

MOORED ASSOCIATES, LLC

ANNUAL SECURITY REPORT

October 2024

TWIN CITY BEAUTY COLLEGE

MICHIANA BEAUTY COLLEGE

TRAVERSE CITY BEAUTY COLLEGE

TULIP CITY BEAUTY COLLEGE

NUVO COLLEGE OF COSMETOLOGY

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Campus Security

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act), in addition to the Campus Security Act, requires all colleges and universities that participate in federal financial aid programs to keep and disclose information about crime on and near their respective campuses. The Violence Against Women Reauthorization Act (VAWA) amended the Clery Act to require institutions to compile statistics for the number of incidents of dating violence, domestic violence, sexual assault, and stalking as well as to include certain policies, procedures and programs pertaining to these incidents in this report.

Campuses are not permitted to take retaliatory action against anyone with respect to the implementation of any provision of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act or Violence Against Women Act.

Moored Associates LLC. has no dorms on campus and does not recognize any off campus student organizations that would be covered under this act.

Anyone may obtain a paper copy of the Annual Security Report through the Campus Director. There is no fee charged for this report. This report is kept in the Campus Director's office. Moored Associates LLC. will update this report annually and will post on each campus' bulletin board to notify that the updated report is available and how to obtain a copy. The report is also available online at www.tcbeautycollege.com.

Moored Associates LLC. urges everyone to be aware of their environment and to strive to maintain the highest level of safety within our community.

Security Contacts

Campus Security Authority - Campus Director

Twin City Beauty College – Buffy Leonard
Phone Number: 616-600-8487 ext. 1301
Email: bleonard@mooredbeautyschools.com

Tulip City Beauty College – Heidi Tarman
Phone Number: 616-828-0065 ext. 1010
Email: htarman@mooredbeautyschools.com

Traverse City Beauty College - Julie Merriner
Phone Number: 616-328-5232 ext. 1201
Email: jmerriner@mooredbeautyschools.com

Michiana Beauty College - Buffy Leonard
Phone Number: 616-327-7714 ext. 1101
Email: bleonard@mooredbeautyschools.com

Nuvo College of Cosmetology – Brittany Fashingbauer
Phone Number: 616-327-6532 ext. 1402
Email: bfashingbauer@mooredbeautyschools.com

Emergency Response & Evacuation Plan

Moored Associates LLC. requires its campuses to maintain an Emergency Response and Evacuation Plan (EREP) which includes plans and instructions to be followed by campus administration, faculty, staff, students, and guests in the event of emergencies and evacuations. Each campus has a Campus Security Authority (CSA), who is responsible for reporting and ensuring the evacuation of the campus in the case of an emergency. The CSA is the Campus Director at each campus. The EREP includes:

- 1) A provision for immediate notification of the campus community upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health and safety of students or staff occurring on the campus.
- 2) Procedures for testing and publishing the plan on an annual basis.
- 3) Procedures for disseminating updated emergency information, which explain how this information will be communicated to the campus and relevant members of the community on a regular basis.

Security & Access To Facilities

- Each campus limits access to all campus facilities to authorized personnel, students, and visitors. Unauthorized persons will be considered “trespassers” and will be dealt with accordingly.
- Adequate lighting is provided at all campus locations, especially in outside areas. Certain school staff and faculty are always on campus during business hours.
- Only authorized vehicles are allowed to park in the designated parking areas.
- The Campus Security Authority at each campus represents the campus and is instructed to enforce campus security policies.
- Security personnel is defined as any individual who is responsible for monitoring entrance into campus property, and any individual specified in a campus security policy as an individual to whom students and employees should report criminal offenses. This individual may have significant responsibility for student and campus activities but is limited to enforcement of campus rules and regulations. Incidents that go beyond the scope of campus personnel are referred to and investigated by the local law enforcement agencies.
- Security personnel have the authority to evict unauthorized persons from the campus premises and will notify local authorities of all actual or suspected criminal activities, including trespassing.
- The campuses maintain relationships with local police through campus in-services and collection of statistical in-services. In addition, the campuses work with local law enforcements as necessary to report or investigate crimes.

Crime Awareness & Prevention

- All new campus employees and students are instructed on crime awareness during the orientation process at Moored Associates LLC. This includes the description of campus security measures and procedures for reporting any criminal activity or emergency. Students are required to follow campus security guidelines to protect their own personal property and are encouraged to report any suspicious activity.
- Prospective students and employees are provided with a summary of the campus measures to prevent crime on campus, with details for acquiring the complete policies and procedures package for the campus via the catalog, online or at the campus location. This information on crime awareness is readily available upon request and will be updated and re-distributed to all existing students and staff on an annual basis.
- The campus does not maintain any off-campus student organizations.

Information About Registered Sex Offenders

The Campus Sex Crimes Prevention Act requires colleges and universities to disclose to its students the location of sex offender registries and the campus community where state law enforcement agency information concerning registered sex offenders may be obtained. The act also requires registered sex offenders to provide a notice of any campus of higher education in which the offender is employed, carries on a vocation, or is a student to state officials.

Students who are subject to an involuntary civil commitment, after completing a period of incarceration for a forcible or non-forcible sexual offense, are ineligible to receive a Federal Pell Grant.

Any member of the campus community who wishes to obtain further information regarding sexual offenders in the area may refer to <http://www.sexoffender.com> for the national registry.

Information can also be obtained on registered sex offenders of the campus community at www.familywatchdog.us.

Crime Prevention and Risk Reduction

Often people contribute to crimes of opportunity by needlessly placing themselves or their property at risk. Prevention efforts can be effective in reducing the opportunities for criminal activity. The following list is a compilation of tips devoted to crime prevention and risk reduction:

- Do not leave books or personal property unattended in the school
- Report suspicious individuals to security
- At night, always walk in groups of at least two
- Stay on the main walkway, avoid secluded streets and pathways or alleys
- Keep your vehicle in good condition and park in lighted areas
- Always lock your vehicle and secure your valuables
- Have your keys in your hand before you reach your vehicle
- Check the interior of your vehicle before entering it
- If you believe you are being followed , DO NOT DRIVE HOME. Stay on busy streets and drive to the police department
- Keep lockers locked at all times
- Always carry your picture ID
- Do not carry large amounts of cash
- Be aware of your surroundings and what is going on around you
- Let someone know where you are and when you will be finished
- Avoid dangerous situations
- Always keep your keys in your possession as keys can be duplicated
- Report all thefts immediately
- If you observe an individual in an improper restroom, leave immediately and call police and/or let the campus security authority know as soon as possible.

Crime Log

The campus maintains a Crime Log that records, by the date the alleged crime was reported, any crime that occurred on campus, on a non-campus building or property, on public property, or within the patrol jurisdiction of the Campus Security Authority.

The log includes:

- Date of entry
- Incident report date
- Date/time of the crime
- Nature/type of the crime/complaint
- General location of crime

The campus must make an entry or an addition to an entry on the log within two business days of the report of the information to the campus security authority, unless that disclosure is prohibited by law or would jeopardize the confidentiality of the complainant. The campus security authority is required to send the crime log to the Moored Associates LLC. corporate office for each incident within one business day of reporting the crime. The corporate office will review the logs and keep a master log for all Moored Associates LLC. locations.

Reporting Crimes

1. During school hours students who wish to report alleged criminal acts should immediately contact their Campus Director or a member of the Campus Management staff and complete the Incident Report Form and submit to the campus director.
2. Reporting crimes is on a voluntary, confidential basis. Complainants will be assisted upon request.
3. The Campus Director is responsible to document any criminal acts, as well as reporting crimes to the local authorities as required by law.
4. The campus is required to make timely warnings to members of the campus community regarding the occurrence of crimes. The campus community includes the campus building and grounds and all adjacent public property.
5. If there is an ongoing investigation of a crime that occurred in, at, or on any Moored Associates LLC. locations that would be jeopardized, cause the suspect to flee, risk the safety of an individual, or result in the destruction of evidence, the campus may delay the timely warning until any adverse effect is no longer likely to occur.
6. The statistics are collected centrally for each campus on a monthly basis and reported to the Department of Education annually.
7. If a crime occurs during non-school hours and no faculty or staff member is available, notify the police department immediately and Moored Beauty Schools' Director as soon as possible during normal business hours.

Remember: Preserving evidence for proof of a criminal offense is very important.

Discrimination

Moored Associates LLC. prohibits discrimination and harassment on the basis of race, color, creed, religion, sex, gender, national origin, citizenship, ethnicity, marital status, age, disability, sexual orientation, gender identity and gender expression, genetic information, veteran status, or any other status protected by applicable law to the extent prohibited by law.

Sexual Misconduct Policies & Procedures

Members of the Moored Associates LLC. community and visitors have the right to be free from all forms of gender and sex-based discrimination, examples of which include acts of sexual assault, sexual harassment, domestic violence, dating violence, sexual exploitation, and stalking. All members of the campus community are expected to conduct themselves in a manner that does not infringe upon the rights of others.

Scope of the Policy

This Policy governs sexual misconduct involving students that occurs on any school property or in connection with any school-sponsored program or event. This Policy applies to all students, employees, and third parties conducting business with Moored Associates LLC., regardless of the person's gender, gender identity, sexual orientation, age, race, nationality, class status, ability, religion, or other protected status. Moored Associates LLC. encourages complainants of sexual violence to talk to somebody about what happened – so complainants can get the support they need, and so the school can respond appropriately. As further described in this Policy, Moored Associates LLC. will seek to respect a complainant's request for confidentiality to the extent possible, while remaining ever mindful of the complainant's well-being.

Sexual misconduct will be evaluated by considering the totality of the circumstances, including the nature, frequency, intensity, location, context, and duration of the questioned behavior. Repeated incidents or a pattern of harassing behavior may be cause for serious corrective action. However, a more serious incident, even if isolated, may be sufficient cause for action under this policy including referral to law enforcement when applicable.

Quid pro quo sexual misconduct can occur whether a person resists and suffers the threatened harm, or the person submits and avoids the threatened harm. Both situations could constitute discrimination on the basis of sex. A hostile environment can be created by persistent or pervasive conduct or by a single severe episode. The more severe the conduct, the less need there is to show a repetitive series of incidents to prove a hostile environment. Sexual violence, including rape, sexual assault, and domestic violence, is a form of sexual harassment. In addition, the following conduct may violate this policy:

1. Observing, photographing, videotaping, or making other visual or auditory records of sexual activity or nudity, where there is a reasonable expectation of privacy, without the knowledge and consent of all parties.
2. Sharing visual or auditory records of sexual activity or nudity without the knowledge and consent of all recorded parties and recipients.
3. Sexual advances, whether or not they involve physical touching.
4. Commenting about or inappropriately touching an individual's body.
5. Requests for sexual favors in exchange for actual or promised job benefits, such as favorable reviews, salary increases, promotions, increased benefits, or continued employment.
6. Lewd or sexually suggestive comments, jokes, innuendoes, or gestures.
7. Stalking

Other verbal, nonverbal, graphic, or physical conduct may create a hostile environment if the conduct is sufficiently persistent, pervasive, or severe so as to deny a person equal access to the school's programs or

activities. Whether the conduct creates a hostile environment may depend on a variety of factors, including: the degree to which the conduct affected one or more person's education or employment; the type, frequency, and duration of the conduct; the relationship between the parties; the number of people involved; and the context in which the conduct occurred.

Prohibited Conduct

Sexual misconduct comprises a broad range of behaviors focused on sex that may or may not be sexual in nature. Any intercourse or other intentional sexual touching or activity without the other person's consent is sexual assault, which is a form of sexual misconduct under this Policy. Sexual harassment and sexual exploitation, stalking, domestic violence, and dating violence are also forms of sexual misconduct. Intimidation for one of these purposes is sexual misconduct, as is retaliation following an incident of alleged sexual misconduct or attempted sexual misconduct. The definitions for specific acts of sexual misconduct can be found at the end of this Policy statement.

Misconduct can occur between strangers or acquaintances, or people who know each other well, including between people involved in an intimate or sexual relationship, can be committed by anyone regardless of gender identity, and can occur between people of the same or different sex or gender. **This Policy prohibits all forms of sexual misconduct.**

Title IX Coordinator

The Campus Title IX Coordinator is responsible for monitoring and overseeing each school's compliance with Title IX and the prevention of sexual harassment, sexual misconduct, and discrimination. The Campus Title IX Coordinator is:

- Knowledgeable and trained in Moored Beauty College's policies and procedures and relevant state and federal laws;
- Available to advise any individual, including a complainant, respondent, or a third party, about campus and community resources and reporting options;
- Available to provide assistance to any school employee regarding how to respond appropriately to a report of Title IX-related prohibited conduct and related retaliation;
- Participates in ensuring the effective implementation of this Policy, including monitoring compliance with all procedural requirements, record keeping, and timeframes; and
- Responsible for overseeing training, prevention, and education efforts and annual reviews of climate and culture.

Inquiries or concerns about Title IX may be referred to the Title IX Coordinator. The Title IX Coordinator contact information is set forth below and is also published on the school's website.

Erica Tijerina

Phone Number: 616-600-9848 ext.1006

Email: etijerina@mooredbeautyschools.com

Education and Prevention Programs

Moored Associates LLC. will provide appropriate programming to promote the awareness of sexual misconduct for all employees and students on an ongoing basis. This program will include information regarding safe and positive options for bystander intervention and information on risk reduction.

Moored Associates LLC. is committed to offering educational programs to promote awareness and prevention of Prohibited Conduct. Educational programs include an overview of the schools' policies and procedures; relevant definitions, including prohibited conduct; discussion of the impact of alcohol and illegal drug use; consent; safe and positive options for bystander intervention; review of resources and reporting options available for students, faculty, and staff; and information about risk reduction. Incoming students and new employees will receive primary prevention and awareness programming as part of their orientation. The Title IX Coordinator maintains an education and prevention calendar and tailors programming to campus needs and climate.

As part of Moored Associates LLC. commitment to provide an educational and work environment free from Prohibited Conduct, this Policy will be disseminated widely to the school community through e-mail communication, publications, websites, new employee orientations, student orientations, and other appropriate channels of communication.

The Title IX Coordinator, hearing panel members, and anyone else who is involved in responding to, investigating, or adjudicating sexual misconduct will receive annual training from experts in the field. In addition to training on how the adjudicatory process works, the training will include specific instruction about how to approach students about sensitive issues that may arise in the context of sexual misconduct.

Bystander Intervention

Moored Associates LLC. primary prevention and awareness program includes a description of safe and positive options for bystander intervention. Active bystanders take the initiative to help someone who may be targeted for a sexual assault. They do this in ways that are intended to avoid verbal or physical conflict. Active bystanders also take the initiative to help friends, who are not thinking clearly, from becoming offenders of crime. Intervention does not mean that you directly intervene to stop a crime in progress; rather, these steps are "early intervention" – before a crime begins to occur. There are three important components to consider before taking action that we refer to as the ABCs:

- **Assess for safety.** Ensure that all parties are safe, and whether the situation requires calling authorities. When deciding to intervene, your personal safety should be the #1 priority. When in doubt, call for help.
- **Be with others.** If it is safe to intervene, you are likely to have a greater influence on the parties involved when you work together with someone or several people. Your safety is increased when you stay with a group of friends that you know well.
- **Care for the person.** Ask if the target of the unwanted sexual advance/attention/behavior is okay – does he or she need medical care? Ask if someone they trust can help them get safely home.

Information on Bystander Intervention was provided by the Department of Defense Sexual Assault Prevention and Response Office from: www.sapr.mil

Risk Reduction

Moored Associates LLC. primary prevention and awareness program includes information on risk reduction.

This includes:

Avoiding Dangerous Situations. While you can never completely protect yourself from sexual assault, there are some things you can do to help reduce your risk of being assaulted:

- Be aware of your surroundings. Knowing where you are and who is around you may help you to find a way to get out of a bad situation.
- Try to avoid isolated areas. It is more difficult to get help if no one is around.
- Walk with purpose. Even if you don't know where you are going, act like you do.
- Trust your instincts. If a situation or location feels unsafe, it probably isn't the best place to be.
- Try not to load yourself down with packages or bags as this can make you appear more vulnerable.
- Make sure your cell phone is with you and charged and that you have cab money.
- Don't allow yourself to be isolated with someone you don't trust or someone you don't know.
- Avoid putting music headphones in both ears so that you can be more aware of your surroundings, especially if you are walking alone.

Safety Planning. Things to think about:

- How to get away if there is an emergency? Be conscious of exits or other escape routes. Think about options for transportation (car, bus, subway, etc.).
- Who can help? Friends and/or family, or support centers in your area.
- Where to go? Options may include a friend's house or relative's house, or you may consider going to a domestic violence or homeless shelter. You may also go to the police. **Important Safety Note:** If the dangerous situation involves a partner, go to the police or a shelter first.
- What to bring? This may include important papers and documents such birth certificate, social security card, license, passport, medical records, lease, bills, etc. This will also include house keys, car keys, cash, credit cards, medicine, important numbers, and your cell phone. If you are bringing children with you, remember to bring their important papers and legal documents. You can keep all of these things in an emergency bag. You should hide the bag—it is best if it is not in your house or car. If the bag is discovered, you can call it a "tornado" or "fire" bag.

Protecting Your Friends. You have a crucial role to play in keeping your friends safe. No matter what the setting, if you see something that doesn't feel quite right or see someone who might be in trouble, there are some simple things you can do to help out a friend:

- Distract. If you see a friend in a situation that doesn't feel quite right, create a distraction to get your friend to safety. This can be as simple as joining or redirecting the conversation: suggest to your friend that you leave the party, or ask them to walk you home. Try asking questions like: "Do you want to head to the bathroom with me?" or "Do you want to head to another party – or grab pizza?"
- Step in. If you see someone who looks uncomfortable or is at risk, step in. If you feel safe, find a way to de-escalate the situation and separate all parties involved. Don't be shy about directly asking the person if they need help or if they feel uncomfortable.
- Enlist others. You don't have to go it alone. Call in friends or other people in the area as reinforcements to help defuse a dangerous situation and get the at-risk person home safely. There is safety in numbers.
- Keep an eye out. Use your eyes and ears to observe your surroundings. If you see someone who has had too much to drink or could be vulnerable, try to get them to a safe place. Enlist friends to help you. Even if you weren't around when the assault occurred, you can still support a friend in the aftermath.

Social Situations. While you can never completely protect yourself from sexual assault, there are some things you can do to help reduce your risk of being assaulted in social situations:

- When you go to a social gathering, go with a group of friends. Arrive together, check in with each other throughout the evening, and leave together. Knowing where you are and who is around you may help you to find a way out of a bad situation.
- Trust your instincts. If you feel unsafe in any situation, go with your gut. If you see something suspicious, contact law enforcement immediately.
- Don't leave your drink unattended while talking, dancing, using the restroom, or making a phone call. If you've left your drink alone, just get a new one.
- Don't accept drinks from people you don't know or trust. If you choose to accept a drink, go with the person to the bar to order it, watch it being poured, and carry it yourself. At parties, don't drink from the punch bowls or other large, common open containers.
- Watch out for your friends, and vice versa. If a friend seems out of it, is way too intoxicated for the amount of alcohol they've had, or is acting out of character, get him or her to a safe place immediately.
- If you suspect you or a friend has been drugged, contact law enforcement immediately. Be explicit with doctors so they can give you the correct tests (you will need a urine test and possibly others).

Information on Risk Reduction was provided by RAINN: Rape, Abuse & Incest National Network: www.rainn.org.

Reporting Policies and Protocols

Moored Associates LLC. strongly encourages all members of the school community to report information about any incident of sexual misconduct as soon as possible, whether the incident occurred on or off campus. Reports can be made either to the school and/or to law enforcement.

Reporting to the Institute / Grievance Policy

An incident of sexual misconduct may be reported directly to the campus Title IX Coordinator. If the campus Title IX Coordinator is the alleged respondent of the sexual misconduct, the report should be submitted to the Owner of Moored Associates LLC.. Filing a report with a school official will not obligate the complainant to prosecute, nor will it subject the complainant to scrutiny or judgmental opinions from officers.

An individual who has experienced an incident of sexual misconduct may report the incident at any time, regardless of how much time has elapsed since the incident occurred. Moored Beauty Schools are committed to supporting the rights of a person reporting an incident of sexual misconduct to make an informed choice among options and services available.

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

Whenever a student or parent/guardian or staff member believes the he or she has been adversely affected by a school employee or student including but not limited to sexual misconduct and sexual decimation they may file a complaint on the Complaint/Grievance form supplied on our website or app at <https://www.tcbeautycollege.com>. The Complaint/Grievance form should be filed as soon as possible. The grievance must include the following information in writing: (1) Description of complaint; (2) who was involved; (3) who you already spoke with about the complaint (4) the specific resolution desired.

Reporting to Law Enforcement

An incident of sexual misconduct can be reported to law enforcement at any time, 24 hours a day/7 days a week, by calling 911. At the complainant's request, Moored Associates LLC. will assist the complainant in contacting law enforcement. If the complainant decides to pursue the criminal process, the school will cooperate with law enforcement agencies to the extent permitted by law. A complainant has the option to decide whether or not to participate in any investigation conducted by law enforcement. Filing a police report will:

- Ensure that a complainant of sexual assault receives the necessary medical treatment and tests
- Provide the opportunity for collection of evidence helpful in prosecution, which cannot be obtained later (ideally a complainant of sexual assault should not wash, douche, use the toilet, or change clothing prior to a medical/legal exam)
- Assure the complainant has a referral to confidential counseling from counselors specifically trained in the area of sexual assault

The complainant of the sexual assault may choose for the investigation to be pursued through the criminal justice system and Moored Associates LLC. disciplinary procedures. The school and the criminal justice system work independently from each other. Law enforcement officers do not determine whether a violation of this Policy has occurred. The campus Title IX Coordinator will guide the complainant through the available options and support the complainant in his or her decision.

Evidence Preservation

Complainants of sexual assault, domestic violence or dating violence should consider seeking medical attention as soon as possible. It is important that a complainant of sexual assault not bathe, douche, smoke, change clothing or clean the bed/linen where they were assaulted so that evidence necessary to prove criminal activity may be preserved. In circumstances where the complainants do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address health concerns. Complainants of sexual misconduct are encouraged to also preserve evidence by saving text messages, instant messages, social networking pages, other communications, and keeping pictures, logs or other copies of documents, if they have any, that would be useful in connection with a school or police investigation.

Reporting of Crimes & Annual Security Reports

Campus safety and security are important issues at the Moored Associates LLC.. Our goal is to provide students with a safe environment in which to learn and to keep students, parents, and employees well informed about campus security. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, or Clery Act, requires institutions of higher education to record and report certain information about campus safety, including the number of incidents of certain crimes on or near campus, some of which constitute sexual misconduct under this Policy.

Each year Moored Associates LLC. prepares this report to comply with the Clery Act. The full text of this report can be located on the school's web site at www.tcbeautycollege.com. This report is prepared in cooperation with the local law enforcement agencies around our campuses. Each year notification is made to all enrolled students and employees that provides the web site to access this report. Copies of the report may also be

obtained in person from or by calling the Campus Director. All prospective employees may obtain a copy from the Campus Director.

Third-Party and Anonymous Reporting

In cases where sexual misconduct is reported to the Title IX Coordinator by someone other than the complainant (by an instructor, classmate or friend, for example), the Title IX Coordinator will promptly notify the complainant that a report has been received. These Policy and the Procedures will apply in the same manner as if the complainant had made the initial report. The Title IX Coordinator will make every effort to meet with the complainant to discuss available options and resources. Reports from an anonymous source will be treated in a similar fashion.

No Retaliation

Moored Associates LLC. prohibits retaliation against those who file a complaint or third-party report, or otherwise participate in the investigative and/or disciplinary process (e.g., as a witness). The school will take strong responsive action if retaliation occurs. Any incident of retaliation should be promptly reported to the campus Title IX Coordinator or the President of Moored Beauty Schools.

Coordination With Drug Free School Policy

Students may be reluctant to report instances of sexual misconduct because they fear being disciplined pursuant to the Moored Associates LLC. alcohol or drug policies. The school encourages students to report all instances of sexual misconduct and will take into consideration the importance of reporting sexual misconduct in addressing violations of the school's alcohol and drug policies. This means that, whenever possible, Moored Associates LLC. will respond educationally rather than punitively to student alcohol or drug policy violations associated with reported sexual misconduct.

Key Definitions

For purposes of this policy and these procedures, the term "complainant" means the person making the allegation(s) of sexual misconduct, and the term "respondent" means the person alleged to have committed sexual misconduct.

Options for Assistance Following an Incident of Sexual Misconduct

Moored Associates LLC. strongly encourages any complainant of sexual misconduct to seek immediate assistance. Seeking prompt assistance may be important to ensure a complainant's physical safety or to obtain medical care. Moored Associates LLC. strongly advocates that a complainant of sexual assault reports the incident in a timely manner. Time is a critical factor for evidence collection and preservation.

Support Services Available

Counseling, advocacy, and support services are available for complainants of sexual misconduct, whether or not a complainant chooses to make an official report or participate in the school's disciplinary or criminal process. Moored Associates LLC. does not provide counseling or health care services. Personal counseling offered by Moored Associates LLC. will be limited to initial crisis assessment and referral.

Sexual misconduct crisis and counseling options are available locally and nationally through several agencies. Information about the appropriate agencies for each campus is published at the end of this report.

School Policy on Confidentiality

Moored Associates LLC. encourages complainants of sexual misconduct to talk to somebody about what happened – so complainants can get the support they need, and so the school can respond appropriately.

This policy is intended to make students aware of the various reporting and confidential disclosure options available to them – so they can make informed choices about where to turn should they become a complainant of sexual misconduct. Moored Associates LLC. encourages complainants to talk to someone identified in one or more of these groups.

Privileged and Confidential Communications – Professional & Pastoral Counselors

Professional, licensed counselors and pastoral counselors who provide mental-health counseling to members of the community (and including those who act in that role under the supervision of a licensed counselor) are not required to report any information about an incident to the Title IX coordinator without a complainant's permission. Moored Associates LLC. does not provide professional or pastoral counseling but can assist a complainant of sexual misconduct in obtaining support services from these groups or agencies. Contact information for the support organizations in each campus community is published at the end of this report.

A complainant who at first requests confidentiality may later decide to file a complaint with Moored Associates LLC. or report the incident to local law enforcement, and thus have the incident fully investigated.

NOTE: While these professional and pastoral counselors and advocates may maintain a complainant's confidentiality in relation to Moored Associates LLC., they may have reporting or other obligations under state law.

ALSO NOTE: If Moored Associates LLC. determines that the alleged respondent(s) pose a serious and immediate threat to the school community, the Campus Director may be called upon to issue a timely warning to the community. Any such warning should not include any information that identifies the complainant.

Reporting to Title IX Coordinator

When a complainant reports to the Title IX Coordinator about an incident of sexual misconduct, the complainant has the right to expect Moored Associates LLC. to take immediate and appropriate steps to investigate what happened and to resolve the matter promptly and equitably. A Title IX Coordinator with actual knowledge of sexual misconduct will respond promptly in a manner that is not deliberately indifferent. Complainants and respondents will both be treated equitably. The Title IX Coordinator will be deliberately indifferent only if its response to sexual misconduct is clearly unreasonable in light of the known circumstances.

The Title IX Coordinator will promptly contact the complainant to discuss the availability of supportive measures, consider the complainant's wishes with respect to supportive measures, inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the complainant the process for filing a formal complaint.

In response to a formal complaint Moored Associates LLC. will treat complainants and respondents equitably; require an objective evaluation of all relevant evidence; require that an individual designated by a recipient as

a Title IX Coordinator, investigator, decision maker, or any person designated to facilitate an informal resolution process, not have a conflict of interest or bias. All will have received proper training. The respondent is not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the grievance process made in a reasonable prompt time frame. Then the possible disciplinary sanctions and remedies will be described and may be implemented following any determination of responsibility. We will state the standard of evidence used to determine responsibility. Complainant and respondents will have the opportunity to appeal where they can describe the range of supportive measures. Moored Associates LLC. will not require, allow, rely upon, or otherwise use questions or evidence that constitute, or seek disclosure of, information protected under a legally recognized privilege, unless the person holding such privilege has waived privilege.

To the extent possible, information reported to the Title IX Coordinator will be shared only with people responsible for handling the school's response to the report. The Title IX Coordinator should not share information with law enforcement without the complainant's consent or unless the complainant has also reported the incident to law enforcement.

Before a complainant reveals any information to the Title IX Coordinator, the Coordinator should ensure that the complainant understands the Coordinator's reporting obligations – and, if the complainant wants to maintain confidentiality, direct the complainant to confidential resources. If the complainant wants to tell the Title IX Coordinator what happened but also maintain confidentiality, the Title IX Coordinator should tell the complainant that Moored Associates LLC. will consider the request but cannot guarantee that the school will be able to honor it.

The Title IX Coordinator will not pressure a complainant to request confidentiality, but will honor and support the complainant's wishes, including for Moored Associates LLC. to fully investigate an incident. By the same token, the Title IX Coordinator will not pressure a complainant to make a full report if the complainant is not ready to.

Requesting Confidentiality: How the School Will Weigh the Request and Respond.

If a complainant discloses an incident to the Title IX Coordinator but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, Moored Associates LLC. must weigh that request against the school's obligation to provide a safe, non-discriminatory environment for all students, including the complainant.

If Moored Associates LLC. honors the request for confidentiality, a complainant must understand that the school's ability to meaningfully investigate the incident and pursue disciplinary action against the alleged respondent(s) may be limited.

Although rare, there are times when Moored Associates LLC. may not be able to honor a complainant's request in order to provide a safe, non-discriminatory environment for all students.

The Title IX Coordinator will evaluate requests for confidentiality. When weighing a complainant's request for confidentiality or that no investigation or discipline be pursued, the Title IX Coordinator will consider a range of factors, including the following:

- The increased risk that the alleged respondent will commit additional acts of sexual misconduct or other violence, such as:
 - whether there have been other sexual misconduct complaints about the same alleged respondent;
 - whether the alleged respondent has a history of arrests or records from a prior school indicating a history of violence;
 - whether the alleged respondent threatened further sexual misconduct or other violence against the complainant or others;
 - whether the sexual misconduct was committed by multiple respondents;
- Whether the sexual misconduct was perpetrated with a weapon;
- Whether the complainant is a minor;
- Whether Moored Associates LLC. possesses other means to obtain relevant evidence of the sexual misconduct (e.g., security cameras or personnel, physical evidence);
- Whether the complainant's report reveals a pattern of perpetration (e.g., via illicit use of drugs or alcohol) at a given location or by a particular group.

The presence of one or more of these factors could lead Moored Associates LLC. to investigate and, if appropriate, pursue disciplinary action. If none of these factors is present, the school will likely respect the complainant's request for confidentiality.

If Moored Associates LLC. determines that it cannot maintain a complainant's confidentiality, the school will inform the complainant prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling the school's response. Moored Associates LLC. will remain ever mindful of the complainant's well-being and will take ongoing steps to protect the complainant from retaliation or harm and work with the complainant to create a safety plan. Retaliation against the complainant, whether by students or school employees, will not be tolerated. Moored Associates LLC. will also:

- assist the complainant in accessing other available complainant advocacy, academic support, counseling, disability, health or mental health services, and legal assistance;
- provide other security and support, which could include issuing a no-contact order, helping arrange a change of course schedules (including for the alleged respondent pending the outcome of an investigation) or adjustments for assignments or tests; and
- inform the complainant of the right to report a crime to local law enforcement – and provide the complainant with assistance if the complainant wishes to do so.

Moored Associates LLC. may not require a complainant to participate in any investigation or disciplinary proceeding.

Moored Associates LLC. is under a continuing obligation to address the issue of sexual violence campus-wide. Reports of sexual violence (including non-identifying reports) will also prompt the school to consider broader remedial action – such as increased monitoring, supervision, or security at locations where the reported sexual violence occurred; increasing education and prevention efforts, including to targeted population groups; conducting climate assessments/ victimization surveys; and/or revisiting its policies and practices.

If Moored Associates LLC. determines that it can respect a complainant's request for confidentiality, the school will also take immediate action as necessary to protect and assist the complainant.

Off-campus Counselors and Advocates

Off-campus counselors, advocates, and health care providers will also generally maintain confidentiality and not share information with Moored Associates LLC. unless the complainant requests the disclosure and signs a consent or waiver form. Contact information for these off-campus resources can be found at the end of this report.

Investigation Procedures and Protocols

The Title IX Coordinator oversees the Institute's investigation, response to, and resolution of all reports of prohibited sexual misconduct, and of related retaliation, involving students, faculty, and staff. The Title IX Coordinator will designate a specially trained investigator (or team of investigators) to interview the complainant, respondent, and any witnesses. The investigator will also gather pertinent documentary materials (if any) and other information.

Notice of Investigation

The Title IX Coordinator will inform the complainant before starting an investigation. The complainant may request that an investigation not be undertaken. The Title IX Coordinator will consider such a request in light of Moored Associates LLC. commitment to provide a safe and non-discriminatory environment for all students. If the Title IX Coordinator determines not to investigate, she will notify the complainant in writing, including that the determination was made at the complainant's request. At the complainant's request, the Title IX Coordinator will also notify the respondent in writing, including that the complainant asked Moored Associates LLC. not to investigate.

The investigator will direct the complainant, respondent, witnesses, and other interested individuals to preserve any relevant evidence.

If an investigation proceeds, Moored Associates LLC. will notify the respondent in writing that a report has been filed. The notice will describe the allegations in the report. The complainant and respondent will be given the opportunity to meet separately with the Title IX Coordinator to review the Policy and these Procedures.

Investigation Process

Moored Associates LLC. process for responding to, investigating, and adjudicating sexual misconduct reports will continue during any law enforcement proceeding. The investigator may need to temporarily delay an investigation while the police are gathering evidence but will resume the investigation after learning that the police department has completed its evidence-gathering and will generally not wait for the conclusion of any related criminal proceeding.

The investigator will interview the complainant, respondent, and any witnesses. They will also gather pertinent documentary materials (if any) and other information.

Investigation Report

The investigator will prepare a report detailing the relevant content from the interviews and the documentation gathered. The burden of proof and gathering evidence sufficient to reach a decision regarding responsibility rest on Moored Associates LLC. and is not on the parties involved. However, both parties have an equal opportunity to present witnesses, including fact and expert witnesses, and other inculpatory and

exculpatory evidence. Neither party is restricted to discuss the allegations under investigation or to gather and present evidence. Both parties have the same opportunity to have others present during the grievance proceeding including an advisor of their choice. The report will include the assessment of individual credibility and recommended findings of responsibility.

The respondent and complainant will each have the opportunity to review and inspect a copy of the investigative report and any other information or evidence that will be used during the disciplinary proceedings at least 10 days prior to the hearing. This information will also be given to the party's advisor if one is appointed for their review and written response. The names and other identifying information of other students will be redacted from such materials in accordance with the Family Educational Rights and Privacy Act (FERPA), except to the extent that doing so would interfere with the purpose of Title IX to eliminate sex-based discrimination. The Title IX Coordinator will supervise this review and ensure that reasonable time is afforded for review prior to the hearing. Each party whose participation is invited or expected will be provided with written notice of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other meetings with sufficient time for the party to prepare to participate.

Time Frame for Investigation

Consistent with the goal to maximize educational opportunities and minimize the disruptive nature of the investigation and resolution, the Title IX Coordinator seeks to resolve all reports in a timely manner. In general, an investigation may last up to 30 days, from receipt of written notice from the complainant of the intent to proceed with an investigation. Adjudication will generally take up to 30 days from the date the investigative report is provided to both the complainant and the respondent. The Title IX Coordinator may set reasonable time frames for required actions under the Policy. Those time frames may be extended for good cause as necessary to ensure the integrity and completeness of the investigation, comply with a request by external law enforcement, accommodate the availability of witnesses, accommodate delays by the parties, account for school breaks or vacations, or address other legitimate reasons, including the complexity of the investigation (including the number of witnesses and volume of information provided by the parties) and the severity and extent of the alleged conduct. Any extension of the timeframes, and the reason for the extension, will be shared with the parties in writing. Best efforts will be made to complete the process in a timely manner by balancing principles of thoroughness and fundamental fairness with promptness.

Where necessary, Moored Associates LLC. will take immediate steps to protect complainants pending the final outcome of an investigation, including academic accommodations and other interim measures. These steps may include the ability to change class schedules; withdraw from/retake a class without penalty; access academic support such as tutoring; issue no contact orders; and change the alleged respondent's class schedule.

Impact of Complainant's Confidentiality Request

A complainant's request for confidentiality will likely limit Moored Associates LLC. ability to investigate a particular matter. The school may take steps to limit the effects of the alleged sexual misconduct and prevent its recurrence without initiating formal action against the alleged respondent or revealing the identity of the student complainant. Examples include: providing increased monitoring, supervision, or security at locations or activities where the misconduct occurred; providing training and education materials for students and

employees; revising and publicizing Moored Beauty Schools' policies on sexual misconduct; and conducting climate surveys regarding sexual misconduct.

Voluntary/Informal Resolution

Voluntary/Informal resolution, when selected by the complainant and deemed appropriate by the Title IX Coordinator, is a path designed to eliminate the conduct at issue, prevent its recurrence, and remedy its effects in a manner that meets the expressed preference of the complainant and the safety and welfare of the Moored Associates LLC.' community. Voluntary/Informal resolution is not appropriate for all forms of conduct under the Policy such as an employee sexually harassing a student.

Moored Associates LLC. retains the discretion to determine, when selected by the complainant, which cases are appropriate for voluntary/informal resolution. If a complainant requests voluntary/informal resolution, and the Title IX Coordinator concludes that voluntary/informal resolution is appropriate, then the Title IX Coordinator will take appropriate action by imposing remedies designed to maximize the complainant's access to all employment, educational, and extracurricular opportunities, and benefits at the school and to eliminate a potential hostile environment. A complainant may request and decide to pursue voluntary resolution at any time. In those cases, in which the voluntary resolution involves either the notification to or participation by the respondent, it is the respondent's decision whether to accept voluntary resolution.

Voluntary/informal resolution may include: conducting targeted or broad-based educational programming or training for relevant individuals or groups; providing increased monitoring, supervision, or security at locations or activities where the misconduct occurred; facilitating a meeting with the respondent with the complainant present (in cases that do not involve sexual assault); and any other remedy that can be tailored to the involved individuals to achieve the goals of the Policy. In some forms of voluntary/informal resolution, the remedies imposed will focus on supporting the complainant with no participation or involvement by the respondent. In other forms of voluntary resolution, the respondent may agree to participate. Depending on the type of remedy used, it may be possible for a complainant to maintain anonymity.

Voluntary/informal resolution may also include restorative principles that are designed to allow a respondent to accept responsibility for misconduct and acknowledge harm to the complainant or to the Moored Associates LLC. community. Restorative models will be used only with the consent of both parties and following a determination by the Title IX Coordinator that the matter is appropriate for a restorative approach.

Moored Associates LLC. will not compel a complainant to engage in mediation, to confront directly the respondent, or to participate in any form of informal resolution. Mediation, even if voluntary, is never appropriate in sexual misconduct cases and will not be used in such cases. As the title implies, participation in voluntary/informal resolution is a choice made in written notice, and either party can request in written notice to end this manner of resolution and pursue an investigation and adjudication at any time, including if voluntary/informal resolution is unsuccessful at resolving the report. Similarly, a complainant can request in written notice to end an investigation and pursue voluntary/informal resolution.

The time frame for completion of voluntary/informal resolution may vary, but Moored Associates LLC. will seek to complete the process within 15 days of the complainant's request. Both parties will be provided written notice disclosing the allegations and requirements of the voluntary/informal resolution process.

Dismissal of a Formal Complaint

Moored Associates LLC. will dismiss the formal complaint if the conduct alleged would not constitute as sexual misconduct under Title IX even if proved, did not occur in the recipients education program or activity, or did not occur against a person in the United States, a complainant notifies the Title IX Coordinator in writing that the complainant would like to withdraw the formal complaint, the respondent is no longer enrolled or employed by Moored Associates LLC., specific circumstances prevent Moored Associates LLC. from gathering evidence sufficient to reach a determination as to the formal complaint.

Adjudication Procedures

If voluntary resolution is not available, Moored Associates LLC. will convene a hearing panel following the end of the investigation. The hearing panel determines whether the respondent is responsible or not responsible for a violation of the Policy. If the respondent is determined to be responsible, the matter proceeds to the sanctions stage.

The hearing panel will generally include the Title IX Coordinator and two additional members who will be individuals associated with Moored Associates LLC.. These additional hearing panel members may include administrators, officers, lawyers or other individuals with relevant experience and special training. Panel members may participate remotely so long as the hearing room is equipped with telephone equipment that allows the panel member to hear all the participants and to be heard by all the participants throughout the hearing proceedings. All panelists will receive training from experts in the field at least once a year. In addition to training on how the adjudicatory process works, the training will include specific instruction about how to approach students about sensitive issues that may arise in the context of sexual misconduct. The complainant and respondent will be informed of the panel's membership before the hearing process begins.

Advisors

Both the complainant and the respondent are entitled to be accompanied to any meeting or proceeding relating to the allegation of sexual misconduct by an advisor or support person of their choice, provided the involvement of such advisor or support person does not result in the postponement or delay of such meeting as scheduled.

Written Submissions

Both the complainant and respondent will have the opportunity to submit written responses to the investigation report and other relevant information to the hearing panel. Each of the complainant and respondent will have the opportunity to review any written submissions by the other. The hearing panel may set reasonable parameters for these written submissions. The hearing panel will review the investigation report and written submissions.

Hearing Procedures

The Title IX Coordinator will, whenever possible, give the complainant and respondent at least five days' advance notice of the hearing. The Title IX Coordinator will arrange to hold the hearing at an off-campus location. The hearing is a closed proceeding, meaning that no one other than the panel members, the complainant and respondent, their respective advisors, witnesses (when called), and necessary Moored Associates LLC. personnel may be present during the proceeding. The Campus Director will work with school staff so that any student whose presence is required may participate in the hearing.

In general, hearings will proceed as follows:

- The Title IX Coordinator may set reasonable time limits for any part of the hearing. Each of the complainant and respondent will have the opportunity to present witnesses and other information consistent with the Policy and these Procedures. The panel may determine the relevance of, place restrictions on, or exclude any witnesses or information. When the complainant and respondent are not able to be present for the hearing panel, arrangements will be made for participation via alternate means.
- In cases where either the complainant or respondent opts not to participate in the hearing, the panel may still hear from the other.
- Additional hearing rules include:
 - Questioning. Only the advisor and panel may ask questions of the complainant and respondent and any witnesses. Both the complainant and respondent will have the opportunity to suggest questions of the other and of witnesses by submitting suggested questions to the panel in writing. The panel may revise or not ask any or all submitted questions.
 - Cross-examination at the live hearing must be conducted directly, orally, and in real time by the party's advisor of choice and never by a party personally.
 - At the request of either party, Moored Associates LLC. will provide for the live hearing to occur with the parties located in separate rooms with technology enabling the decision maker(s) and parties to simultaneously see and hear the party or the witness answering the questions.
 - Information Regarding Romantic or Sexual History. The panel will not consider the romantic or sexual history of either the complainant or respondent in cases involving allegations of sexual misconduct, except for testimony offered by one or the other about the complainant's and respondent's shared sexual history that the panel deems relevant. If such information is offered by the complainant or respondent, the other has the right to respond. The existence of a prior consensual dating or sexual relationship between the complainant and respondent by itself does not support an inference of consent to alleged sexual misconduct.
 - Only relevant cross examination and other questions may be asked of a party or witness. The decision maker must first determine whether the question is relevant and explain any decision to exclude a question as not relevant.
 - If a party does not have an advisor present at the live hearing, Moored Associates LLC. will provide without a fee an advisor, but is not required to be an attorney, to conduct cross examination on behalf of that party.
 - Prior Conduct Violations. The hearing panel will not consider the respondent's prior conduct violations, unless the investigator provided that information to the hearing panel because the respondent was previously found to be responsible, and the previous incident was substantially similar to the present allegation(s) and/or the information indicates a pattern of behavior by the respondent.
 - If a party or witness does not submit to cross-examination at the live hearing, the decision maker(s) must not rely on any statement of that party or witness in reaching a determination regarding responsibility.

Moored Associates LLC. will keep an audio recording of the hearing for the use of the panel, for sanctioning, and for purposes of appeal. The panelists may request a transcript of the recording. Cell phones and recording devices may not be used in the hearing room(s) unless approved by the panel in advance.

Panel Determinations/Standard of Proof

The panel will use “preponderance of the evidence” as the standard of proof to determine whether a violation of the Policy occurred. Preponderance of the evidence means that a panel must be convinced based on the information it considers that the respondent was more likely than not to have engaged in the conduct at issue in order to find the respondent responsible for violating the Policy. The panel will find a student responsible, or not responsible, based on a majority vote. The panel / decision maker(s) cannot be the Title IX Coordinator or the investigator(s) and must issue a written determination regarding responsibility. The panel will generally render a decision within 10 days in writing to both parties after the conclusion of a hearing. The panel’s decision will include an explanation of the basis for the decision, identification of the allegations, a description of the procedural steps taken from starting from the formal complaint to the determination, findings of facts supporting the determination, conclusions regarding the application of the recipient's code of conduct to the facts; a statement of, and rational for, the results as to each allegation; and the schools procedures and permissible bases for the complainant and respondent to appeal. If the panel finds the respondent responsible, the matter will proceed to the sanctions stage.

Sanctions and Other Remedies

The Title IX Coordinator, with the advice and counsel of the other hearing panel members, shall be responsible for imposing sanctions that are:

- Fair and appropriate given the facts of the particular case;
- Consistent with Moored Beauty Schools’ handling of similar cases;
- Adequate to protect the safety of the campus community; and
- Reflective of the seriousness of sexual misconduct.

The Title IX Coordinator will consider relevant factors, including if applicable: (1) the specific sexual misconduct at issue (such as penetration, touching under clothing, touching over clothing, unauthorized recording, etc.); (2) the circumstances accompanying the lack of consent (such as force, threat, coercion, intentional incapacitation, etc.); (3) the respondent’s state of mind (intentional, knowing, bias-motivated, reckless, negligent, etc.); (4) the impact of the offense on the complainant; (5) the respondent’s prior disciplinary history; (6) the safety of the Moored Associates LLC. community; and (7) the respondent’s conduct during the disciplinary process.

The Title IX Coordinator will render a sanctioning decision within five days following the receipt of the panel’s determination. The sanctioning decision will be communicated in writing to the complainant and the respondent.

Moored Associates LLC. may impose any one or more of the following sanctions on a student determined to have violated the Policy:

- Reprimand/warning
- Changing the respondent’s academic schedule
- Disciplinary probation
- Restricting access to Moored Associates LLC. facilities or activities
- Community service
- Issuing a “no contact” order to the respondent or requiring that such an order remain in place

- Dismissal or restriction from Moored Associates LLC. employment
- Suspension (limited time or indefinite)
- Expulsion

In addition to any other sanction (except where the sanction is expulsion), Moored Associates LLC. may require any student determined to be responsible for a violation of the Policy to receive appropriate education and/or training related to the sexual misconduct violation at issue. Moored Associates LLC. may also recommend counseling or other support services for the student.

Whatever the outcome of the hearing process, a complainant may request ongoing or additional accommodations and the Title IX Coordinator will determine whether such measures are appropriate.

Potential ongoing accommodations include:

- Providing an escort for the complainant
- Changing the complainant's academic schedule
- Allowing the complainant to withdraw from or retake a class without penalty
- Providing access to tutoring or other academic support, such as extra time to complete or re-take a class

Moored Associates LLC. may also determine that additional measures are appropriate to respond to the effects of the incident on the school community. Additional responses for the benefit of the Moored Associates LLC. community may include:

- Increased monitoring, supervision, or security at locations or activities where the misconduct occurred
- Additional training and educational materials for students and employees
- Revision of Moored Associates LLC. policies relating to sexual misconduct
- Climate surveys regarding sexual misconduct

Appeals

Either the respondent or the complainant or both may appeal the determination of the hearing panel and/or the sanctions. Appeals are decided by the owner of Moored Associates LLC.. The three grounds for appeal are:

1. A procedural error affecting the determination or sanction;
2. New information that was not available at the time of the investigation or hearing and that may change the determination or sanction; and
3. Excessiveness or insufficiency of the sanction.
4. The Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias that affected the outcome

Disagreement with the finding or sanctions is not, by itself, grounds for appeals.

The appealing student must submit the appeal in writing to the Owner of Moored Associates LLC. within five days after receiving the sanctioning notice. If either the complainant or respondent submits an appeal, the Title IX Coordinator will notify the other that an appeal has been filed and the grounds of the appeal. The non-appealing student may submit a written response within five days after notice of an appeal.

If the owner concludes that a change in the hearing panel's determination is warranted, the owner may enter a

revised determination, reconvene the panel to reconsider the determination, or return the matter for additional investigation. After consultation with the Title IX Coordinator, the Owner may also change the sanction. If both the complainant and respondent appeal, the appeals will be considered concurrently.

The Owner will notify the complainant and respondent of the final decision in writing. Appeals decisions will be rendered within 15 days after the receipt of the written appeal. All appeal decisions are final.

Records Disclosure

Disciplinary proceedings conducted by Moored Associates LLC. are subject to the Family Educational Records and Privacy Act (FERPA), a federal law governing the privacy of student information. FERPA generally limits disclosure of student information outside Moored Associates LLC. without the student's consent, but it does provide for release of student disciplinary information without a student's consent in certain circumstances. Records of any actions, including any supportive measures or informal resolutions will be maintained for seven years.

Any information gathered in the course of an investigation may be subpoenaed by law enforcement authorities as part of a parallel investigation into the same conduct or required to be produced through other compulsory legal process.

Retaliation Prohibited

No recipient or other person may intimidate, threaten, coerce, or discriminate against any individual for the purposes of interfering with any right or privilege secured by Title IX or, because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in a Title IX investigation, proceeding, or hearing. Except as otherwise noted in the regulations, the recipient must keep confidential the identity of any individual who has made a report or complaint of sex discrimination, including any complainant, any individual who has been reported by the perpetrator of sex discrimination, any respondent, and any witness. Charging an individual with a code of conduct violation for making a materially false statement in bad faith in the course of a grievance proceeding does not constitute retaliation, provided however, that a determination regarding responsibility, alone, is not sufficient to conclude that any party made a materially false statement in bad faith.

Amendments

Moored Associates LLC. may amend its Sexual Misconduct Policies & Procedures from time to time. Nothing in such policies or procedures shall affect the inherent authority of the school to take such actions as it deems appropriate to further the educational mission or to protect the safety and security of the school community.

Drug-Free Campus And Workplace Alcohol & Drug Policy

Moored Associates LLC. is in compliance with the Drug Free Schools and Communities Act of 1989 (Public Law 101-226). All students and employees should refer to the "Drug & Alcohol Prevention Information" given to each student at orientation for information concerning the campus policies and individual responsibilities required under the act.

The campus will provide to each student upon enrollment a clear written notice with information on the penalties associated with drug-related offenses. This information is given to each student during orientation. The National Minimum Drinking Age Act of 1984 required all states to raise their minimum purchase and public possession of alcohol to age 21.

Standards Of Conduct For A Drug Free Campus

1. Moored Associates LLC., hereafter referred to as “this institution”, has a policy of maintaining a Drug-Free Workplace. All students and employees are hereby notified that the unlawful manufacture, distribution, dispensing, possession or use of controlled substances (drugs and alcohol) is prohibited in this institution’s campus/workplace.
2. In compliance with the Drug-Free Workplace Act of 1988, this institution’s “Campus/Workplace” consists of the following locations of each individual campus:
 - a.) The entire college/salon facility and its parking lot.
 - b.) Any location used for an off-site school function, i.e., competition, hair show, graduation, etc.
 - c.) Students and employees must comply with the policy while off-site if they are participating in any activities with or on behalf of this institution in any capacity.
3. Non-compliance with the terms in Paragraph 1 (above) will result in the following actions being taken by this institution.
 - a.) Notification to the proper law enforcement authorities.
 - b.) Termination of enrollment/employment.
4. All students and employees must read and understand the following statement:
 - a.) I understand that Moored Associates LLC., by participating in Title IV Federal Aid, must establish a policy of a Drug-Free Campus/Workplace, and as a student/employee of Moored Beauty Schools, I must acknowledge and agree to abide by the terms of Paragraph 1 (above).
 - b.) I must notify the School Director/Owner of any criminal drug statute conviction of a violation occurring on the campus/workplace within five calendar days after such conviction.
 - c.) I understand that this institution has established a Drug-Free Awareness Program to inform students and employees about:
 - The dangers of drug abuse in the campus/workplace.
 - This institution’s policy of maintaining a Drug-Free Campus/Workplace.
 - Any available drug counseling, rehabilitation, and student/employee assistance programs.
 - The penalties that may be imposed upon student/employees for drug abuse violations occurring in the campus/workplace (see paragraph 3 above).

If a student is convicted of any criminal drug activities, enrollment will be terminated at that time. If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any activity with Moored Associates LLC., the student must report the conviction, in writing, within 5 calendar days of the conviction to the management of Moored Associates LLC..

Drug & Alcohol Awareness

Description Of Health Risks Associated with Alcohol

Alcohol consumption causes a number of marked changes in behavior. Even low doses significantly impair the judgment and coordination required to drive a car safely, increasing the likelihood of an accident.

Low-to-moderate doses of alcohol may also increase the incidence of a variety of aggressive acts, including spouse and child abuse. Moderate-to-high doses of alcohol may cause marked impairments to higher mental functions, severely altering a person’s ability to learn and remember information. Very high doses may cause

respiratory depression and death. If combined with other depressants of the central nervous system, much lower doses of alcohol will produce the effects just described.

Repeated use of alcohol can lead to dependence. Sudden cessation of alcohol intake is likely to produce withdrawal symptoms, including severe anxiety, tremors, hallucinations, and convulsions. Alcohol withdrawal can be life-threatening. Long-term consumption of large quantities of alcohol, particularly when combined with poor nutrition, can also lead to permanent damage to vital organs such as the brain and the liver. Mothers who drink alcohol during pregnancy may give birth to infants with fetal alcohol syndrome. These infants have irreversible physical abnormalities and mental retardation. In addition, research indicated that children of alcoholic parents are at greater risk of becoming alcoholics than other youngsters.

Sanctions for Violating Drug & Alcohol Laws

Federal Penalties & Sanctions for Illegal Possession Of A Controlled Substance

- 1st Conviction: Up to 1 year imprisonment and fined at least \$1,000 but not more than \$100,000 or both
- After 1 prior drug conviction: At least 15 days in prison, not to exceed 2 years, and fined at least \$2,500 but not more than \$250,000, or both
- After 2 or more drug convictions: At least 90 days in prison, not to exceed 3 years, and fined at least \$5,000 but not more than \$250,000 or both
- Special sentencing provisions for possession of crack cocaine: Mandatory at least 5 years in prison, not to exceed 20 years, and fined up to \$250,000, or both if:
 - 1st convictions and amount of crack possessed exceeds 5 grams.
 - 2nd crack conviction and the amount of crack possessed exceed 3 grams.
 - 3rd or subsequent crack conviction and the amount of crack possessed exceeds 1 gram.
- Forfeiture of personal and real property used to possess or to facilitate possession of a controlled substance if that offense is punishable by more than 1 year of imprisonment. (See special sentencing provisions re: crack.)
- Forfeiture of vehicles, boats, aircraft, or any other conveyance used to transport or conceal a controlled substance.
- Civil fine of up to \$10,000 (pending adoption of final regulations)
- Denial of federal benefits such as student loans, grants, contracts, and professional and commercial licenses, up to 1 year for first offense and up to 5 years for second and subsequent offenses.
- Ineligible to receive or purchase a firearm.
- Revocation of certain federal licenses and benefits (e.g. pilot licenses, public housing tenancy, etc.) are vested within the authorities of individual federal agencies.

Federal Trafficking Penalties for Illegal Distribution Of A Controlled Substance

- Methamphetamine (10-99 gm, or 100-199 gm mixture)
- Heroin (100-999 gm mixture)
- Cocaine/Cocaine Base (500-4,999 gm mixture (Cocaine))/5-49 gm mixture (Cocaine Base))
- Phencyclidine (PCP) (10-99 gm or 100-999 gm mixture)
- LSD (1-10 gm mixture)
- Fentanyl/Fentanyl Analogue (40-399 gm mixture (Fentanyl))/10-99 gm mixture (Fentanyl Analogue))
- Marijuana (Mixture containing detectable quantity) (100-1,000 kg; or 100-999 plants)

1. First Offense: Not less than 5 years; not more than 40 years. If death or serious injury, not less than 20 years; not more than life. Fine of not more than \$2 million individual, \$5 million other than individual.
 2. Second Offense: Not less than 10 years; not more than life. If death or serious injury, not less than life. Fine of not more than \$4 million individual, \$10 million other than individual.
- Methamphetamine (100gm or more, or 1 kg or more mixture)
 - Heroin (1 kg or more mixture)
 - Cocaine/Cocaine Base (5 kg or more mixture (Cocaine))/50 gm or more mixture (Cocaine Base))
 - Phencyclidine (PCP) (200 gm or more, or 1 kg or more mixture)
 - LSD (10 gm or more mixture)
 - Fentanyl/Fentanyl Analogue (400 gm or more mixture (Fentanyl)/100 gm or more mixture (Fentanyl Analogue))
 - Marijuana (Mixture containing detectable quantity) (1,000 kg or more; or 1,000 or more plants)
 1. First Offense: Not less than 10 years; not more than life. If death or serious injury, not less than 20 years; not more than life. Fine of not more than \$4 million individual, \$10 million other than individual
 2. Second Offense: Not less than 20 years; not more than life. If death or serious injury, not less than life. Fine of not more than \$8 million individual, \$20 million other than individual.
 - Marijuana (Less than 50 kg)
 - Hashish/Hashish Oil (Less than 10 kg (Hashish)/ less than 1 kg (Hashish Oil))
 1. First Offense: Not more than 5 years. Fine of not more than \$250,000 individual, \$1 million other than individual.
 2. Second Offense: Not more than 10 years. Fine of not more than \$500,000 individual, \$2 million other than individual.
 - Marijuana (50-100 kg; or 50-99 plants)
 - Hashish/Hashish Oil (10-100 kg (Hashish)/1-100 kg (Hashish Oil))
 1. First Offense: Not more than 20 years. If death or serious injury, not less than 20 years; not more than life. Fine of no more than \$1 million individual, \$5 million other than individual.
 2. Second Offense: Not more than 30 years. If death or serious injury, not less than life. Fine of no more than \$2 million individual, \$10 million other than individual.

State Penalties & Sanctions

There are legal sanctions under state law for the unlawful possession, use, or distribution of illicit drugs and alcohol. A violation under state law may result in a misdemeanor or felony conviction, depending on the nature of the offense, punishable by imprisonment, payment of fines, confiscation or real and personal property, or a combination of the three.

Description Of Health Risks Associated with Drug Use

Drugs	Physical Dependence	Psychological Dependence	Possible Effects
Narcotics			
Heroin	High	High	• Euphoria • Drowsiness • Respiratory Depression • Constricted Pupils • Nausea
Morphine	High	High	
Codeine	Moderate	Moderate	
Hydrocodone	High	High	
Hydromorphone	High	High	
Oxycodone	High	High	
Methadone & LAAM	High	High	
Fentanyl & Analogs	High	High	
Other Narcotics	High-Low	High-Low	
Depressants			
Chloral Hydrate	Moderate	Moderate	• Slurred Speech • Disorientation • Drunken Behavior without Odor of Alcohol
Barbiturates	High-Moderate	High-Moderate	
Benzodiazepines	Low	Low	
Glutethimide	High	Moderate	
Other Depressants	Moderate	Moderate	
Stimulants			
Cocaine	Possible	High	• Increase Alertness • Euphoria • Increased Pulse Rate & Blood Pressure • Excitation • Insomnia • Loss of Appetite
Amphetamine / Methamphetamine	Possible	High	
Methylphenidate	Possible	High	
Other Stimulants	Possible	High	
Marijuana	Unknown	Moderate	• Euphoria
Tetrahydrocannabinol	Unknown	Moderate	• Relaxed Inhibitions
Hashish & Hashish Oil	Unknown	Moderate	• Disorientation
Hallucinogens			
LSD	None	Unknown	
Mescaline & Peyote	None	Unknown	
Amphetamine Var.	Unknown	Unknown	• Illusions & Hallucinations
Phencyclidine & Analogs	Unknown	High	• Altered perception of Time & Distance
Testosterone	Unknown	Unknown	• Virilization

Cypionate, Enanthate			● Acne
Nandrolone			● Testicular Atrophy
(Decanoate Phenpropionate)	Unknown	Unknown	● Gynecomastia ● Aggressive Behavior
Oxymetholone	Unknown	Unknown	● Edema

Emergency Procedures

Building Emergency Plan

The Building Emergency Plan establishes the procedure for all students and employees in case of an emergency that occurs at Moored Associates LLC.. This plan is simple and should be followed by everyone in the building to ensure safe evacuation from the building.

Fire or Other Indoor Emergency:

The following steps must be followed in sequence:

1. Alert students, employees and clients that there is a fire or other emergency.
2. The CSA should dial 911 immediately. Confirm and advise them that there is a fire (or other emergency). If time allows describe the nature and location of the fire or other emergency within the building. State the location of the school, either:
 - Twin City Beauty College located at 2600 Lincoln Avenue, Saint Joseph, MI
 - Michiana Beauty College located at 7321 Heritage Square, Suite 160, Granger, IN
 - Traverse City Beauty College located at 920 Hastings, Suite D, Traverse City, MI
 - Tulip City Beauty College located at 500 East 8th St., Suite 500, Holland, MI
 - Nuvo College of Cosmetology located at 919 W. Norton Avenue, Norton Shores, MI 49441
3. Make sure ALL students, clients and employees evacuate the building safely, if deemed necessary. Ensure all special needs persons are provided necessary assistance. Remain alert to your surroundings. Be particularly alert to anyone or condition that might pose a danger to evacuees. If you encounter a hazard evaluate your situation and adjust your evacuation route accordingly.
4. If the fire is small, use a portable extinguisher located throughout the building. These are all-purpose "ABC" extinguishers.
5. If the fire is large, and time permits, shut down all electrical equipment and appliances. Close all interior and exterior doors and windows as you exit but do not lock them.
6. Exit the building and move to the far side of the parking lot at Traverse City Beauty College, the north side at Twin City Beauty College, the east parking lot at Michiana Beauty College, the front at Tulip City Beauty College and the back at Nuvo College of Cosmetology. This allows the CSA to be able to confirm everyone has exited the building safely. The CSA should assign one employee to meet the responding fire department with a master key to allow firefighters quick entry.
7. Once you reach your evacuation site, search the site for suspicious objects and adjust accordingly.
8. Supervise students under your care.
9. Do not attempt to reenter the facility unless the campus director or his/her designee directs you to do so.

Tornado/Storm or Other Outdoor Emergency

1. Electrical Storm: CSA will make any decisions as to whether electrical equipment and appliances should be turned off and/or unplugged. All persons should stay away from any faucets or plumbing and avoid contact with any electrical equipment appliances.
2. Tornado: Assuming there is sufficient warning, shut off all electrical equipment and appliances and evacuate clients, students, and employees. If there is NOT sufficient warning, take shelter immediately against the interior wall in the hallway between the clinic and classrooms or in one of the interior offices, basement, closets, or restrooms. Stay away from windows and glass doors to avoid the danger of injury from flying glass. Close all windows and doors. Listen to local radio or television news for instructions from emergency management and public safety officials. Review emergency evacuation protocols.

Chemical Spill

1. Close down all operations and ask all persons to evacuate. Remain calm and do not unnecessarily alarm clients.
2. If time permits (based on the hazard) perform an orderly shutdown of all electrical equipment.

Emergency Lockdown

1. Make sure entrance points to the building near your location are locked immediately
2. If you are located in an area with a door that can be locked, gather all students in the vicinity into the room and lock the door.
3. Improvise additional door locking if possible.
4. Close blinds and cover additional windows, e.g., with a shirt, up turned table, paper, etc.
5. Turn off lights in the room.
6. If gunshots are heard, lie on the floor and try to use available resources for additional cover.
7. If fire alarm is activated during lockdown, proceed with extreme caution.
8. If possible, report your status to campus director by telephone.
9. Do not open the door for people claiming to be public safety personnel unless you have an opportunity to view photo identification or are instructed to do so by a staff member whom you recognize.

External Lockdown

1. Make sure designated entrance points to the building near your location are locked immediately.
2. Remain in classroom.
3. If possible, report your status to the campus director by telephone.
4. Continue with normal activities as much as the situation allows.
5. If students and staff have a need to move about in the building, obtain permission first from the campus director or designee.
6. Be prepared to rapidly implement an emergency evacuation or emergency lockdown – if directed to do so or if circumstances indicate you should do so.

Campus Emergency Notification

In the event of an emergency the CSA or their designee will post a campus wide emergency notification. The decision to issue an emergency notification and what information to post will be made on a case by case basis by the CSA or their designee. The CSA or their designee will be responsible for confirming the significance,

danger and immediate threat to the safety and security of the college community. This emergency notification will be made without delay unless issuing a notification will in the professional judgment of the responsible authorities compromise efforts to assist complainants or to contain, respond to, or otherwise mitigate the emergency. In such a case the notification may be delayed. Any notifications to the larger community will be authorized by the CSA or their designee. For a dangerous situation and immediate threat the students, faculty, staff, and visitors will be directed to a safe location. Communication of the emergency notification may include any or all of the following options: e-mail, messaging, emergency phone alert system, college website, verbal communication, posted notices in buildings and/or local media. Regular updates and notifications will be sent in the same and/or additional methods as the original message.

Timely Warnings

Timely warnings are required for the crimes specific to the Clery Act including violent crimes as well as any threat to persons or property. Depending on the particular circumstances of the crime a timely warning may be issued. The decision to issue a timely warning will be made on a case by case basis. Moored Associates LLC. will use multiple resources to collect information that may necessitate a timely warning. Information obtained at the campus, or while monitoring police radio transmissions, as well as police incident reports sent to us by our neighboring jurisdictions provides the information we need to determine if there is a threat to our campus requiring a timely warning. The Campus Director or designee will determine what type of information will be included in the timely warning, and will likewise be responsible for issuing the warning. Various methods will be used to communicate with students, faculty, staff and visitors of a timely warning. These methods may include any or all of the following options: e-mail, text messaging, emergency phone alert system, college website, verbal communication, posted notices in buildings and/or local media.

Daily Crime Log

Moored Associates LLC. are required to maintain a Daily Crime Log (DCL) at each location. The DCL includes reports of all crimes not just Clery Act crimes. Information is recorded on the log within two days of the crime being reported regardless of how much time has passed since the crime was committed. Information that is prohibited by law or would jeopardize the confidentiality of the complainant will not be included in the crime log. The Campus Director is responsible for maintaining the daily crime log.

The DCL includes the type of incident, the date reported, the date and time occurred, the general location and the disposition if known.

The DCL is available for inspection upon request during operational hours of the campus.

Crime Information

Crime Incidents by Type

1. Criminal Homicide
 - A) Murder/Non-Negligent Manslaughter
 - B) Negligent Manslaughter
2. Sexual Harassment
3. Sexual Assault
4. Sexual Violence
5. A) Forcible Sex Offenses by Type
 - Forcible Rape
 - Forcible Sodomy
 - Sexual Assault with an Object
 - Forcible FondlingB) Non Forcible Sex Offenses by Type
 - Incest
 - Statutory Rape
6. Gender Based Harassment
7. Bystander Intervention
8. Robbery
9. Aggravated Assault
10. Burglary
11. Motor Vehicle Theft
12. Arson
13. Hate Crimes
 - Larceny/Theft
 - Simple Assault
 - Intimidation
 - Destruction/Damage/Vandalism of Property
14. Law Violations
 - Weapons Possession
 - Drug Law Violation
 - Liquor Law Violation
15. Domestic Violence
16. Dating Violence
17. Credible Treat
18. Cyber Stalking
19. Stalking

Definitions For Crimes

1. **CRIMINAL HOMICIDE:** These offenses are separated into two categories: Murder Non-Negligent Manslaughter and Negligent Manslaughter.
 - A) **Murder and Non-negligent Manslaughter:** The willful (non-negligent) killing of one human being by another.
 - B) **Negligent Manslaughter:** Killing of another person through gross negligence.
2. **SEXUAL HARASSMENT:** Conduct on the basis of sex that satisfies one or more of the following:
 - 1) An employee of the recipient conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct.
 - 2) Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the recipient's education program or activity; or
 - 3) "Sexual assault," "dating violence," "domestic violence," or "stalking" as defined for VAWA purposes listed below.

Actual Knowledge: Notice of sexual harassment or allegations of sexual harassment to a recipient's Title IX Coordinator or any official of the recipient who has authority to institute corrective measures on behalf of the recipient.

Complainant: An individual who is alleged to be the complainant of conduct that could constitute sexual harassment.

Respondent: An individual who has been reported to be the respondent of conduct that could constitute sexual harassment.

Formal Complaint: A document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the recipient investigate the allegation of sexual harassment.
3. **SEXUAL ASSAULT:** An offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's UCR program.
4. **SEXUAL VIOLENCE:** Includes any one incident of:
 - 1) Sexual Battery, defined as a lewd or lascivious act, in the presence of a person younger than 16 years of age.
 - 2) Luring or enticing a child
 - 3) Sexual performances by a child
 - 4) Any other forcible felony wherein a sexual act is committed or attempted regardless of whether criminal charges based on the incident were filed, reduced, or dismissed by the state attorney.
5. **A) FORCIBLE SEX OFFENSES:** Any sexual act directed against another person, forcibly and/or against the person's will; not forcibly or against the person's will when the victim is incapable of giving consent. There are four types of forcible sex offenses:
 - Forcible Rape - The penetration, no matter how slight, of the vagina, or anus with any body part, or object, or oral penetration by a sex organ of another person without consent of the victim including instances where the victim is incapable of giving consent because of his or her age or because of his or her temporary or permanent mental incapacity.
 - Forcible Sodomy - Oral or anal sexual intercourse with another person, forcibly and or against the person's will.

- Sexual Assault with an Object - The use of an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, forcibly and/or against the person's will including instances where the victim is incapable of giving consent because of his or her age or because of his or her temporary or permanent mental incapacity.
- Forcible Fondling - The touching of the private parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his or her age or because of his or her temporary or permanent mental incapacity.

B) NON-FORCIBLE SEX OFFENSES: Unlawful, non-forcible sexual intercourse. There are two types of offenses included in this definition:

- Incest - Non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- Statutory Rape - A non-forcible sexual intercourse with a person who is under the statutory age of consent.

6. **GENDER-BASED HARASSMENT:** Verbal, nonverbal, graphic, or physical aggression, intimidation, or hostile conduct based on sex, sex-stereotyping, sexual orientation, or gender identity, but not involving conduct of a sexual nature, when such conduct is sufficiently severe, persistent, or pervasive that it interferes with or limits a person's ability to participate in or benefit from the education or work programs or activities.
7. **BYSTANDER INTERVENTION:** The term bystander intervention refers to safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene in situations of potential harm when there is a risk of domestic violence, dating violence, sexual assault, or stalking against a person other than the individual. Effective bystander intervention training prepares participants to recognize situations of potential harm, overcome barriers to intervening, identify safe and effective intervention options, and take action.
8. **ROBBERY:** Taking or attempting to take anything of value from the care, custody or control of a person or persons by force or threat of force or violence and/or by putting the complainant in fear.
9. **AGGRAVATED ASSAULT:** An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.
10. **BURGLARY:** The unlawful entry of a structure to commit a felony or theft.
11. **MOTOR VEHICLE THEFT:** Motor Vehicle Theft includes the theft or attempted theft of a motor vehicle.
12. **ARSON:** Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property or another, etc.
13. **HATE CRIMES:** A hate crime is a criminal offense committed against a person or property which is motivated in whole or in part by the offenders bias. Bias is a performed negative opinion or attitude toward a group of persons based on their race, gender, religion, disability, sexual orientation or ethnicity/national origin.
 - **LARCENY/THEFT:** The unlawful taking, carrying, leading, or riding away of property from the possession, or constructive possession of another.

- **SIMPLE ASSAULT:** An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.
- **INTIMIDATION:** To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the complainant to actual physical attack.
- **DESTRUCTION/DAMAGE/VANDALISM OF PROPERTY:** To willfully or maliciously destroy, injure, disfigure, or deface any public or private property, real or personal, without the consent of the owner or person having custody or control of it.

14. **LAW VIOLATIONS:**

- **WEAPONS: CARRYING, POSSESSING, ETC.:** The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices, or other deadly weapons. This classification encompasses weapon offenses that are regulatory in nature.
- **DRUG ABUSE VIOLATIONS:** The violation of laws prohibiting the production, distribution and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance. Arrests for violations of state and local laws, specifically those in relation to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs.
- **LIQUOR LAW VIOLATIONS:** The violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession or use of alcoholic beverages, not including driving under the influence and drunkenness.

15. **DOMESTIC VIOLENCE:** A felony or misdemeanor crime of violence committed by any of the following individuals:

- A current or former spouse or intimate partner of the complainant; or
- A person with whom the complainant has a child in common; or
- A person who is cohabitating with or has cohabitated with the complainant as a spouse or intimate partner; or
- A similarly situated to a spouse of the complainant under the domestic or family laws of the jurisdiction in which the crime of violence occurred; or
- Any other person against an adult or youth complainant who is protected under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred

16. **DATING VIOLENCE:** Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the complainant.

- The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.
- For the purpose of this definition, dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
- Dating violence does not include acts covered under the definition of domestic violence.

17. **CREDIBLE TREAT:** A verbal or nonverbal threat, or a combination of the two, including threats delivered by electronic communication or implied by a pattern of conduct, which places the person who is the

target of the threat in reasonable fear for his or her safety, or the safety of his or her family members or individuals closely associated with the person, and which is made with the apparent ability to carry out the threat to cause such harm. It is not necessary to prove that the person making the threat had the intent to actually carry out the threat. The present incarceration of the person making the threat is not a bar to prosecution under this section.

18. **CYBER STALK:** To engage in a course of conduct to communicate, or to cause to be communicated, words, images, or language by or using electronic mail or electronic communication, directed at a specific person, causing substantial emotional distress to the person, and serving no legitimate purpose. A person who willfully, maliciously, and repeatedly follows, harasses, or cyber stalks another person and makes a credible threat to that person commits the offense of aggravated stalking.
19. **STALKING:** Engaging in a course of conduct directed at a specific person that would cause a reasonable person to:
- Fear for the person's safety or the safety of others; or
 - Suffer substantial emotional distress

For purposes of this definition:

- Course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by an action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.
- Reasonable person means a reasonable person under similar circumstances and with similar identities to the complainant.
- Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

Crime Statistics

The federal law requires that colleges and universities disclose crime statistics on the previous three years and contains crime data that may occur on-campus, on non-campus property, or on public property adjacent to the campus. For the purpose of the Clery Act, any building that is owned or controlled by the institution or is located on property that is owned or controlled by the institution, and is within the reasonably contiguous geographic area that makes up the campus is classified by the FBI Uniform Crime Report.

CAMPUS CRIME STATISTICS for Tulip City, Twin City, Traverse City, and Michiana Beauty College

Category	<u>On-Campus</u>			<u>Non-Campus/Public Property</u>		
	2022	2023	2024	2022	2023	2024
Criminal Offenses						
Murder & Non-Negligent Manslaughter	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0
Sex Offenses						
Rape	0	0	0	0	0	0
Fondling	0	0	0	0	0	0
Incest	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0
VAWA Offenses						
Domestic Violence	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0
Sexual Assault	0	0	0	0	0	0
Stalking	0	0	0	0	0	0
Arrests and Disciplinary Actions						
Weapons	0	0	0	0	0	0
Drug Abuse Violations	0	0	0	0	0	0
Liquor Law Violation	0	0	0	0	0	0
Hate Crimes						
2022	No Hate Crimes Reported			No Hate Crimes Reported		
2023	No Hate Crimes Reported			No Hate Crimes Reported		
2024	No Hate Crimes Reported			No Hate Crimes Reported		

CAMPUS CRIME STATISTICS for Nuvo College of Cosmetology

Category	<u>On-Campus</u>			<u>Non-Campus/Public Property</u>		
	2022	2023	2024	2022	2023	2024
Criminal Offenses						
Murder & Non-Negligent Manslaughter	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0

Sex Offenses						
Rape	0	0	0	0	0	0
Fondling	0	0	0	0	0	0
Incest	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0
VAWA Offenses						
Domestic Violence	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0
Sexual Assault	0	0	0	0	0	0
Stalking	0	0	0	0	0	0
Arrests & Disciplinary Actions						
Weapons	0	0	0	0	0	0
Drug Abuse Violations	0	0	0	0	0	0
Liquor Law Violations	0	0	0	0	0	0
Hate Crimes						
2022	No Hate Crimes Reported			No Hate Crimes Reported		
2023	No Hate Crimes Reported			No Hate Crimes Reported		
2024	No Hate Crimes Reported			No Hate Crimes Reported		

Resource Information

Michiana Beauty College Sources of Help

Police Departments	Alcohol/Drug Treatment Centers	General Counseling
<i>Edwardsburg Police Department</i> 26926 Main Street Edwardsburg, MI 49112 Ph. 269-663-8444	<i>Alcohol Treatment 24 Hr. Natl. Helpline</i> 877-219-1777	<i>Samaritan Counseling Center</i> 17195 Cleveland Rd South Bend, IN 46635 Ph. 574-277-0274
<i>Mishawaka Police Dept.</i> 200 N Church Street Mishawaka, IN 46544 Ph. 574-258-1688	<i>Community Healing Centers</i> 1221 S 11 th Street #101 Niles, MI 49120 Ph. 269-684-7741	<i>Family Psychology of South Bend</i> 115 S Saint Peter St. South Bend, IN 46617 Ph. 574-280-8199
Fire Departments	<i>Recovery Connections – Michiana</i> 1715 E Bristol St. Elkhart, IN 46514 Ph. 574-262-3231	<i>Summit Counseling Services</i> 928 E Wayne St South Bend, IN 46617 Ph. 574-234-1990
<i>Harris Twp. Fire Dept.</i> 13981 State Rd. 23 Granger, IN 46530 Ph. 574-272-3874		
<i>Mishawaka Fire Station 2</i> 2332 N Main St Mishawaka, IN 46545 Ph. 574-258-1697	<i>Occupational Rehabilitation</i> 4609 Grape Rd #B7 Mishawaka, IN 46545 Ph. 574-271-1779	<i>Reaching Out Counseling</i> 140 W Mishawaka Rd Elkhart, IN 46517 Ph. 574-361-2189
Hospitals	Alcohol/Drug Support Groups	Poison Control
<i>St. Joseph Regional Med Center</i> 611 E. Douglas Rd. #401 Granger, IN 46530 Ph. 574-335-6242	<i>Counseling Associates</i> 310 W McKinley Ave #360 Mishawaka, IN 46545 Ph. 574-255-8132	800-222-1222
		Shelters

		<i>Faith Mission of Elkhart</i> 801 Benham Ave Elkhart, IN 46516 Ph. 574-293-3406
<i>Memorial Hospital of South Bend</i> 615 N Michigan St South Bend, IN 46601 Ph. 574-647-1000	<i>Alcoholics Anonymous</i> 814 E Jefferson Blvd South Bend, IN 46617 Ph. 574-234-7007	Women's Shelters
		<i>Family Justice Center</i> 533 N. Niles Ave. South Bend, IN 46617 Ph. 574-234-6900 24 Hr Crisis Line 574-289-4357
<i>Unity Medical & Surgical Hospital</i> 4455 Edison Lakes Pkwy #100 Mishawaka, IN 46545 Ph. 574-231-6800	<i>Madison Center</i> 309 Pin Oak Cir Mishawaka, IN 46545 Ph. 574-257-3795	<i>YWCA Women's Shelter</i> 1102 S. Fellows St. South Bend, IN 46601 Ph. 574-233-9491
Elkhart General Hospital 600 East Blvd Elkhart, IN 46514 Ph. 574-294-2621	<i>Crossroads Counseling</i> 2319 Edison Rd South Bend, IN 46615 Ph. 574-233-4183	For more information Check the Directory of Community Services (United Way), the Yellow Pages or the phone directory.

Traverse City Beauty College Sources of Help

Police Departments	Alcohol/Drug Treatment Centers	General Counseling
<i>Traverse City Police Dept.</i> 851 Woodmere Ave Traverse City, MI 49686 Ph. 231-995-5150	<i>Alcohol Treatment 24 Hour Natl. Helpline – 877-219-1777</i>	<i>Great Lakes Counseling PC</i> 697 Hannah Ave Traverse City, MI 49686 Ph. 231-932-2292
<i>Garfield Twp. Community Police</i> 3848 Veterans Dr. Traverse City, MI 49684 Ph. 231-941-9222	<i>Addiction Treatment Svc</i> 116 E 8 th Street Traverse City, MI 49684 Ph. 231-929-0415	<i>Old Town Psychological Services</i> 512 S Union St Traverse City, MI 49684 Ph. 231-941-6550
Fire Departments	<i>Al-Anon Family Groups</i> 3512 Lookout Pt Traverse City, MI 49686 Ph. 231-938-7399	<i>Nexus Family Services</i> 522 Oak Ridge Dr. W. Traverse City, MI 49684 Ph. 231-943-7312
<i>Grand Traverse Metro Fire Dept.</i> 897 Parsons Rd. Traverse City, MI 49686 Ph. 231-947-3000		
<i>Garfield Twp. Fire Dept.</i> 3000 Albany St Traverse City, MI 49684 Ph. 231-941-7682	<i>Impact Weekend</i> 104 S. Union Ste. 202 Traverse City, MI 49684 Ph. 231-935-0171	Poison Control
		800-222-1222
		Shelters
Hospitals	Alcohol/Drug Support Groups	<i>Women's Resource Center</i> 720 S Elmwood Ave #2 Traverse City, MI 49684

<i>Munson Healthcare</i> 1105 6 th Street Traverse City, MI 49684 Ph. 231-935-5000	<i>Bay Area Counseling LLC</i> 3180 Racquet Club Dr. Ste. G Traverse City, MI 49684 Ph. 231-933-4009	Ph. 231-941-1210 24 Hr. Crisis 800-554-4972
<i>Community Hospital Family Practice Clinic</i> 4062 W Royal Dr. Traverse City, MI 49684 Ph. 231-935-8130	<i>Alcoholics Anonymous</i> 124 N Division St Traverse City, MI 49684 Ph. 231-946-8823	<i>Third Level – a program of CFS</i> 3785 Veterans Dr Traverse City, MI 49684 Ph. 231-922-4800
<i>Traverse Health Clinic</i> 1719 S Garfield Ave Traverse City, MI 49686 Ph. 231-935-0799	<i>Catholic Human Services</i> 1000 Hastings St Traverse City, MI 49686 Ph. 231-947-8110	For more information Check the Directory of Community Services (United Way), the Yellow Pages or the phone directory.
	<i>DBMJ Rehab Services</i> 4099 Hidden Creek Dr. Traverse City, MI 49684 Ph. 231-421-1329	

Tulip City Beauty College Sources of Help

Police Departments	Alcohol/Drug Treatment Centers	General Counseling
<i>Holland Police Dept.</i> 89 W 8 th Street Holland, MI 49423 Ph. 616-355-1100	<i>Alcohol Treatment 24 Hour Natl. Helpline</i> 866-647-8493	<i>Beacon of Hope</i> 225 W 30 th Street Holland, MI 49424 Ph. 616-594-5380
Fire Departments	<i>OAR Inc.</i> 483 Century Lane Holland, MI 49424 Ph. 616-396-5284	<i>Bethany Christian Services</i> 11335 James Street Holland, MI 49424 Ph. 616-396-0623
<i>City of Holland Fire Department</i> 279 Kollen Park Dr. Holland, MI 49423 Ph. 616-335-1020		
<i>Holland Charter Township Offices</i> 353 120 th Ave Holland, MI 49424 Ph. 616-396-2345	<i>Behavioral Health Services</i> (Child & Adolescent) 854 S. Washington Avenue Holland, MI 49423 Ph. 616-355-3926	<i>Center for Family Development</i> 347 Hoover Blvd. Holland, MI 49423 Ph. 616-392-7695
Hospitals	<i>Pine Rest Lakeshore Clinics</i> 926 Washington Ave Ste. 210 Holland, MI 49423 Ph. 616-820-3780	<i>Connections Counseling & Life Coaching Services</i> 36 West 8 th Street Ste. 250 Holland, MI 49423 Ph. 616-392-6116
<i>Holland Hospital</i> 602 Michigan Avenue Holland, MI 49423 Ph. 616-392-5141		
<i>Holland Hospital Rehab Service /Evergreen Commons</i> 480 State St.	<i>Lakeshore Counseling Service</i> 220 Hoover Blvd Holland, MI 49423	Poison Control

Holland, MI 49423 Ph. 616-355-3861	Ph. 616-355-2525	800-222-1222
Zeeland Spectrum Health Hospital 8333 Felch Street Zeeland, MI 49464 Ph. 616-772-4644	Alcohol/Drug Support Groups	Shelters
	<i>Al-Anon</i> 201 E. 39 th Street Holland, MI 49423 Ph. 616-396-3111	<i>Family Hope Ministry Center</i> 349 Fairbanks Avenue Holland MI 49423 Ph. 616-396-2200
<i>N. Ottawa Community Hospital</i> 1309 Sheldon Rd Grand Haven, MI 49417 Ph. 616-842-3600	<i>Alcoholics Anonymous</i> 201 E 39 th St. Holland, MI 49423 Ph. 616-392-3360	<i>Center for Women in Transition</i> 411 Butternut Dr. Holland, MI 49424 Ph. 616-392-2829
For more information Check the Directory of Community Services (United Way), the Yellow Pages or the phone directory.	<i>Narcotics Anonymous Alano Bldg.</i> PO Box 1592 Holland, MI 49424 Ph. 616-836-4070	<i>Sylvia's Place</i> PO Box 13 Allegan, MI 49010 Ph. 269-673-8700

Twin City Beauty College Sources of Help

Police Departments	Alcohol/Drug Treatment Centers	General Counseling
<i>St. Joseph City Police</i> 700 Broad St. St. Joseph, MI 49085 Ph. 269-983-2571	<i>Alcohol Treatment 24 Hour Natl Helpline 877-355-0928</i>	<i>Samaritan Counseling Center</i> 1850 Colfax Ave. Benton Harbor, MI 49022 Ph. 269-926-6199
<i>St. Joseph Twp. Police</i> 3000 Washington Ave St. Joseph, MI 49085 Ph. 269-429-6890	<i>Alano House of Southwest Michigan</i> 4162 Red Arrow Hwy Stevensville, MI 49127 Ph. 269-429-9153	<i>Shepherd House Counseling and Psychological Services PC</i> 107 N Broadway St Cassopolis, MI 49031 Ph. 269-445-0999
Fire Departments	<i>Community Healing Ctr.</i> 1221 S. 11 th St. Ste. 101 Niles, MI 49120 Ph. 269-684-7741	<i>Freedom Counseling Center</i> 1901 Niles Ave Ste. 102 St. Joseph, MI 49085 Ph. 269-982-7200
<i>St. Joseph Fire Dept.</i> 923 Broad St. St. Joseph, MI 49085 Ph. 269-983-1442		
Hospitals	<i>Harbortown Treatment Center</i> 1022 E. Main St. Benton Harbor, MI 49022 Ph. 269-926-0015	Poison Control
Spectrum Health Lakeland Medical Center 1234 Napier Ave Saint Joseph, MI 49085 Ph. 269-983-8300		800-222-1222
<i>Intercare Community Health</i> 800 M 139	Alcohol/Drug Support Groups	Shelters
		<i>McKinney Project for Homeless Children and Youth</i> 996 N. Shore Dr.

Benton Harbor, MI 49022 Ph. 855-869-6900	<i>Al-Anon of Berrien County</i> 4162 Red Arrow Hwy Stevensville, MI 49127 Ph. 269-428-3310	Benton Harbor, MI 49022 Ph. 269-925-3811
<i>Berrien County Health Dept</i> 2149 E Napier Ave Benton Harbor, MI 49022 Ph. 269-926-7121	<i>Alcoholics Anonymous</i> 514 Eagle St. Niles, MI 49120 Ph. 269-684-5304	<i>Safe Shelter Inc.</i> 996 N. Shore Dr. Benton Harbor, MI 49022 Ph. 269-925-9500
	<i>Shoreline Consultation</i> 2519 Niles Ave Saint Joseph, MI 49085 Ph. 269-926-8389	<i>Emergency Shelter Service Inc.</i> 645 Riverview Dr. Benton Harbor, MI 49022 Ph. 269-925-1131
		For more information Check the Directory of Community Services (United Way), the Yellow Pages or the phone directory.

Nuvo College of Cosmetology Sources of Help

Police Departments	Alcohol/Drug Treatment Centers	General Counseling
<i>Address:</i> 4814 Henry St, Muskegon, MI 49441 <i>Departments:</i> <i>City of Norton</i> <i>Shores</i> <i>Phone:</i> (231) 733-2691	<i>Alcohol Treatment 24 Hour Natl Helpline 877-355-0928</i>	<u>Behavioral Health Group of Muskegon</u> No reviews · Counselor 84 S Seaway Dr Open · Closes 5PM · (231) 733-9800 Medicare/Medicaid accepted
	Michigan Rehab Center 231-722-2013 Rehabilitation	<u>West Michigan Psychological Services</u> 5.0 (2) · Mental health clinic 3611 Henry St Open · Closes 5PM · (231) 237-8898 Medicare accepted
Fire Departments		<u>Shores Counseling</u>
<u>Norton Shores Fire Department</u> <u>Station 3</u> 5.0	<u>Alano Club</u> 5.0 (5) · Alcoholism treatment program 4613 Henry St · (231) 798-9901	5.0 (2) · Psychologist 433 Seminole Rd # 110 · In Seminole Shores Professional Plaza (231) 739-8800

(3) · Fire station Norton Shores, MI · (231) 798-2255 Open 24 hours	Open · Closes 9PM	
Hospitals	<u>Eastside Outpatient Services</u>	Poison Control
<u>Hagley Hospital Inc</u> No reviews · Hospital 3535 Park St #110 · In Trinity Health Lab - Norton Shores	2.7 (15) · Addiction treatment center Muskegon, MI · (231) 739-4359 Closed · Opens 6:30AM Tue	800-222-1222
	<u>Alcohol/Drug Support Groups</u>	Shelters
<u>Mercy Health Urgent Care</u> 3.0 (2) · Hospital Muskegon County, 3570 Henry St · (231) 672-7	<u>Behavioral Health Group of Muskegon</u> No reviews · Social worker 84 S Seaway Dr · (231) 733-9800 Open · Closes 5PM Medicare/Medicaid accepted	Every Woman's Place 231-759-7909 Women's shelter, clothing Family Promise 231-747-8855 Family shelter in area churches
		Rescue Mission 231-727-6090 Shelter
		For more information Check the Directory of Community Services (United Way), the Yellow Pages or the phone directory.

On Campus Geography

9/12/22, 12:44 PM

Google Maps

Google Maps



<https://www.google.com/maps/@43.1901204,-86.2664391,179m/data=!3m1!1e3>

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Nuvo College of Cosmetology



