first, I tried to brush them off, but over time it built up. And  
2 it was more than just the comments, I felt like an outsider no matter  
3 what I did.

4 Q: Tell me more about your relationship with Mark Riley at this point.

5 A: I honestly didn't see a lot of Mark that semester. He was always  
6 hanging around his old buddies on the faculty, Professor Hayes, or with  
7 his friend Rollins Tucker. But I knew he didn't care for me after  
8 Professor Carr's Memorial Day barbeque.

9 Q: Who is Rollins Tucker?

10 A: Rollins is an Assistant Director in Human Resources at Westmoor. It's  
11 who I ended up reporting all of this too, I just didn't know Rollins and  
12 Mark were childhood friends.

13 Q: I'll come back to that in a moment, but I want to talk about Professor  
14 Carr's barbeque. Were you invited?

15 A: No. Carr hosts this big faculty barbeque at his home over on Florence  
16 Island for Memorial Day every year. He didn't include me.

17 Q: Was every member of the faculty invited?

18 A: No, but it was a lot them. Mark was a regular attendee, and so were  
19 Professor Healy, Keating, Wyatt, McLeod, and Montgomery. But then.  
20 Professor Carr invited Beau Hayes.

21 Q: Was that unusual?

22 A: I had always been told that you don't get invited to Carr's barbeque  
23 until you've been around for a while. But Beau had just started at  
24 Westmoor a few months prior.

25 Q: Do you know about anything that happened at this barbeque?

26 A: I only know about what happened because Ellis felt guilty and told

1 me.

2 Q: What did Ellis tell you?

3 A: Ellis wasn't a part of this conversation, but Ellis overheard a small  
4 group of the faculty talking about how I contributed too many ideas for  
5 being so new to the school and that I kept clashing with the students.  
6 Ellis overheard Mark tell Professor Healy that I was "acting beyond my  
7 rank." Professor Healy responded that "if Louise isn't kept in line,  
8 she'll turn the department into a social justice blog."

9 Q: Did Ellis hear Mark respond?

10 A: Yes. Ellis heard Mark say, "yea, Louise brings combat boots to a  
11 poetry reading. Everything's a fight."

12 Q: Did anyone else say anything?

13 A: Yes. Apparently, Professor Carr said to the group that he didn't  
14 think I would last long at Westmoor.

15 Q: How did hearing about what the faculty members said make you feel?

16 A: Really disappointed and embarrassed. I had a hard time fitting in  
17 from the beginning, but it seemed like I was fighting an uphill battle  
18 at this point.

19 Q: Let's fast forward to the summer of 2023. What were your interactions  
20 like then?

21 A: Thankfully, it was quiet with the cadets gone. But I had a tough  
22 conversation with Mark when I found out that he was assigning Beau Hayes  
23 to teach Strategic Thinkers and Military Intellectuals in the fall. The  
24 class was usually taught by Professor Carr, but Carr was going to take  
25 on a new seminar in the fall and Mark needed to fill the space. I thought  
26 since I had previously asked to teach that class and been there a whole

1 semester ahead of Beau, that I would've been the one selected to fill  
2 Professor Carr's spot.

3 Q: Did you raise that issue with Mark Riley?

4 A: Yes. I asked him why I wasn't selected for that course. Mark said  
5 that I was busy enough with the three courses I was teaching already,  
6 and Beau only had two classes at the time. Mark also said that my  
7 students' course evaluations clearly indicated that I should be focused  
8 on improving my instructional skills before seeking out advanced  
9 opportunities.

10 Q: Did you agree with that?

11 A: No. I had seniority over Beau and previously told Mark that I wanted  
12 to teach that course. I should have been given right of first refusal  
13 and my students' evaluations weren't so extreme as to hold me back from  
14 that opportunity. It didn't feel like any of this was about my skill  
15 level or professional capabilities, it felt like I was being put in my  
16 place.

17 Q: Aside from you starting at Westmoor a semester before Beau Hayes, did  
18 you have more experience than him?

19 A: I can't be totally sure, but isn't having more teaching experience  
20 than him, even by a semester, enough?

21 Q: Did any of your responsibilities change after that semester?

22 A: No.

23 Q: Did you talk to Beau Hayes at all during the summer of 2023?

24 A: I saw him briefly in July 2023 at a department meeting. Now that he  
25 was in with Mark's group, he started acting like he thought he was better  
26 than me. He was condescending during meetings, and I was getting really

1 frustrated. But then after everyone else left the department meeting,  
2 Beau came up to me and whispered, "Look, I'm not saying you're not  
3 qualified, but you're so damn dramatic. Stop trying to change the world  
4 and just teach your little classes. And hey, try throwing in a smile  
5 once in a while. You're welcome." And then he had the nerve to smirk at  
6 me and walk out of the room.

7 Q: Did you tell Mark Riley or anyone else what happened?

8 A: Not at that point. I felt like Beau had Mark in his corner and it  
9 didn't feel like anything would change.

10 Q: When the fall semester began, did anything change?

11 A: The opposite. At cadet orientation in August, Mark introduced me  
12 again as a "little lady" the cadets could look up to. I was so angry. I  
13 had asked him not to describe me that way after he introduced me at  
14 orientation last year.

15 Q: What about your interactions with the faculty in the fall? Did  
16 anything change?

17 A: Nope. It was the same old status quo. Though this year I did learn  
18 from Ellis that there was apparently a big golf weekend where a lot of  
19 the professors would "bond" before the year started, but you had to have  
20 an in to be invited. Ellis didn't seem to think it was a huge deal. But  
21 Ellis was used to how the boys club operated.

22 Q: What were your interactions with your students like during the fall  
23 of 2023?

24 A: I definitely noticed a change from my introductory course students  
25 the year prior. You could tell something was off from the beginning. I  
26 thought maybe it was just me, but then a female cadet approached me

1 after class on September 2nd. She thought that maybe she shouldn't say  
2 anything but wanted me to know that Professor Carr had been openly  
3 telling his students to not sign up for my class unless you wanted to  
4 minor in feminine studies. He was telling them to take Professor Hayes'  
5 class if they wanted a real Westmoor education.

6 Q: What did you feel when you heard that?

7 A: I was furious. Professor Carr had always hated me but disrespecting  
8 me in front of the students . . . that blatantly was going too far. I  
9 went to Mark the next day and told him that this had to stop.

10 Q: How did Mark respond?

11 A: He did seem a little taken aback. He told me that he would talk to  
12 Professor Carr and instruct him not to make further comments.

13 Q: Was that it?

14 A: As far as I know.

15 Q: What were your interactions with the other faculty members like at  
16 the beginning of the Fall 2023 semester?

17 A: I felt like I had been blackballed. No one went out of their way to  
18 talk to me. Everyone seemed to avoid looking at me. The school provided  
19 lunch for the faculty on September 19, 2023, and I tried to make polite  
20 conversation. No one was outwardly rude to me until I was talking to  
21 Ellis about the panel idea I had pitched in the spring. I found a Colonel  
22 who was responsible for exposing combat misconduct and thought they  
23 would be a great resource for this panel. But I guess Professor Healy  
24 overheard me because he chimed in and said, "You mean that snitch? Why  
25 should we listen to any of your friends?"

26 Q: Did you tell Mark about what Professor Healy said?

1 A: No. I didn't even personally know the Colonel I was discussing, but  
2 that didn't seem to matter to Healy either way. If I supported it, he  
3 was against it.

4 Q: Was your panel ever approved?

5 A: Yes. Mark gave me clearance to pitch the panel again, and it was  
6 approved at the next faculty meeting. I submitted the agenda to Mark,  
7 and he told me he would email it out to all cadets. I put up a couple  
8 of flyers for it too. But only a few people ended up coming. I later  
9 learned that Mark never sent out the agenda.

10 Q: Did anything else happen during the Fall 2023 semester?

11 A: Nothing specifically, but a lot of cadets dropped my classes. I  
12 noticed that the ones who didn't or couldn't didn't participate in class.  
13 And it seemed like the only time other faculty spoke to me was when they  
14 had to during a meeting. Particularly Professor Carr and Beau Hayes.  
15 They sneered at me whenever I passed them and if they were together,  
16 they would whisper something to each other before looking up at me and  
17 laughing. It was like being in high school, but worse because this was  
18 my job. I just wanted to do my job.

19 Q: At any point during the fall of 2023, did you raise any other concerns  
20 with Mark Riley?

21 A: No. At that point I knew without a doubt that he wasn't on my side.

22 Q: How did you know that?

23 A: The Thanksgiving dinner. It didn't surprise me that I wasn't invited  
24 this year because I wasn't invited last year, but then Mark invited Beau  
25 Hayes. But Beau seemed to be the cause of a lot of my problems lately,  
26 and he was so smug about being invited.



1 Q: Smug how?

2 A: The Monday after Thanksgiving, I was sitting in the faculty lounge,  
3 alone, drinking my coffee when Beau and Professor Healy came in. They  
4 sat at a table right next to me but pretended like I wasn't even there.  
5 Beau and Professor Healy were talking about how great Mark's Thanksgiving  
6 dinner was, they all went through a bottle of Pappy Van Winkle together.  
7 Good for them. Anyways, Beau was bragging about how he got great facetime  
8 in with Mark and then he fake lowered his voice like he didn't want me  
9 to hear what he was going to say next, but there were only three of us  
10 in there and I know he wanted me to hear him because he looked right at  
11 me and said that "maybe Louise would get invited to these things if she  
12 didn't sound like a left-wing philanthropist all of the damn time. She's  
13 exhausting."

14 Q: Was anyone else in the faculty lounge during that conversation?

15 A: No.

16 Q: Did you tell Mark Riley about what you heard?

17 A: No.

18 Q: When was the next time you spoke with Mark Riley?

19 A: It was on December 19, 2023. I remember because we had just received  
20 our student evaluations. Let's say I wasn't feeling very optimistic  
21 about mine.

22 Q: I'm handing you what's been marked as Exhibit 5. Do you recognize  
23 this?

24 A: Yes. Exhibit 5 includes the evaluations for my Fall 2023 courses.  
25 These were a lot harsher than in previous terms.

26 Q: What do you mean?

1 A: I mean, look right there. One of the students literally called me a  
2 bitch.

3 Q: Did Mark Riley say anything?

4 A: Not about that comment. He just said that it's clear my students view  
5 me as overly harsh and rigid.

6 Q: Did you think that was true?

7 A: Maybe. I was off my game and I'm sure I snapped at a student when  
8 they didn't deserve it a few times. But I don't think they would ever  
9 call Beau, Ellis, or Charlotte a bitch if they had done the same thing.

10 Q: I'm showing you what's marked as Exhibit 8. Do you recognize this?

11 A: Yes. This is my faculty evaluation completed by Mark Riley following  
12 that meeting.

13 Q: Did you and Mark Riley discuss anything else?

14 A: I tried talking to him about how I was feeling. I said that I felt  
15 like no one was taking me seriously and both faculty and students didn't  
16 respect me. I didn't know what to do at this point.

17 Q: What did Mark say?

18 A: He said that based on what he saw in my evaluations and his own  
19 observations of my interactions with faculty members, I had probably  
20 been coming off too harsh and needed more time to adjust to Westmoor's  
21 method. Mark said to pull myself up by my bootstraps, focus on my  
22 original assignments and get back to work.

23 Q: How did his response make you feel?

24 A: At a loss. I felt like almost everyone had turned their back on me.  
25 Especially Mark.

26 Q: What happened after your meeting with Mark Riley?

1 A: A few weeks after that, it must have been New Years Eve because I  
2 remember a friend had come into town for dinner and I was drowning my  
3 sorrows in a few bottles of good wine and a nice steak at Hallway's  
4 Chophouse. That's not important. But at that dinner, I received an email  
5 from Westmoor letting the faculty know that Belmont Hall, which houses  
6 the Philosophy department, would undergo construction during the Spring  
7 2024 semester.

8 Q: Did that affect your office?

9 A: Yes. Almost immediately, I received a follow up email from Mark Riley  
10 that he sent out to all the Philosophy department letting us know that  
11 he would have to reassign our offices to either Calhoun or Hammond Hall  
12 for the Spring 2024 semester. And wouldn't you know it, Beau Hayes and  
13 Professor Carr were assigned to offices right next to Mark's in the  
14 newest building on campus, Calhoun Hall. And I was getting shipped off  
15 to Hammond, the oldest building on campus in the greatest state of  
16 disrepair.

17 Q: Were any other professors assigned to Hammond Hall?

18 A: Yes. Poor Professor Keating. I think because he was so elderly Mark  
19 was trying to get rid of him too. Maybe seven or eight professors from  
20 other departments were reassigned to that building as well.

21 Q: I'm showing you what's marked as Exhibits 9 through 11. Do you  
22 recognize these?

23 A: Yes. Exhibit 9 is the email Westmoor sent out to all faculty  
24 concerning the construction with the email we received from Mark right  
25 after. Exhibit 10 is a map of Westmoor, though maybe not to scale.  
26 Exhibit 11-a is a photo of my original office; 11-b is a photo of my new

1 office in Hammond Hall; 11-C is poor Professor Keating's new office in  
2 Hammond Hall; 11-D is the faculty breakroom in Hammond Hall; Exhibit  
3 11E-G are Mark's, Carr's, and Beau's new offices in Calhoun Hall in that  
4 order.

5 Q: Can you describe Hammond Hall and your new office?

6 A: I think Hammond had been there since 1908. It still had asbestos. The  
7 whole thing smelled like mildew, and the heater was always going in and  
8 out. My new office was right next to a maintenance closet, and the smell  
9 wasn't any better in there. One night, I was grading papers late, a rat  
10 ran underneath my desk, I was freezing because the heater was on the  
11 fritz and there was some loud noise coming from the pipes, and I just  
12 remember thinking that they put me here to remind me where I stood. It  
13 wasn't just an office—it was a message.

14 Q: What impact did that have on your day-to-day work?

15 A: It made everything harder. It felt like every little thing was meant  
16 to isolate me or make me feel like I didn't matter.

17 Q: How did you cope with that?

18 A: I kept telling myself, "You've been through worse—you've been in  
19 combat" and this shouldn't be a big deal. But this was different. It  
20 wasn't about grit; it was about being undermined, day after day for over  
21 a year.

22 Q: What were your interactions with the other Hammond Hall faculty like?

23 A: They were great. We formed a tight bond over our new shared fear of  
24 rats. I wouldn't have made it as long as I did without them.

25 Q: What happened when the Spring 2024 semester began?

26 A: I got an email from Mark letting me know that Professor Wyatt McLeod—

1 he's a tenured faculty member in the department—wasn't going to teach  
2 one of his traditional courses and instead would be taking over my upper-  
3 level American Political Thought class.

4 Q: Were you assigned to any other courses in exchange?

5 A: I was given a second Introduction to Philosophy course, but no upper-  
6 level courses.

7 Q: How did you respond to having that course removed from your schedule?

8 A: Enough was enough. I was going to report what was going on. On January  
9 3, 2024, I sent an email to the human resources reporting account. I  
10 described briefly what was going on and that Mark Riley, in my opinion,  
11 wasn't stepping in to fix these issues.

12 Q: I'm showing you what's marked as Exhibit 12. Do you recognize this?

13 A: Yes. This is the email chain where I made the report. I heard back  
14 from one of the HR employees, Rollins Tucker. I remember it being really  
15 hard to get Rollins to respond, but eventually Rollins did, and we set  
16 a meeting for January 23, 2024.

17 Q: What happened at the meeting?

18 A: I sat down with Rollins, introduced myself and said that I worked in  
19 the philosophy department with Mark Riley. Then, I laid out everything  
20 that had been happening since I started working at Westmoor. I detailed  
21 why I decided to say something at the January 2023 faculty meeting and  
22 everything that happened since including my reassignment to Hammond Hall  
23 and removal from American Political Thought.

24 Q: How did Rollins respond?

25 A: Rollins didn't seem to react one way or another. Rollins seemed pretty  
26 neutral honestly. Rollins took notes of what I was saying and told me

1 human resources would conduct an investigation.

2 Q: What happened after that meeting?

3 A: I felt such a weight lifted off of my chest! Finally, someone was  
4 going to stand up for and Beau would be humbled. I was so excited that  
5 I went to tell Ellis about my meeting.

6 Q: What did Ellis say?

7 A: Ellis seemed nervous for me. Ellis told me that Rollins Tucker and  
8 Mark Riley are old childhood friends—they even graduated around the same  
9 time at Westmoor. Ellis also said that Rollins wasn't the brightest bulb  
10 in the box and was struggling to find work when Mark stepped in and  
11 helped Rollins get a job at Westmoor a few years back.

12 Q: Did you know that Rollins and Mark were friends?

13 A: Absolutely not. I was in disbelief that Rollins didn't tell me when  
14 I started talking about Mark's horrible behavior towards me.

15 Q: Did you contact the human resources director asking for a new  
16 investigator?

17 A: No. I knew then that nothing I did or said was going to fix this  
18 problem at that point, so I stopped trying and started looking for  
19 another job.

20 Q: When did you start looking for another job?

21 A: Around February of 2024. At that point, I just kept my head down and  
22 my mouth shut for the next two months.

23 Q: I'm showing you what's been marked as Exhibit 13. Do you recognize  
24 this?

25 A: Yes. This is the email I received from the Director of Human Resources  
26 following their investigation and attaching their final report.

1 Q: What did the director tell you in that email?

2 A: She let me know that she had conducted a review of Rollins' report  
3 and interview notes and determined that no discrimination had occurred.  
4 But she said I had the opportunity to participate in a mediation with  
5 Mark Riley with a neutral mediator if I wanted too.

6 Q: Did you ultimately schedule a mediation with Mark Riley?

7 A: No. I know that email said it would be a neutral mediator, but she  
8 didn't say who it would be, and given what I just learned about Rollins,  
9 I didn't have confidence that anyone at Westmoor would treat me neutrally  
10 at this point. I just ignored the email and took a new role at the  
11 University of the South.

12 Q: Who did you submit your notice to?

13 A: Mark Riley. I asked for a meeting and told him in person.

14 Q: What did he say?

15 A: He just said that he was happy for me and this sounded like a good  
16 fit.

17

18 [Deposition adjourned.]

19 I, Louise Shepard, have read the foregoing deposition transcript  
20 and hereby affix my signature that the same is true and correct.

21 /s/ Louise Shepard

DEPOSITION OF MARK RILEY

1 Q: Please state your name for the record.

2 A: Mark Thomas Riley.

3 Q: How old are you?

4 A: I'm fifty-eight years old.

5 Q: What do you do for a living?

6 A: I'm a professor and for the past nine years, I've been the Chair of  
7 the Philosophy department at the Westmoor Military Institute.

8 Q: What are some of your responsibilities as a department Chair?

9 A: I provide guidance and administrative oversight for the Philosophy  
10 department. That can include things such as developing curriculum,  
11 assigning faculty to courses, and recommending new faculty for hire.

12 Q: Do you report to anyone?

13 A: Of course. I report to the President of the English and Fine Arts  
14 College within Westmoor. The President leads all of the departments  
15 within the college and has final decision-making power. It's the  
16 President who ultimately must sign off on any new hires or terminations.

17 Q: When did you come to Westmoor?

18 A: I've been a part of Westmoor my whole life. All the men in my family  
19 have been Westmoor men for generations. I enrolled as an undergraduate  
20 in 1985 and obtained my B.A. in English and Political Science in 1989.

21 Q: Isn't that the first year Westmoor began admitting female students?

22 A: Yes.

23 Q: Did you receive any other education?

24 A: Yes. I continued at Westmoor for my master's and doctoral programs.  
25 I was awarded a master's in educational leadership in 1991 and a Ph.D.  
26 in Military History in 1999.



1 Q: Can you describe the Westmoor Military Institute for us?

2 A: Westmoor shapes strong leaders by providing cadets with a military  
3 college education and engaging our cadets in a rigorous and disciplined  
4 academic environment dedicated to excellence. Not at all cadets are  
5 required to serve in the military upon graduation, but we are proud that  
6 around thirty percent of each class earn commissions to become officers  
7 in every branch of U.S. military service. Westmoor isn't for everyone,  
8 but the cadets that graduate from our program do so prepared to take on  
9 the serious challenges that will face them in the real world.

10 Q: What was your time as a cadet at Westmoor like?

11 A: Westmoor made me who I am today. While Westmoor maintains a formal  
12 structure today, it was infinitely more rigid when I was a cadet. There  
13 wasn't any room to be emotional or ask questions. Westmoor highlights  
14 the importance of your chain of command from the moment you step on  
15 campus. All cadets are organized into battalions and then separated into  
16 companies within those battalions. If one thing is true at Westmoor,  
17 it's that you don't challenge command. Ever. My time as a cadet was  
18 formative for me. I learned respect, discipline, accountability, and how  
19 to work as a unit. That isn't to say I didn't take advantage of weekend  
20 leave passes. You can imagine what a set of cadets set loose on Queens  
21 Street on leave will get up to. I keep in regular contact with my  
22 classmates. We grew up together in a way you only do in a place like  
23 this.

24 Q: Is one of those classmates Rollins Tucker?

25 A: Yes. Rollins and I grew up down the block from each other. Our mothers  
26 were in Junior League together and they always roped us in to help during

1 cotillion season. It was exhausting to be around that many mothers and  
2 anxious girls every year. Rollins and I snuck off to the golf course  
3 whenever we could. I was a few years older, so I left for Westmoor before  
4 Rollins, and by the time Rollins enrolled, I was able to make sure  
5 Rollins was assigned to my company and served as Rollins' senior mentor.  
6 We were and are very close.

7 Q: Is it true that you helped Rollins get a job at Westmoor?

8 A: Yes and no. Rollins wasn't the most academically inclined cadet.  
9 Rollins struggled with the course load and graduated with a less-than-  
10 optimal grade point average. After graduation, Rollins bounced around  
11 jobs for a long time. But a few years ago, I guess Rollins decided to  
12 settle down and called me asking if I knew about any job openings at  
13 Westmoor.

14 Q: Did you?

15 A: I did. There was an email to all faculty and staff about an opening  
16 in the human resources department. I told Rollins to apply and then I  
17 called a friend over in that department and asked him to move Rollins'  
18 application to the top of the pile. But Rollins still had to interview  
19 and get the job on their own.

20 Q: We'll come back to Rollins Tucker later. How did you come to know  
21 Louise Shepard?

22 A: We posted the position for an Instructor in the Philosophy department  
23 early in 2022. We needed someone who would teach the entry-level courses  
24 because more cadets were making philosophy their major or minor. When I  
25 reviewed Louise's resume, I was impressed with her academic credentials  
26 and combat experience. I thought the combination of those things made

1 her a great candidate for our courses that balance analyzing  
2 philosophical principles with real-world combat decisions. I invited  
3 Louise to campus for an interview, and she was smart, direct, and  
4 confident. I respected that, and I thought the cadets would respect her  
5 as well.

6 Q: What courses did you assign Louise to teach?

7 A: Louise started at Westmoor in June 2022, which meant her first full  
8 semester would be the fall 2022. Her job description included to two  
9 introductory courses—Introduction to Philosophy and European Literary  
10 Movements—but I was impressed with her during her interview and assigned  
11 her a section of American Political Thought, it's an upper-level course.

12 Q: What were Louise's initial interactions with other faculty members  
13 like?

14 A: At the beginning, it seemed fine to me. Any new faculty member goes  
15 through a sort of test period with the other faculty, and sometimes that  
16 period goes on for a while. I do remember during her first faculty  
17 meeting Carr made some crack about Louise being a drill sergeant, but  
18 Carr is older and has been around longer than even me. The only faculty  
19 member who is more senior than him is Professor Keating. And to be  
20 honest, I think Louise was nervous during that first meeting and in my  
21 opinion, introduced herself abrasively.

22 Q: Did you introduce Louise to the cadets?

23 A: I did. At orientation we introduce all new faculty. When I called  
24 Louise up on stage to introduce her, I did ask the cadets to welcome the  
25 "newest little lady on campus." I didn't mean anything by it. I'm from  
26 a southern culture and that's just the way people spoke when I was

1 growing up and sometimes it slips out. It certainly wasn't the best  
2 phrasing, but I did not mean it in a demeaning way.

3 Q: How did Louise perform during her first semester?

4 A: She had some mixed reviews from her students, but nothing that  
5 concerned me at the time. It was her first semester, and I figured she  
6 was in an adjustment period.

7 Q: I'm showing you what's marked as Exhibits 3 and 7. Do you recognize  
8 these?

9 A: Yes. Exhibit 3 contains some of the student evaluations of Louise  
10 from the fall of 2022. She and I reviewed them together during our end  
11 of semester meeting. Then Exhibit 7 is the faculty evaluation I completed  
12 following Louise's first semester which we both signed.

13 Q: Why didn't it concern you that cadets were commenting on Louise as a  
14 strong woman or too focused on female authors?

15 A: Look, this is a military college. Some of these cadets come in with  
16 genuine beliefs about what women should and should not be able to do,  
17 but most of them know that's outdated and just haven't learned how to  
18 phrase a thought professionally. I told Louise that the cadets can get  
19 defensive and next semester she could try toning down some of the  
20 rigidity and go with the flow. It's the same balance other female faculty  
21 members have had to strike in the past to be successful here. I told her  
22 to come to me if this became concerning.

23 Q: Did you discuss anything else in your meeting?

24 A: Louise asked about teaching Strategic Thinkers and Military  
25 Intellectuals in the spring, but that was a non-starter. That is an  
26 upper-level course. Louise was still learning the ropes and already had

1 one upper-level course in her rotation. I didn't think she was ready to  
2 take on another given the feedback from some of her students, and she  
3 needed more experience.

4 Q: How did Louise respond to that?

5 A: She didn't look happy. I thought she was about to say something to  
6 challenge me, but she just said okay and then asked if she could instead  
7 host a panel on ethical reasoning in military conflict.

8 Q: What did you think about her proposal?

9 A: I thought it was an appropriate middle ground. I gave her to green  
10 light to present the panel for approval at the next faculty meeting.

11 Q: When was that faculty meeting?

12 A: January 9, 2023.

13 Q: What happened at that meeting?

14 A: I went into the meeting and was catching up with Professor Carr about  
15 his winter break and we planned a duck hunting weekend out at his hunting  
16 cabin for the following week. After we got through most of the agenda,  
17 it was Louise's turn to present her panel idea.

18 Q: Did you see anyone in the room act disrespectfully towards Louise  
19 when she was presenting?

20 A: Not at first. I know Louise thinks a bunch of us were ignoring her,  
21 but the truth is that we're just busy. I'll admit that I turned to  
22 answering some emails when she was presenting and could have been paying  
23 better attention, but I wasn't ignoring her.

24 Q: Was there a point where someone was disrespectful?

25 A: That's not how I would characterize it. When Louise completed her  
26 presentation, which is all she had the authority to do in this meeting,

1 she launched into some speech about Westmoor discrimination against  
2 women. She was listing out examples, some of which I heard for the first  
3 time.

4 Q: What did you think when Louise made those statements?

5 A: I was not pleased. Louise stepped beyond the bounds of her approved  
6 topic in the meeting agenda. Talk about circumventing your chain of  
7 command. More importantly, if Louise had this serious of a concern, she  
8 should have come to me first and given me the opportunity to take it up  
9 my own chain of command.

10 Q: When was your next interaction with Louise?

11 A: About a week later, Louise pulled me in the hallway to let me know  
12 that one of the cadets in her class asked her if she was "that lady  
13 professor with a real axe to grind with men."

14 Q: Did you do anything when Louise reported this to you?

15 A: No. Louise told me that she already reported the cadet to their  
16 battalion leader who would address appropriate conduct and reprimand the  
17 cadet.

18 Q: Is it usual to allow a student to reprimand another student?

19 A: At Westmoor it is. It's how we've always done things because it  
20 replicates real world command structure. If there's a violation of the  
21 honor code or some more serious infraction, faculty will step in. But  
22 where appropriate, we allow cadets to learn leadership by handling some  
23 of these smaller infractions on their own.

24 Q: I want to talk about a couple of incidents that took place in February  
25 of 2023. Were you ever aware of a time when Professor Carr said, "here  
26 comes the feminist hour" to Louise?

1 A: No. Louise never said that to me.

2 Q: Were you ever aware of increasing occurrences of cadets rolling their  
3 eyes at Louise when she was teaching?

4 A: No.

5 Q: In February 2023, did you attend any lunches with the rest of the  
6 faculty?

7 A: No. That month I was swamped trying to finish an article on the  
8 military-industrial complex as it applies in American society and didn't  
9 have time for anything else.

10 Q: Let's shift to the end of February. Did you attend the faculty meeting  
11 on February 21, 2023?

12 A: Yes.

13 Q: When did you arrive at the faculty meeting?

14 A: I was the first one there actually.

15 Q: Where were you in the room?

16 A: I was sitting at a table maybe ten or fifteen feet away from the  
17 door.

18 Q: While the other professors were arriving, did you hear Professor  
19 Healy make a comment to Professor Hayes that "it's always the young ones  
20 that think they know better and everyone else should change"?

21 A: Absolutely not. I remember seeing Healy and Hayes talking together  
22 when Louise walked in, and it looked like they were laughing at something  
23 when she walked by, but I didn't hear anything that they said.

24 Q: Did Louise ever tell you that Professor Healy made that comment?

25 A: No. I didn't find out until much later during the investigation  
26 conducted by human resources.

1 Q: What were your interactions like with Louise for the rest of the  
2 Spring 2023 semester?

3 A: Limited. I was in the beginning stages of research for another article  
4 on conspiracies and court revels in the court of Elizabeth I. I guess I  
5 was busy researching and writing that whole term. I had also just hired  
6 and started training a new faculty member, Beau Hayes.

7 Q: Who is Beau Hayes?

8 A: Beau is bright young professor and Westmoor graduate.

9 Q: How did you come to know Beau Hayes?

10 A: I got some additional funding to expand the philosophy department  
11 course offerings and posted a new faculty position with the authorization  
12 of the department President. Beau applied, and I thought his name sounded  
13 familiar because one of my father's classmates and golfing buddies was  
14 named Beau Hayes, so I thought this Beau might be a Beau Hayes the  
15 second. I called Beau in for an interview, and I was really impressed  
16 with him. He was smart, direct, confident, and had a real respect for  
17 authority.

18 Q: When did Beau begin teaching?

19 A: Spring of 2023.

20 Q: What did you assign Beau to teach?

21 A: I started him out with two lower-level courses: Introduction to  
22 Philosophy and World Religions.

23 Q: Did you ever assign Beau to additional courses?

24 A: Yes. Professor Carr taught Strategic Thinkers and Military  
25 Intellectuals every semester, but he was going to focus on building a  
26 new seminar in the fall of 2023. The next in line to teach that course



1 would have been either Louise or Beau. I thought, based on Louise's  
2 courseload, her current feedback from her students, and that Beau had  
3 the lightest course load at that point, Beau was the better choice to  
4 fill that space.

5 Q: Did you ever discuss that choice with Louise?

6 A: Yes, and that's what I told her.

7 Q: When Beau began teaching, what were your first impressions of him as  
8 a professor?

9 A: I thought he was a great fit. A little rough around the edges, but  
10 he fit in with the faculty quickly and the cadets all seemed to respect  
11 him. He could be a little arrogant and he speaks before he thinks,  
12 especially around women.

13 Q: What do you mean?

14 A: Sometime around spring break in 2023, a few of us went to play a  
15 round of golf. We had thrown back a few when the cart girl came by  
16 selling drinks and snacks. She made us all a hell of a water hazard.  
17 When she stopped at our group, Beau walked up and asked her if she was  
18 on the menu. Then he came back over to us with a fresh drink and said,  
19 "Now that's a woman who knows what she's good for."

20 Q: Did you ever observe Beau make inappropriate comments to Louise?

21 A: No.

22 Q: Did Louise ever report comments Beau made to you?

23 A: No.

24 Q: I want to fast forward to Memorial Day weekend of 2023. Were you  
25 present at a barbeque at Professor Carr's house?

26 A: Yes. He hosts that faculty barbeque every year.

1 Q: Does Professor Carr invite all of the faculty members?

2 A: No. There's no way everyone would fit comfortably in his home. Carr

3 only invites faculty members that he's known for years.

4 Q: Wasn't Beau Hayes at that barbeque?

5 A: Yes, that's true.

6 Q: Did you discuss Louise at this barbeque with anyone?

7 A: I did. Louise had been ruffling a lot of feathers, and I guess I

8 started blowing off some steam after a couple of drinks. I know I spoke

9 with Professor Healy about Louise taking action without operating within

10 her command structure, and acting beyond her rank.

11 Q: Did Professor Healy say anything about Louise?

12 A: Yes. Healy said that if Louise wasn't kept in line that she would

13 turn the department into a social justice blog.

14 Q: Did you agree with him?

15 A: No. I thought Louise had a lot of potential to bring value to Westmoor,

16 that's why I wanted to hire her originally. But I had also observed

17 Louise approach most problems like she was being attacked instead of

18 trying to have a conversation. I told Healy that I thought Louise would

19 bring combat boots to a poetry reading and that she made everything a

20 fight.

21 Q: Did you speak with Professor Carr at the barbeque?

22 A: I didn't speak with him directly, but I did hear him say he thought

23 Louise wouldn't last long at Westmoor.

24 Q: Were you aware that Professor Montgomery told Louise about the

25 comments made by you and Professor Healy?

26 A: I wasn't made aware until the human resources investigation.

1 Q: For the remainder of the Spring 2023 semester, did Louise ever bring  
2 any other concerns to your attention?

3 A: No. I noticed she had withdrawn, and I didn't see her socialize with  
4 other faculty members, but she never said anything.

5 Q: Let's talk about the cadet orientation in the Fall of 2023. Did you  
6 introduce Louise to the cadets that year?

7 A: Yes. I introduced all of the philosophy department faculty to the  
8 cadets. Regrettably, I did introduce Louise as a "little lady" again at  
9 orientation. It was a poor choice of words.

10 Q: Throughout the rest of the Fall of 2023, did you become aware of any  
11 other concerns related to Louise?

12 A: Yes. Louise did come to me about an issue with Professor Carr. Louise  
13 believed that Professor Carr was telling his students that they should  
14 switch out of her courses unless they wanted a minor in feminist studies  
15 and instead directing them to Professor Hayes for a "real Westmoor  
16 education." I was appalled. Carr has always been old-fashioned, but we  
17 all understand the importance of maintaining the integrity and respect  
18 of our fellow faculty members in front of the cadets regardless of any  
19 issues that may be happening behind closed doors. It was unacceptable.

20 Q: Did you do anything?

21 A: Yes. I went to speak with Professor Carr that day to address this  
22 immediately. I told Carr that if he had issues with Louise, he needed  
23 to address them with her or with me and the cadets should be kept out  
24 of it. That is basic command structure and respect for authority.

25 Q: Did you believe that had resolved the issue?

26 A: I did. And Louise didn't bring any other issues to my attention.

1 Q: You previously mentioned a panel that Louise pitched. Was that panel  
2 ever approved?

3 A: Yes. I cleared Louise to present her panel again and it was approved  
4 by the faculty in Fall 2023.

5 Q: Did Louise ask you to distribute the panel agenda to the cadets?

6 A: Yes. Unfortunately, I forgot to email the agenda to the cadets in  
7 time.

8 Q: I want to take a moment to talk about the Thanksgiving dinner you  
9 host every year. Can you tell us about that?

10 A: Yes, every year I host a dinner at my private home for a few faculty  
11 members that I know well and respect. It's an opportunity for us to  
12 socialize outside of school.

13 Q: Who did you invite in 2023?

14 A: Professors Healy, Hayes, Carr, Montgomery, Charlotte, Keating, and a  
15 few others from mathematics and the business school.

16 Q: Did you invite Louise?

17 A: No. It seemed to me that tensions between Louise and several  
18 professors were high that semester and this wasn't an event for all  
19 faculty members. I just didn't think anyone, Louise included, would want  
20 to deal with drama on a holiday.

21 Q: Let's turn to the end of the Fall 2023 semester and moving into Spring  
22 2024. When did you receive notice that the Belmont Hall would undergo  
23 construction?

24 A: The same time everyone else did. When the school sent out the email  
25 to all faculty.

26 Q: What did you do when you received that email?

1 A: I understood it would be my responsibility to reassign the faculty  
2 and staff to either Calhoun or Hammond Hall for the Spring 2024 term.

3 Q: How did you decide which building to place each faculty member in?

4 A: I guess I didn't think much about it at all. I just assigned everyone  
5 randomly.

6 Q: Did any other changes occur for the Spring 2024 semester?

7 A: Yes. Professor McLeod informed me that he was interested in teaching  
8 American Political thought again. Professor McLeod is a respected and  
9 tenured faculty member, though he had not taught that course in several  
10 years. But Professor McLeod was coming back from sabbatical and asked  
11 me if he could come back to teaching APT. As a professor with significant  
12 seniority, I felt that it was only right to assign Professor McLeod. It  
13 did mean that Louise would then be teaching two sections of Intro to  
14 Logic and one European Literary Movements course that semester.

15 Q: You've mentioned a human resources investigation several times. When  
16 did you become aware of your involvement in an investigation?

17 A: I received a text message from Rollins Tucker on January 23, 2024,  
18 letting me know that Louise had filed a formal complaint with his  
19 department.

20 Q: I'm showing you what's been marked as Exhibit 14. Do you recognize  
21 this?

22 A: This is a text Rollins sent me letting me know that Louise had  
23 submitted a formal complaint.

24 Q: Did you meet with Rollins concerning Louise's complaint?

25 A: Yes. And I told Rollins everything that I've told you today. After I  
26 met with Rollins, I never heard anything else about the investigation

1 and right after that is when Louise put in her notice of resignation.

2 Q: How did you respond when Louise informed you she would be leaving  
3 Westmoor?

4 A: I was happy for her. The University of the South seemed like a great  
5 fit for Louise.

6

7 [Deposition adjourned.]

8 I, Mark Riley, have read the foregoing deposition transcript and  
9 hereby affix my signature that the same is true and correct.

10

/s/ Mark Riley

DEPOSITION OF ROLLINS TUCKER

1 Q: Please state your name for the record.

2 A: Rollins Kennedy Tucker.

3 Q: Where are you employed?

4 A: I am one of two Assistant Directors of Human Resources at Westmoor  
5 Military Institute.

6 Q: How long have you worked at Westmoor?

7 A: Close to seven years now. I joined in 2018.

8 Q: What led you to Westmoor?

9 A: I attended Westmoor as a cadet from 1989 through 1995.

10 Q: Is that five years?

11 A: Yea, academics isn't my calling. I failed a few classes and had to  
12 stick around for an extra year to graduate. But I eventually did graduate  
13 with a B.A. in Communications.

14 Q: What did you do after you graduated from Westmoor?

15 A: Hopped around a bit. I never liked staying in one place for long. We  
16 only have one life, and it should be an adventure. I've been a car  
17 salesman, a bosun, I worked at a zoo in Thailand for a while, I've been  
18 a line cook, and even a caddy on the PGA tour.

19 Q: It seems like you've worked a lot of odd jobs?

20 A: Yes, and I have a lot of good stories to tell.

21 Q: So how did you end up working in human resources?

22 A: Well, my parents are getting older and needed someone to come back  
23 home and look after them. I guess I always knew I would eventually have  
24 to settle down. I just never thought it would be at the young age of  
25 fifty-four! Anyways, when I was heading back to town, I started looking  
26 through the classifieds but then I remembered Mark Riley made it as a

1 big shot at our alma mater. I reached out to him to see if he knew about  
2 any job openings.

3 Q: Did he?

4 A: Yes. He told me about an open position in the human resources  
5 department.

6 Q: How do you know Mark Riley?

7 A: Mark is like an older brother to me. We grew up together, our moms  
8 were close friends, and we even got to attend WMI together for a year.  
9 Mark was my senior mentor and always made sure I kept on the straight  
10 and narrow.

11 Q: What role in human resources did you apply for?

12 A: I applied to be a human resources coordinator. The coordinator  
13 position really felt like a social calendar organizer. Coordinators  
14 would organize monthly exercise challenges, staff lunches, human  
15 resources training, and things like that.

16 Q: Were you hired as a coordinator?

17 A: No. I came for an interview with the human resources Director, and  
18 we connected immediately. I'm what they call a real "personality hire"  
19 so it's easy for me to connect with anyone. After my interview, I got a  
20 call a few days later from the Director saying that based on my interview  
21 and a faculty recommendation, she was offering me the role of Assistant  
22 Director.

23 Q: What does an Assistant Director do?

24 A: I handle a range of employment matters. I conduct new employee  
25 onboarding, manage employee benefits, and investigate workplace  
26 complaints.



1 Q: When you are onboarding a new employee, do you provide any training?

2 A: Yes. We provide day-long training for faculty and staff members to

3 walk through school policies and procedures and provide them with their

4 benefit information.

5 Q: Do you educate new employees on Westmoor's anti-harassment and anti-

6 discrimination policies?

7 A: Sure. We do that by providing employees with the link to the human

8 resources library where they can go to find that sort of information.

9 Q: I'm showing you what's marked as Exhibits 1 and 2. Do you recognize

10 these?

11 A: Yes. Exhibit 1 is the human resources document library and Exhibit 2

12 is Westmoor's discrimination and harassment policy.

13 Q: Do you handle allegations of discrimination?

14 A: Yes. Myself, the Director, and the other Assistant Director work to

15 intake and investigate any complaints or allegations of discrimination

16 or harassment.

17 Q: How do you become aware of a complaint for discrimination or

18 harassment?

19 A: We have a general email address for Human Resources where employees

20 can submit any concerns. It's hr@westmoor.edu and we provide our

21 employees with that email address during their orientation. The three

22 of us have access to that email account, and we all regularly monitor

23 the account for incoming emails.

24 Q: How do you decide which one of you investigates a particular

25 complaint?

26 A: It's whoever opens the email in the inbox first.

1 Q: Were you the one who reviewed the email from Louise Shepard on January  
2 3, 2024?

3 A: Yes. We were really busy in January with the start of the semester  
4 and coordinating training for the contractors conducting work on Belmont  
5 Hall during Spring 2024. I got around to Louise's email on January 10th  
6 and requested that she propose meeting times.

7 Q: I'm showing you what's been marked as Exhibit 12. Do you recognize  
8 this?

9 A: Yes. This is the email chain between Louise and the general human  
10 resources email that I responded from to find a time for us to meet.

11 Q: Were you concerned that one of the people Louise complained about was  
12 Mark Riley?

13 A: No, of course not. I treat every investigation the same.

14 Q: If you were concerned, could you recuse yourself?

15 A: Yes. But I wasn't concerned at all. All investigations are conducted  
16 the same way.

17 Q: How do you investigate a discrimination complaint made by an employee?

18 A: First, I meet with the employee to get a full account of any and all  
19 concerns that they have and make a detailed timeline of any reported  
20 events. Then, depending on the complaint, I'll interview all relevant  
21 employees that will help our office determine if discriminatory conduct  
22 actually happened.

23 Q: Have you had an opportunity to review the deposition testimony of  
24 Louise Shepard?

25 A: Yes.

26 Q: Are all the events that Louise referred to in her testimony, events

1 that she reported to you during your meeting on January 23, 2024?

2 A: Yes. She made a thorough report and explained why she believed that  
3 she was being retaliated against for opposing—allegedly—Westmoor’s  
4 gender discrimination. Louise said it wasn’t just the remarks made by  
5 faculty members, but her office and course load reassignments that  
6 concerned her.

7 Q: What were your initial thoughts on Louise’s report?

8 A: I get why she might have been offended or felt isolated by some of  
9 the comments. But Louise is a combat veteran and all of a sudden she  
10 can’t handle some light jabs? It didn’t make sense to me and seemed more  
11 like she was angry that she didn’t always get her way and that Professor  
12 Hayes was assigned to a course that she wanted.

13 Q: I’m showing you what’s been marked as Exhibit 14. Do you recognize  
14 this?

15 A: Yes. This is the text message I sent Mark letting him know an  
16 investigation involving him was being conducted.

17 Q: Is it normal to text an employee to notify them about an  
18 investigation?

19 A: I haven’t done it before, but it didn’t break a rule or anything. I  
20 text Mark regularly, so it was easy to send him a quick text and let  
21 him know.

22 Q: What next steps did you take in your investigation?

23 A: Well, the next step would be to collect relevant documentation which  
24 I detailed in my report. Q: I’m showing you what’s been marked as Exhibit  
25 13. Do you recognize it?

26 A: Yes. That’s the final email our department sent to Louise concerning

1 the investigation and that email attaches the report I completed.

2 Q: Who was the first person you interviewed?

3 A: Mark Riley.

4 Q: What did you discuss?

5 A: Mark confirmed Louise's course assignments, provided me with Louise's

6 faculty reviews and student evaluations, and affirmed his knowledge of:

7 the "drill sergeant" comment made by Carr, his own reference to Louise

8 as a little lady, Louise's outburst at the January 2023 faculty meeting,

9 the cadet comment about Louise being "that professor with a real axe to

10 grind with Westmoor", his discussion with Louise confirming the decision

11 to place Professor Hayes in the Strategic Thinkers and Military

12 Intellectuals course due to the need for an enforcer, the Memorial Day

13 barbeque, and Louise's concerns about Professor Carr diverting students

14 away from her classes.

15 Q: Did you think that based on what Mark Riley told you, he should have

16 stepped in?

17 A: No. I think that may have even made things worse. And, none of the

18 comments Louise heard impacted her ability to do her job.

19 Q: Did you discuss the office reassignments with Mark?

20 A: Yes. Mark explained to me that he randomly assigned the faculty to

21 the offices across Calhoun and Hammond Halls.

22 Q: What about the class assignments?

23 A: Same there. Mark had a valid reason for changing Louise's course

24 load—Professor McLeod had seniority, and Louise needed more time to get

25 up to speed.

26 Q: Did you interview anyone else?

1 A: Yes. I interviewed Ellis Montgomery.

2 Q: Anyone else?

3 A: No. Those were the only relevant individuals.

4 Q: After you completed your interviews and document review, what else  
5 did you do?

6 A: I prepared a report documenting my investigation and conclusion which  
7 I then submitted to my supervisor, the Director of Human Resources, for  
8 review.

9 Q: What was the outcome of the investigation?

10 A: The HR Director reviewed my report and determined that no policy  
11 violations were found. We still offered Louise the option of mediation  
12 with Mark Riley, but she never responded to that offer.

13 [Deposition adjourned.]

14 I, Rollins Tucker, have read the foregoing deposition transcript  
15 and hereby affix my signature that the same is true and correct.

16 /s/ Rollins Tucker

DEPOSITION OF ELLIS MONTGOMERY

1 Q: Please state your name for the record

2 A: Ellis Morgan Montgomery.

3 Q: Where are you employed?

4 A: I'm a Professor of Biology and Chemistry at the Westmoor Military  
5 Institute.

6 Q: How long have you been at Westmoor?

7 A: This year is my thirteenth year. I came to Westmoor after working as  
8 a trauma surgeon in Seattle. I wanted a change of pace and a chance to  
9 see the sun more often. I moved my parents down with me last year.

10 Q: Do you have any experience working with the military?

11 A: Does residency count? I'm kidding. No, I've never been a member of  
12 our armed forces, but that doesn't mean I don't like working in an  
13 organized, efficient, and challenging environment. That's one of the  
14 things that drew me to Westmoor, they demanded greatness.

15 Q: How would you describe the culture at Westmoor?

16 A: It's traditional. That's a kind way to put it. Westmoor's has been  
17 around since the 1830s, and it doesn't seem like a lot has changed since  
18 then. It was a culture shock coming from Seattle. Westmoor is what you  
19 would call a boys' club. The men protect and promote their own.

20 Q: How did you come to know Louise Shepard?

21 A: Louise joined the philosophy department in 2022, and we connected  
22 quickly over our love of Taylor Swift-please don't tell anyone at  
23 Westmoor that I'm a Swiftie, it'll kill my reputation. Louise was sharp,  
24 dedicated, and passionate. You could see immediately that she cared and  
25 was a true academic. Her priority was always the students.

26 Q: Do you mean cadets?

1 A: Oh, right!

2 Q: What did you observe about Louise's initial interactions with other  
3 faculty members?

4 A: Louise had a hard time fitting in. There seemed to be something about  
5 her-I'm not sure what-that rubbed people the wrong way. It didn't help  
6 when Mark introduced her at her first faculty meeting and Carr called  
7 her a "drill sergeant."

8 Q: How would you describe your interactions with Mark Riley?

9 A: Limited. Every now and then I'll join that group on the golf course  
10 and I'll attend Mark's Thanksgiving dinner and Carr's Memorial Day  
11 barbeque. But I have my own life outside of school and spend time with  
12 my friends and family.

13 Q: Have you had any negative interactions with Mark Riley?

14 A: Not personally. Mark has always been polite to me and made me feel  
15 welcome when I joined Westmoor. But Mark isn't the warm and fuzzy type.  
16 He's strictly business and all about chain of command.

17 Q: Have you had any negative interactions with Professor Carr?

18 A: No. But I don't know how I've escaped him. That guy is a real problem.

19 Q: What do you mean?

20 A: Whether or not all of the male faculty members believe in equality,  
21 most of them know how to play ball and keep any inappropriate or old  
22 school comments to themselves. But not Carr. A few years back, I once  
23 saw Carr comment on a receptionist's skirt as "impressively fit to form."  
24 She was clearly uncomfortable and walked away as quickly as possible.

25 Q: Did you ever report that interaction to the school?

26 A: No, but Carr's behavior wasn't exactly a secret.

1 Q: Did you ever observe any other faculty members at Westmoor treat  
2 female faculty members differently than males?

3 A: I'm sure there are more than I can think of right now. But it happens.  
4 And it's not just about men versus women, it's about rank. But I have  
5 seen men advance faster than women with better credentials.

6 Q: Did you observe any of those issues directed towards Louise?

7 A: Yes. At the cadet orientation in 2022 and 2023, I saw Mark introduce  
8 Louise as "the newest little lady on campus." I don't think Mark meant  
9 any harm, but it was uncomfortable even for me. There was a lot more,  
10 but that's where it started.

11 Q: I want to ask you about the Thanksgiving dinner hosted by Mark Riley  
12 every year. Do you regularly attend that dinner?

13 A: Yes. It took a couple of years to receive an invitation but now I'm  
14 a regular.

15 Q: Let's talk about the faculty meeting on January 9, 2023. What happened  
16 during that meeting?

17 A: Louise made an excellent pitch for a panel discussion on ethical  
18 decision making during military conflicts. You could tell how much time  
19 and energy Louise had put into the presentation, and I was really excited  
20 about the topic. I voted for it to move forward. But you could feel a  
21 clear shift in the room when Louise got to the portion of her  
22 presentation about inviting several female military leaders to lead the  
23 discussion. My fellow faculty members put their heads down or turned  
24 towards their laptops and clearly were no longer paying attention.

25 Q: How did Louise respond?

26 A: I think she was pretty frustrated. I could hear the tension in her



1 voice and saw her take a few deep breaths. Then she paused and launched  
2 into a speech about Westmoor's history of disparate treatment towards  
3 females in positions of authority. Mark was pissed. I've never seen him  
4 so angry.

5 Q: Did you agree with Louise's statement?

6 A: Of course, I did because it's true. But I would have gone about it  
7 differently. There's no winning when you make all of them feel attacked  
8 at once.

9 Q: I want to discuss a conversation that took place at Professor Carr's  
10 Memorial Day barbecue in 2023. Who was present at the barbeque?

11 A: A good number of faculty members across all departments were there.  
12 Maybe thirty or forty people. That included Mark Riley, Beau Hayes,  
13 Professor Keating, and Professor Wyatt.

14 Q: Of those thirty or forty people, how many were women?

15 A: Around six or seven.

16 Q: At some point during the barbeque, did you overhear a conversation  
17 about Louise?

18 A: Yes. Mark and Professor Healy were talking about the times Louise had  
19 been speaking up about issues or ideas on campus. Mark told Healy that  
20 Mark thought Louise had "been acting beyond her rank." Healy responded  
21 and said that "if Louise isn't kept in line, she'll turn the department  
22 into a social justice blog."

23 Q: Did Mark respond?

24 A: Yes. Mark said, "yea, Louise brings combat boots to a poetry reading.  
25 Everything's a fight." That's when Professor Carr joined in.

26 Q: What did Professor Car say?

1 A: Carr said that he didn't think Louise would last long at Westmoor.

2 Q: How did you feel after hearing this conversation?

3 A: Awkward. It wasn't necessarily surprising from Healy and Carr, but I

4 was surprised that Mark joined in like that. I hadn't ever heard him say

5 something that negative about a person before.

6 Q: Did you report this conversation to anyone?

7 A: I didn't. This wasn't my fight. But I did tell Louise about what I

8 overheard so that she could decide whatever was best for her.

9 Q: A moment ago, you mentioned Beau Hayes. What were your interactions

10 with Beau Hayes like?

11 A: Beau's a piece of work. He must've sweet talked his way through his

12 interview because he hasn't been shy about his feelings about how great

13 he thought he was and where he thought women stood. He would make these

14 random comments about men's superior leadership skills and how much he

15 valued his wife because she knew it was her role in their marriage to

16 stay home and raise the kids. He reminded me of Professor Carr actually.

17 And then I saw the two of them become friends and was really concerned.

18 Q: Why were you concerned?

19 A: For the same reason that I've seen all of the boys have each other's

20 backs during my tenure at Westmoor, and Carr held a key to the boy's

21 club. Louise just couldn't win for losing.

22 Q: I want to ask you about the office relocations that occurred in Spring

23 2024. Was your office relocated?

24 A: No. My office is in Founder's Hall so it wasn't affected.

25 Q: Are you familiar with Hammond Hall?

26 A: Only from a distance. I'm not crazy enough to go in there, I value

1 my health. It's one of the oldest buildings on campus. I hear all of the  
2 time about mold remediation, heating and cooling problems, and Louise  
3 even told me about a rat that nearly crawled across her foot when she  
4 was there.

5 Q: Are you aware of the human resources complaint Louise submitted?

6 A: Yes. She came and told me about it after her initial meeting with  
7 human resources. Louise seemed excited, but when I heard her meeting was  
8 with Rollins Tucker, I knew her complaint wouldn't go anywhere.

9 Q: Why?

10 A: I guess Louise didn't know this at the time, but I remembered one  
11 time Mark mentioned his old friend Rollins when we were commiserating  
12 over our junior league mothers. Mark told me that he and Rollins were  
13 even at Westmoor at the same time for a while and Mark said he always  
14 made sure Rollins kept his head on straight. Mark talked about Rollins  
15 like Mark was Rollins' older brother. They're still very close and will  
16 go golfing and hunting together.

17 Q: Do you personally know Rollins Tucker?

18 A: Not well. We've met maybe once or twice, and Rollins interviewed me  
19 after Louise made her complaint. I answered all of Rollins' questions.

20

21 [Deposition adjourned.]

22 I, Ellis Montgomery, have read the foregoing deposition transcript  
23 and hereby affix my signature that the same is true and correct.

24 /s/ Ellis Montgomery



## Human Resources Library Index

A guide to employee policies, forms, and community resources. This exhibit includes both formal HR materials and cultural resources available to staff.

<a href="#"><u>Academic Accommodations Policy 2022</u></a>	<a href="#"><u>Bereavement Leave Policy (General - Staff)</u></a>	<a href="#"><u>Free Coffee Locations Map (Founders Hall)</u></a>
<a href="#"><u>Academic Accommodations Policy (FINAL)</u></a>	<a href="#"><u>Bereavement Leave Policy (General - Faculty)</u></a>	<a href="#"><u>Free Coffee Locations Map (Calhoun Hall)</u></a>
<a href="#"><u>Academic Accommodations Policy (2020)</u></a>	<a href="#"><u>Bike to Work Program Proposal</u></a>	<a href="#"><u>Free Coffee Locations Map (Belmont Hall)</u></a>
<a href="#"><u>Accident Reporting Procedures</u></a>	<a href="#"><u>Bike to Work Program (Health Benefits)</u></a>	<a href="#"><u>Fun Things To Do in Gulfport (Queens Street)</u></a>
<a href="#"><u>Accident Reporting Procedures (Bicycles)</u></a>	<a href="#"><u>Bike to Work Program (Making Connections)</u></a>	<a href="#"><u>Fun Things To Do in Gulfport (Safety Guide)</u></a>
<a href="#"><u>Accident Reporting Procedures (Rec Day)</u></a>	<a href="#"><u>Bike to Work Program (Helmet Safety)</u></a>	<a href="#"><u>Fun Things To Do in Gulfport (Alcohol Education)</u></a>
<a href="#"><u>Accident Reporting Procedures (Field Trip)</u></a>	<a href="#"><u>Bike to Work Program (Tire Change Stations)</u></a>	<a href="#"><u>Fun Things To Do in Gulfport (Bike Paths)</u></a>
<a href="#"><u>Accident Reporting Procedures (Leave Pass)</u></a>	<a href="#"><u>Bike to Work Program (Bike Paths)</u></a>	<a href="#"><u>Fun Things To Do in Gulfport (BBQ)</u></a>
<a href="#"><u>Accident Reporting Procedures (PT)</u></a>	<a href="#"><u>Campus Accessibility Map/Policy</u></a>	<a href="#"><u>Golf Tournament Registration Form (Spring 2022)</u></a>
<a href="#"><u>Address Change Form (General)</u></a>	<a href="#"><u>Campus Accessibility Map (E-bike Paths)</u></a>	<a href="#"><u>Golf Tournament Registration Form (Spring 2023)</u></a>
<a href="#"><u>Address Change Form (Faculty)</u></a>	<a href="#"><u>Campus Accessibility Map (ADA Compliance)</u></a>	<a href="#"><u>Golf Tournament Registration Form (Spring 2024)</u></a>
<a href="#"><u>Address Change Form (Student)</u></a>	<a href="#"><u>Campus Dining Guide (Cadets)</u></a>	<a href="#"><u>Golf Tournament Proposal Form</u></a>
<a href="#"><u>Alcohol and Substance Use Policy (On-Campus)</u></a>	<a href="#"><u>Campus Dining Guide (Employee Rates)</u></a>	<a href="#"><u>Golf Tournament Registration Form (v39)</u></a>
<a href="#"><u>Alcohol and Substance Use Policy (Off-Campus)</u></a>	<a href="#"><u>Campus Dining Guide (Off-Campus Dining)</u></a>	<a href="#"><u>Green Campus Initiatives</u></a>
<a href="#"><u>Annual Benefits</u></a>	<a href="#"><u>Campus Dining Guide (Employee Discounts Off-Campus)</u></a>	<a href="#"><u>HR Contact Directory</u></a>
<a href="#"><u>Annual Benefits Enrollment Guide</u></a>	<a href="#"><u>Campus Dining Guide (Rewards Program)</u></a>	<a href="#"><u>HR Contact Directory</u></a>
<a href="#"><u>Annual Benefits Enrollment Guide (Health Wellness Opportunities)</u></a>	<a href="#"><u>Career Development Toolkit (Instructors)</u></a>	<a href="#"><u>Health and Safety Manual</u></a>
<a href="#"><u>Annual Performance Review Process (Faculty)</u></a>	<a href="#"><u>Career Development Toolkit (Adjuncts)</u></a>	<a href="#"><u>Health and Safety Manual (Wellness Walks)</u></a>
<a href="#"><u>Annual Performance Review Process (Staff)</u></a>	<a href="#"><u>Career Development Toolkit (Assistant Professors)</u></a>	<a href="#"><u>Health and Safety Manual (Wellness Initiatives)</u></a>
<a href="#"><u>Annual Performance Review Process (Dept. Chairs)</u></a>	<a href="#"><u>Career Development Toolkit (Associate Professors)</u></a>	<a href="#"><u>Health and Safety Manual (Proposals)</u></a>
<a href="#"><u>Annual Performance Review Process (Report Submission)</u></a>	<a href="#"><u>Childcare Center Information</u></a>	<a href="#"><u>Hiring and Recruitment Guidelines</u></a>
<a href="#"><u>Annual Performance Review Process (Considerations)</u></a>	<a href="#"><u>Childcare Center Information (Enrollment)</u></a>	<a href="#"><u>Hiring and Recruitment Guidelines (Dept. Chairs)</u></a>
<a href="#"><u>Applicant Tracking System Guide</u></a>	<a href="#"><u>Childcare Center Information (Pickup times)</u></a>	<a href="#"><u>Hiring and Recruitment Guidelines (Presidents)</u></a>
<a href="#"><u>Applicant Tracking System Guide (Hired)</u></a>	<a href="#"><u>Childcare Center Information (Rates)</u></a>	<a href="#"><u>Hiring and Recruitment Guidelines (Professors)</u></a>

<a href="#"><u>Applicant Tracking System Guide (Qualifications)</u></a>	<a href="#"><u>Childcare Center Information (Bikes &amp; Tricycles)</u></a>	<a href="#"><u>Hiring and Recruitment Guidelines (Staff)</u></a>
<a href="#"><u>Applicant Tracking System Guide (Procedures)</u></a>	<a href="#"><u>Code of Conduct - General</u></a>	<a href="#"><u>Holiday Schedule (Christmas)</u></a>
<a href="#"><u>Approved Vendor List</u></a>	<a href="#"><u>Code of Conduct (1989)</u></a>	<a href="#"><u>Holiday Schedule (Easter)</u></a>
<a href="#"><u>Approved Vendor List</u></a>	<a href="#"><u>Code of Conduct (Battalions)</u></a>	<a href="#"><u>Holiday Schedule (Thanksgiving)</u></a>
<a href="#"><u>Approved Vendor List (Panels)</u></a>	<a href="#"><u>Code of Conduct (Companies)</u></a>	<a href="#"><u>Holiday Schedule (Memorial Day)</u></a>
<a href="#"><u>Approved Vendor List (Faculty Meetings)</u></a>	<a href="#"><u>Code of Conduct (Classroom)</u></a>	<a href="#"><u>Holiday Schedule (Veterans Day)</u></a>
<a href="#"><u>Approved Vendor List (Student Organizations)</u></a>	<a href="#"><u>Community Service</u></a>	<a href="#"><u>IT Help Desk Contact Information</u></a>
<a href="#"><u>Approved Vendor List (Bike Club Meetings)</u></a>	<a href="#"><u>Community Service Goals</u></a>	<a href="#"><u>IT Help Desk FAQs</u></a>
<a href="#"><u>Art on Campus Map (Calhoun)</u></a>	<a href="#"><u>Community Service Vendors</u></a>	<a href="#"><u>IT Help Desk Quick Tasks</u></a>
<a href="#"><u>Art on Campus Map (Emerson)</u></a>	<a href="#"><u>Community Service (Requirements)</u></a>	<a href="#"><u>IT Help Desk FAQ (How to Help Yourself)</u></a>
<a href="#"><u>Art on Campus Map (Hammond)</u></a>	<a href="#"><u>Community Service Leave Policy</u></a>	<a href="#"><u>IT Help Desk (Requesting Repairs)</u></a>
<a href="#"><u>Art on Campus Map (Belmont)</u></a>	<a href="#"><u>Complaint and Grievance Procedures</u></a>	<a href="#"><u>Job Classification Guide</u></a>
<a href="#"><u>Art on Campus Map (Founders)</u></a>	<a href="#"><u>Conflict of Interest Policy</u></a>	<a href="#"><u>Job Classification Guide (Tenure)</u></a>
<a href="#"><u>Art on Campus Map (v11)</u></a>	<a href="#"><u>Cybersecurity Awareness Guide</u></a>	<a href="#"><u>Job Classification Guide (Staff Advancement)</u></a>
<a href="#"><u>Assistance for First-Generation Faculty</u></a>	<a href="#"><u>Cybersecurity Awareness Guide (v.2)</u></a>	<a href="#"><u>Job Classification Guide (Organizational Structure Map)</u></a>
<a href="#"><u>Athletic Event Discount Tickets</u></a>	<a href="#"><u>Alcohol and Substance Use Policy (While Biking)</u></a>	<a href="#"><u>Leadership Development Program</u></a>
<a href="#"><u>Athletic Event Discount Concessions</u></a>	<a href="#"><u>Diversity and Inclusion Training (1989)</u></a>	<a href="#"><u>Leadership Development Program (Cadet Development Initiatives)</u></a>
<a href="#"><u>Athletic Event-Approved Vendors</u></a>	<a href="#"><u>Diversity and Inclusion Training (2007)</u></a>	<a href="#"><u>Leadership Development Program (Panel Proposals)</u></a>
<a href="#"><u>Athletic Events - Bike Club</u></a>	<a href="#"><u>Diversity and Inclusion Training (2020)</u></a>	<a href="#"><u>Leadership Development Program (First Generation Faculty)</u></a>
<a href="#"><u>Athletic Event Discount Tickets (Stadium)</u></a>	<a href="#"><u>Discrimination and Harassment Policy</u></a>	<a href="#"><u>Learning Management System (LMS)</u></a>
<a href="#"><u>Athletic Event Discount Tickets (Arena)</u></a>	<a href="#"><u>Diversity and Inclusion Training (v28)</u></a>	<a href="#"><u>Library Resources for Faculty</u></a>
<a href="#"><u>Attendance Policy Cadets</u></a>	<a href="#"><u>Domestic Travel Policy</u></a>	<a href="#"><u>Library Resources for Staff</u></a>
<a href="#"><u>Attendance Policy (Staff)</u></a>	<a href="#"><u>National Travel Policy</u></a>	<a href="#"><u>Library Resources for Interns</u></a>
<a href="#"><u>Attendance Policy (Faculty)</u></a>	<a href="#"><u>Domestic Travel Policy (Reimbursements)</u></a>	<a href="#"><u>Mental Health Resources</u></a>
<a href="#"><u>Attendance Policy (Leave Reports)</u></a>	<a href="#"><u>Domestic Travel Policy (Approved Hotels)</u></a>	<a href="#"><u>New Employee Onboarding Checklist</u></a>
<a href="#"><u>Attendance Policy (Academic Probation)</u></a>	<a href="#"><u>Domestic Travel Policy (Pre-Payments)</u></a>	<a href="#"><u>Office Desk Chair Racing Rules</u></a>
<a href="#"><u>Attendance Policy (Bereavement)</u></a>	<a href="#"><u>Emergency Contact Update Form</u></a>	<a href="#"><u>Office Prank Guidelines (Safe &amp; Fun)</u></a>
<a href="#"><u>Awards and Recognition Program</u></a>	<a href="#"><u>Emergency Contact Update Form 2</u></a>	<a href="#"><u>Open Enrollment FAQ</u></a>
<a href="#"><u>Babysitting Referral List</u></a>	<a href="#"><u>Mandatory Training Modules List</u></a>	<a href="#"><u>Parking Permit Application</u></a>
<a href="#"><u>Bereavement Leave Policy</u></a>	<a href="#"><u>Payroll Calendar</u></a>	<a href="#"><u>Remote Work Policy</u></a>
<a href="#"><u>Employee Assistance Program (EAP)</u></a>	<a href="#"><u>Performance Improvement Plan Template</u></a>	<a href="#"><u>Retirement Plan Overview</u></a>
<a href="#"><u>Employee Assistance Program (EAP) (v31)</u></a>	<a href="#"><u>Pregnancy Accommodation Policy</u></a>	<a href="#"><u>Salary Bands and Compensation Guide</u></a>
<a href="#"><u>Employee Bike Rental Program (EBRP)</u></a>	<a href="#"><u>Professional Development Funds Policy</u></a>	<a href="#"><u>Service Anniversary Awards</u></a>

[LinkedIn Learning Portal \(Profile Creation\)](#)  
[LinkedIn Learning Portal \(Recruiting\)](#)  
[Faculty & Staff Social Calendar \(v33\)](#)  
[Family and Medical Leave Act \(FMLA-What to do after a Biking Accident\)](#)  
[Family and Medical Leave Act \(FMLA\) Guide \(v34\)](#)

[Public Speaking Resources](#)  
[Family and Medical Leave Act \(FMLA\) Guide \(v34\)](#)  
[From Here to There: Biking as a Way of Life](#)  
[Financial Wellness Resources](#)  
[Financial Wellness Resources \(v35\)](#)

[Social Media Policy](#)  
[Staff Lounge Reservation Form](#)  
[Student Complaint Escalation Procedure](#)  
[Financial Wellness Resources \(v35\)](#)  
[Family and Medical Leave Act \(FMLA\) Guide \(v34\)](#)



## EXHIBIT 2

### Anti-Harassment Policy

Effective Date: August 2007

Reviewed: August 2015 (minor language amendments, no substantive changes)

Purpose: *The purpose of this policy is to make clear that harassment will not be tolerated and to set forth the procedure for filing harassment complaints.*

### **POLICY**

Westmoor Military Institute strictly prohibits unlawful harassment and discrimination against employees or any other covered persons because of race, religion, creed, national origin, ancestry, sex (including pregnancy), gender (including sexual orientation, gender identity, and status as a transgender or transsexual individual), age, physical or mental disability, citizenship, genetic information, past, current, or prospective service in the uniformed services, or any other characteristic protected under applicable federal, state, or local law.

No one will be subject to, and Westmoor Military Institute prohibits, any form of discipline, reprisal, intimidation, or retaliation for good faith reporting of incidents of harassment of any kind, pursuing any harassment claim, or cooperating in related investigations.

Westmoor strongly believes in internal resolution of harassment complaints. The effectiveness of our efforts are measured by employee reporting and supervisor awareness. If employees feel, or supervisors are aware, that they or someone else may have been subjected to conduct that violates this policy, it must be reported. An individual who brings such a complaint to the attention of Westmoor, in good faith, will have their claim investigated promptly. If a harassment complaint is substantiated, immediate and appropriate remedial action will be taken, up to and including job termination.

### **Contact Information**

For questions or concerns, contact:

Human Resources Office

[hr@wmi.edu](mailto:hr@wmi.edu) | ext. 2034



**EXHIBIT 3**

## **Student Course Evaluations**

Instructor: Dr. Louise Shepard

Courses Taught: Introduction to Philosophy, European Literary Movements, American Political Thought

**Summary Report Generated:** December 13, 2022

### **Evaluation 1**

Dr. Shepard brings a lot of energy and experience to the classroom. Her military background gives her a unique perspective on ethical issues, which I appreciated. At times, though, her approach felt a bit intense, like a drill sergeant at boot camp, and I found it hard to ask questions during class because I worried they'd be shot down.

### **Evaluation 2**

I liked the class discussions, especially when we debated moral dilemmas! Dr. Shepard clearly knows her material and wants us to engage deeply. She's tough, but fair. I learned the most from her this semester.

### **Evaluation 3**

She expects a lot from students and doesn't tolerate nonsense, which some people didn't like. Personally, I appreciated how fair she was if you put in the effort, but some classmates felt she favored students who seemed to share her views on social issues. Sometimes it felt like there was too much emphasis on feminist topics or authors that made her too focused on discussing female authors that felt forced.

### **Evaluation 4**

The course was well organized, and I liked the readings she picked, especially some of the modern philosophers we hadn't covered in other classes. She's intense, maybe a little rigid. It's clear she's passionate, but it could be intimidating.

### **Evaluation 5**

It seemed like there was a lot of focus on bringing in female perspectives, which is valuable, but the balance felt off at times. Dr. Shepard is overly assertive and definitely not maternal like I hoped.





**EXHIBIT 4**

**Student Course Evaluations**

Instructor: Dr. Louise Shepard

Courses Taught: Introduction to Philosophy, European Literary Movements, American Political Thought

**Summary Report Generated:** May 23, 2023

**Evaluation 1**

Dr. Shepard knows her material, but the class atmosphere feels charged, like there's tension in the room and people seem hesitant to speak freely. During one class, I asked a question about one of the early female European authors and Dr. Shepard almost took my head off. I was just trying to clarify a portion of their text—not be disrespectful.

**Evaluation 2**

The discussions in class are heated, which isn't a bad thing, except that Dr. Shepard is less open to dissenting opinions. I stopped participating because I feel like anything I say will be judged.

**Evaluation 3**

I was excited about this course at first because of the great experience I had with Dr. Shepard in the fall. But now it feels like Dr. Shepard is on edge. She's clearly passionate but seems more impatient. A lot of us in class just check out.

**Evaluation 4**

The syllabus was challenging but interesting. Dr. Shepard pushed me to think more critically and expanded my ability to analyze and author responses to the texts presented in class.

**Evaluation 5**

Dr. Shepard is smart, but a real know-it-all. Just because I didn't read ahead for class a couple of times, she was all over my case.



**EXHIBIT 5**

## **Student Course Evaluations**

Instructor: Dr. Louise Shepard

Courses Taught: Introduction to Philosophy, European Literary Movements

**Summary Report Generated:** December 19, 2023

### **Evaluation 1**

The atmosphere in class is tense. Dr. Shepard is clear and organized, her points are easy to follow, but they get lost in the way she delivers them. She seems frustrated a lot, like something outside of class is going on, but she's taking it out on us.

### **Evaluation 2**

Dr. Shepard lectures frequently on gender dynamics, even when the topic doesn't call for it. But, Dr. Shepard is clearly qualified for this role, and her lectures are organized.

### **Evaluation 3**

I think Dr. Shepard has valid concerns, but it's exhausting when every lecture feels like a battle. The few times I've asked questions, I felt like I was being corrected not just on the content but on my worldview.

### **Evaluation 4**

It feels like Dr. Shepard is constantly looking for a fight. A professor should challenge students, sure, but not make them feel attacked. Dr. Shepard has gone beyond an earned reprimand and honestly, is just a bitch that I don't feel comfortable speaking in front of anymore.

### **Evaluation 5**

People warned me before I took this class. She's known for being tough, but now it's beyond tough. It's aggressive. I think she has good intentions, but she's alienating a lot of students.

# Ethical Reasoning in Military Conflict



Proposal by Dr. Louise Shepard  
December 15, 2022



**EXHIBIT 6**

## **Abstract**

This panel will explore ethical reasoning in military conflict, focusing on the real-world moral dilemmas that leaders face in combat and peacekeeping environments. Targeted at cadets, military faculty, and students in political science and philosophy, the session will provide frameworks for ethical decision-making and open a dialogue on how diverse voices shape ethical leadership in the armed forces.

### **I. Panel Presenters**

#### **Colonel Susan Harper (Ret.)**

Affiliation: Former U.S. Army Intelligence Officer

Colonel Harper led investigative teams on civilian casualty incidents in Afghanistan, advising senior commanders on ethics and rules of engagement. She is a frequent speaker on operational ethics and military accountability.

#### **Lt. Commander Taylor Kim, JAG Corps**

Affiliation: U.S. Navy, Judge Advocate General's Corps

Lt. Cmdr. Kim specializes in military justice and advises on legal frameworks governing combat operations. Her recent work includes advising on humanitarian law compliance in maritime security missions.

#### **Major General Anthony Caldwell (Ret.)**

Affiliation: Former Commander, U.N. Peacekeeping Forces

Major Gen. Caldwell brings decades of experience leading multinational operations and navigating complex moral terrain in peacekeeping efforts, including in the Balkans and Central Africa.

#### **Dr. Luis Ortega**

Affiliation: Professor of Military Ethics, Georgetown University

Dr. Ortega is an expert in Just War Theory and contemporary military ethics, with research focusing on asymmetric warfare, civilian harm, and the ethical use of emerging military technologies.

### **II. Panel Format**

- a. Opening Remarks – Dr. Louise Shepard (10 min)
- b. Panelist presentations – 4 speakers (10 min each)
- c. Moderated Discussion – Dr. Shepard guides (20 min)
- d. Audience Q&A – (20 min)

- e. Afternoon Workgroups (as needed)

### **III. Debate Topics & Potential Discussion Questions**

The Ethical Reasoning in Military Conflict panel seeks to equip future military leaders with tools for navigating moral complexity in the field. Through case studies, expert analysis, and firsthand accounts, the session will highlight the real tensions between mission objectives, legal frameworks, and human values. The discussion will explore topics such as proportionality, responsibility, and moral injury, underscoring how ethical leadership is both a personal and institutional responsibility. Special attention will be given to the importance of diverse perspectives — including those historically underrepresented in military leadership — in fostering more resilient, ethical organizations. Designed for cadets, faculty, and students, the panel aims to spark critical reflection and inspire attendees to carry forward ethical leadership in their future roles.

- a. When, if ever, is civilian harm morally justifiable?
- b. Can military obedience conflict with ethical responsibility?
- c. How do gender, culture, or national identity influence ethical military leadership?
- d. How should emerging technologies (e.g., drones, AI) reshape ethical standards in combat?

**Faculty Evaluation****Instructor:** Dr. Louise Shepard**Department:** Philosophy**Evaluator:** Mark Riley, Department Chair**Date:** December 17, 2022**Courses Taught:** Introduction to Philosophy, European Literary Movements, American Political Thought**Summary of Instructional Performance:**

Dr. Shepard joined Westmoor Military Institute in June 2022 and completed her first semester of teaching this fall. Student evaluations reflected a mix of positive and constructive feedback. Many students praised her command of course materials, engagement with philosophical debates, and ability to link moral theory to real-world military examples.

However, several student comments noted that her classroom style was perceived as “rigid” and “overly assertive,” with one comparing her to a “drill sergeant.” While it is not uncommon for a new instructor—particularly one with a military background—to approach a course with rigidity, this will be an area for growth moving forward.

**Strengths:**

- i. Strong subject matter expertise
- ii. Impressive and innovative integration of female philosophical voices into syllabus
- iii. Commitment to rigorous standard and classroom discipline expected by Westmoor

**Areas for Development:**

- i. Adapt classroom style to maintain discipline while fostering open dialogue
- ii. Consider approach in balance of readings and subsequent discussions to address perceived student concerns
- iii. Continue to build rapport with colleagues to foster collegial environment

**Course Assignments (Spring 2023)**

Dr. Shepard will continue teaching two lower-level courses and one upper-level course to further acclimatize to the student body and refine instructional style. Requests for additional advanced course assignments will be reconsidered after another successful semester.

I reviewed this evaluation with Dr. Louise Shepard and answered any and all questions that she had.

*/s/ Mark Riley*

I affirm that I have reviewed the foregoing evaluation and asked and all questions I had of Mark Riley.

*/s/ Louise Shepard*

**Faculty Evaluation****Instructor:** Dr. Louise Shepard**Department:** Philosophy**Evaluator:** Mark Riley, Department Chair**Date:** December 19, 2023**Courses Taught:** Introduction to Philosophy, European Literary Movements, American Political Thought**Summary of Instructional Performance:**

Dr. Shepard's instructional performance during the Fall 2023 semester reflected continued command of her subject matter and a structured, lecture-driven approach to classroom delivery. Students consistently rated her as knowledgeable and well-prepared, with several describing her lectures as "clear and organized" and her syllabus as "easy to follow." However, course evaluations also reflected concerns about engagement, with some cadets noting that "there wasn't much room to ask questions" and that Dr. Shepard was coming across frustrated and taking out frustrations on the students. While these critiques were not universal, they indicate a clear need for evaluation of classroom dynamics and pedagogical adaptation. Dr. Shepard maintained timely grading and fulfilled all administrative obligations.

**Strengths:**

- i. Deep intellectual commitment to curriculum
- ii. Willingness to engage on difficult topics, including ethical considerations in combat
- iii. Advocated for inclusion and diversity

**Areas for Development:**

- i. Improve classroom atmosphere and responsiveness to cadet concerns
- ii. Strengthen collegial relationships within the department and identify a mentor
- iii. Focus on shared governance rather than individual advocacy for overall department improvement

**Course Assignments (Fall 2023)**

Dr. Shepard will continue teaching the two lower-level courses and one upper-level course to further acclimatize to the student body and refine instructional style. Advanced course assignments remain under review and subject to whether a tenured faculty member will return to American Political Thought.

I reviewed this evaluation with Dr. Louise Shepard and answered any and all questions that she had.

*/s/ Mark Riley*

I affirm that I have reviewed the foregoing evaluation and asked and all questions I had of Mark Riley.

*/s/ Louise Shepard*

**From:** [Mark Riley](#)  
**To:** [Phil Dept ALL](#)  
**Subject:** Re: Spring 2024 Room Reassignments - Philosophy Department  
**Date:** Sunday, December 31, 2023 8:35:37 PM  
**Attachments:** [westmoormap.png](#)

---

All,

Following the campus-wide announcement from Facilities Management earlier this evening, I am writing to inform you of our department's specific room reassignments during the Spring 2024 term while Belmont Hall undergoes renovation

The following faculty members will be reassigned to offices in Calhoun Hall (rooms 210–215):

- Mark Riley – Room 212
- Jack Carr – Room 211
- Beau Hayes – Room 213
- Ellis Montgomery – Room 215
- Carrie Fischer – Room 214
- Elizabeth Beaumont – Room 210

Professor Keating and Professor Louise Shepard will be reassigned to offices 101 and 102, respectively in Hammond Hall. Please note that Hammond Hall will be shared with a few faculty from other departments and some administrative offices during this time.

Thank you for your flexibility and continued commitment to the department.

V/r,

Mark Riley  
Chair, Philosophy Department  
Westmoor Military Institute

**From:** [Office of Facilities Management](#)  
**To:** [All Faculty](#)  
**Subject:** Spring 2024 Belmont Hall Construction  
**Date:** Sunday, December 31, 2023 7:52:01 PM  
**Attachments:** [westmoormap.png](#)

---

Dear Faculty,

We are writing to inform you that Belmont Hall will undergo significant construction and renovation during the Spring 2024 term. This necessary work is part of our ongoing campus improvement plan to modernize classrooms, improve accessibility, and upgrade HVAC and technology systems.

As a result, all department chairs are instructed to coordinate with their respective college presidents to finalize temporary room reassignments for faculty currently housed in Belmont Hall. Please expect to receive your new room assignments by January 10, 2024. Faculty should be relocated to the available offices in Calhoun Hall, Hammond Hall, or other available office space on campus.

We understand this may cause some inconvenience, and we appreciate your flexibility and cooperation as we work to make Westmoor Military Institute a better place for students and faculty alike.

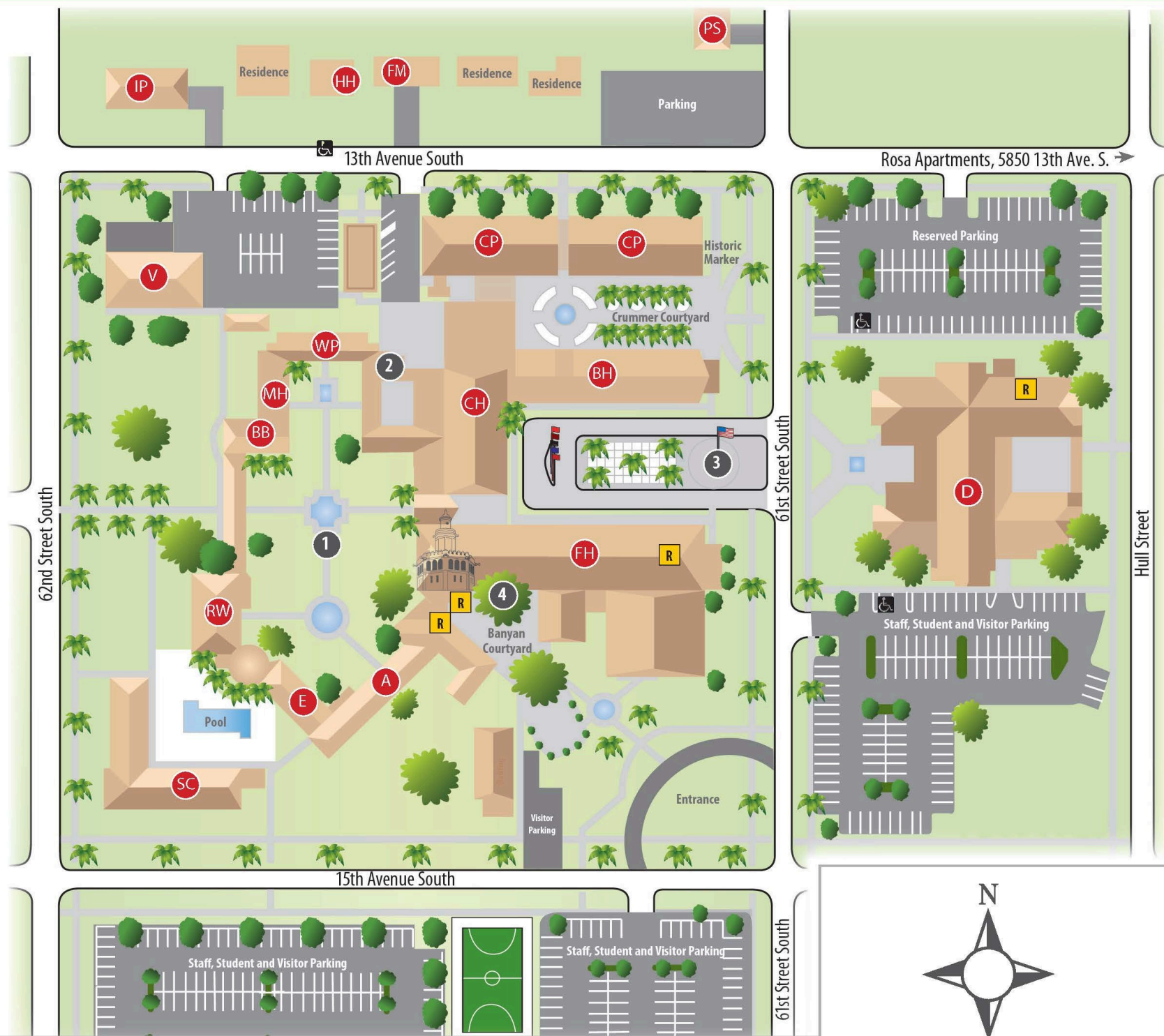
If you have specific concerns or need assistance regarding your relocation, please contact the Facilities Management Office at [facilities@westmoor.edu](mailto:facilities@westmoor.edu).

Thank you for your understanding and commitment.

Sincerely,  
Office of Facilities Management  
Westmoor Military Institute



# Westmoor Military Institute Campus Map



A	Administration	CP	Comdt. Pavilion	FM	Facilities Mgmt.	SC	Sports Complex
BB	Battle Brief	D	Barracks	HH	Hammond Hall	RW	RGR Walkway
BH	Belmont Hall	E	Prof. Engmt.	MH	Memorial Hall	<b>EXHIBIT 10</b> Case File 085	
CH	Calhoun Hall	FH	Founder's Hall	PS	Public Safety		



























**EXHIBIT 12**

From: Rollins Tucker <rollins.tucker@westmoor.edu>

To: Louise Shepard <louise.shepard@westmoor.edu>

Date: January 17, 2024, 9:12 AM

Subject: Re: Meeting Request - Retaliation Discrimination Concern

Dear Professor Shepard,

Thank you for providing your availability. I have scheduled our meeting for January 23, 2024. Please plan to meet in my office in the human resources offices at 14:00.

If you have any materials or documentation you wish to provide in advance, feel free to email them or bring them with you.

Best,  
Rollins Tucker  
Assistant Director of Human Resources

-----  
From: Louise Shepard <louise.shepard@westmoor.edu>

To: Rollins Tucker <rollins.tucker@westmoor.edu>

Date: January 10, 2024, 8:34 AM

Subject: Re: Meeting Request - Retaliation Discrimination Concern

Dear Rollins,

Thank you for your response. I am available all day on January 23rd or January 25th and can adjust to any time you have open on those dates.

Best,  
Louise

-----  
From: Rollins Tucker <rollins.tucker@westmoor.edu>

To: Louise Shepard <louise.shepard@westmoor.edu>

Date: January 10, 2024, 8:02 AM

Subject: Meeting Request - Retaliation Discrimination Concern

Dear Professor Shepard,

Thank you for reaching out to Human Resources. I would like to schedule a meeting to discuss your concerns. Please provide your availability so we can coordinate a time.

Best,  
Rollins Tucker  
Assistant Director of Human Resources

-----

From: Louise Shepard <louise.shepard@westmoor.edu>

To: HR General Inbox <hr@westmoor.edu>

Date: January 3, 2024, 11:58 AM

Subject: Meeting Request - Retaliation Discrimination Concern

To whom it may concern,

I am writing to formally request a meeting to discuss how I have been retaliated against for a statement I made at a faculty meeting on January 9, 2023. I do not feel comfortable raising these concerns directly with my department chair, Mark Riley because he has committed unlawful acts of retaliation against me. I would appreciate the opportunity to speak confidentially with someone in Human Resources.

Please let me know the next steps.

Sincerely,  
Louise Shepard  
Associate Professor, Philosophy Department

**From:** [Lauren Townsend](#)  
**To:** [Louise Shepard](#)  
**Subject:** Outcome of HR Investigation and Offer for Mediation  
**Date:** Monday, February 19, 2024 10:07:18 AM  
**Attachments:** [shepardfinalreport.pdf](#)

---

Dear Louise,

I am writing to inform you that the investigation regarding your concerns of a retaliatory hostile work environment has been completed. After a thorough review of the information gathered, including all relevant interviews, your faculty and student evaluations, we are not making a finding that you were the subject of any retaliatory action.

We recognize that workplace dynamics can still be challenging, and in the interest of fostering a productive and collegial environment, we would like to offer you the opportunity to participate in a mediation session with Mark. This mediation would be facilitated by a neutral mediator, with the goal of addressing any ongoing concerns and improving communication moving forward.

Thank you for your engagement throughout this process.

Sincerely,

Lauren Townsend  
Human Resources Director



**EXHIBIT 13-A**

## Human Resources Investigation Report

Prepared by: Rollins Tucker, Assistant Director of Human Resources

Reviewed and Approved by: Lauren Townsend, Director of Human Resources

Date: February 9, 2024

### **I. INTRODUCTION**

This report summarizes the Human Resources investigation into allegations of retaliation made by Professor Louise Shepard, a faculty member in the Department of Philosophy. Professor Shepard submitted a formal complaint to the HR Office on January 3, 2024, alleging that she was subjected to a hostile work environment in retaliation for opposing an unlawful discrimination practice.

### **II. SCOPE OF INVESTIGATION**

During the course of this investigation, the HR Office:

- Obtained and analyzed all relevant documentation including:
  - Review of internal email communications and office assignment logs
  - Review of 2023 and 2024 philosophy department course schedule assignments
  - Review of 2022 and 2023 annual evaluation for Louise Shepard
  - Review of 2022 and 2023 student evaluations from Professor Shepard's courses
- Conducted interviews with relevant witnesses including:
  - Assistant Professor Louise Shepard (January 23)
  - Department Chair Mark Riley (February 3)
  - Professor Ellis Montgomery (February 6)

### **III. SUMMARY OF WITNESS INTERVIEWS**

#### **1. Interview with Louise Shepard:**

Professor Shepard stated that at the January 2023 faculty meeting, she stated an official opposition to what she believed to be, reports and observations of gender discrimination at Westmoor. Following that reporting, her relationship with Chair Riley and other colleagues rapidly deteriorated. She reported being reassigned to teach only introductory courses, relocated to a less desirable office, and excluded from social events. One of the primary characters who contributed to these feelings of isolation and exclusion was Professor Hayes.

Note: Professor Hayes was ultimately assigned to teach a course Professor Shepard had requested and felt entitled to based on seniority.

2. Interview with Mark Riley:

Chair Riley acknowledged that Professor Shepard had expressed concerns about gender equity during a faculty meeting but denied taking any retaliatory action. He stated that the reassignment of courses was due to scheduling needs, student demand, student and faculty feedback, and the availability of the department professors. Chair Riley further stated that the office changes were assigned randomly as a result of construction to Belmont Hall. He expressed surprise that Professor Shepard perceived these events as punitive.

3. Interview with Ellis Montgomery:

Professor Montgomery reported that Montgomery had not witnessed overt hostility toward Professor Shepard but noted that interpersonal dynamics in the department had become strained. Professor Montgomery described Chair Riley's communication style as "strictly business" and while not intentional, understood why Professor Shepard felt marginalized and punished.

#### **IV. SUMMARY OF FINDINGS**

1. Professor Shepard's allegations center on changes to her teaching assignments and physical office relocation. Records confirm that she was reassigned from an upper-level course and moved to a different office, but similar adjustments were made for other faculty during the same period.
2. No witness provided direct evidence of retaliatory intent. The alleged conduct primarily concerns tone and perceived exclusion, which are not easily corroborated.
3. The investigation revealed no violations of formal HR policy.

#### **V. CONCLUSION**

Based on the information gathered, there is insufficient evidence to conclude that Professor Shepard was subjected to retaliation in violation of Westmoor's policies. The course reassignment and office change have administrative justifications. While Professor Shepard's perception of exclusion is acknowledged, the decision-making processes appear facially neutral. However, in the spirit of resolving Professor Shepard's concerns, human resources will offer to facilitate a neutral mediation with Professor Shepard and Chair Riley.

**EXHIBIT 14**

