

**March 23, 2021**

To Whom It May Concern:

I am writing this letter on behalf of my dear friend, Drew Smith. My name is Pastor Eric Church and I have known Drew since he was a young man. Drew has confided in me about the allegations that have been made against him and with his permission, I am writing to you as a servant of the lord and a concerned friend.

Drew is a well respected, highly trusted, and active member of our church. He is one of the few young men that participated in running kid's church. Parents trust him with their small children. I have only known Drew to be honest, kind, and respectful. I know in my heart his is not capable of doing the terrible things that he has been accused of doing.

Please consider this letter and be guided to the truth.

All my best,

*Pastor Church*



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\*This document is intended for educational purposes only. It is designed solely to facilitate an understanding of the investigation process.

**April 11, 2021 at 06:47:05 Eastern Daylight Time**

**Subject:** Response to Evidence

**Date:** Friday, September 10, 2021 at 6:45:44 AM Eastern Daylight Time

**From:** Taylor Doe

**To:** Kevin Ware; Abby Plates

Dear Investigator Plates and Ware,

I have reviewed the evidence in the draft investigative record and these are my responses:

1. My relationship with Witness 3 is no body's business and has nothing to do with this. Drew is trying to distract everyone from the real issue by slut shaming me.
2. About the sleeping arrangements. I completely forgot about that text exchange, but clearly it happened. I also don't remember ever saying that I "was looking forward to a good snuggle." That isn't something I would say. But even if I did, asking to snuggle does not equal consent to have sex when I am passed out and throwing up.
3. Drew is claiming that I texted him to come back to the room. That is absolutely not true. I was in no condition to text anyone. If I was, why wouldn't I have texted Kelly back when she was freaking out and looking for me?
4. I was not completely fine or sobered up when we was having sex with me. I don't remember most of it, but I do remember that I was so drunk that I threw up in the middle of it and that he was moving my body around the way he wanted it because I didn't have control over it myself.
5. I am not making this up because I am mad that he got back together with Lauren. I never wanted to be with him in the first place and if I had wanted to, I could have been. I did find out that they got back together because she texted me a few days after the formal to tell me that they were back together and that I should respect their relationship. I found the messages and will send them. They make clear that I didn't care that they were back together.

Thank you,  
taylor

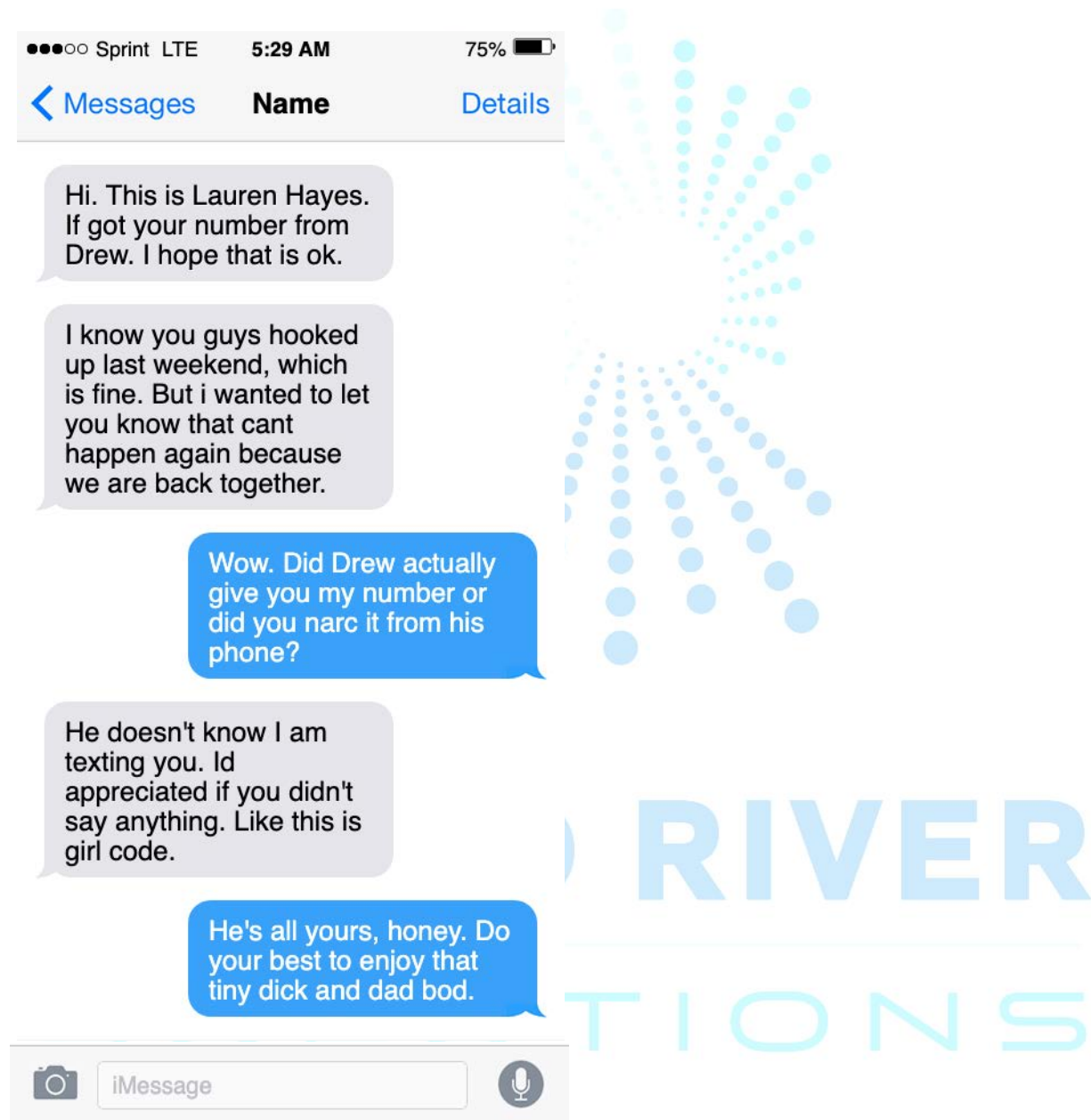
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Screen Shots of Text Messages between Complainant and Witness 7

Messages obtained from Witness 1's cellular device by Investigator Ware

*Date and Time Stamps indicate that the first six exchanges occurred on November 12, 2020 between 9:22pm and 9:14pm.*



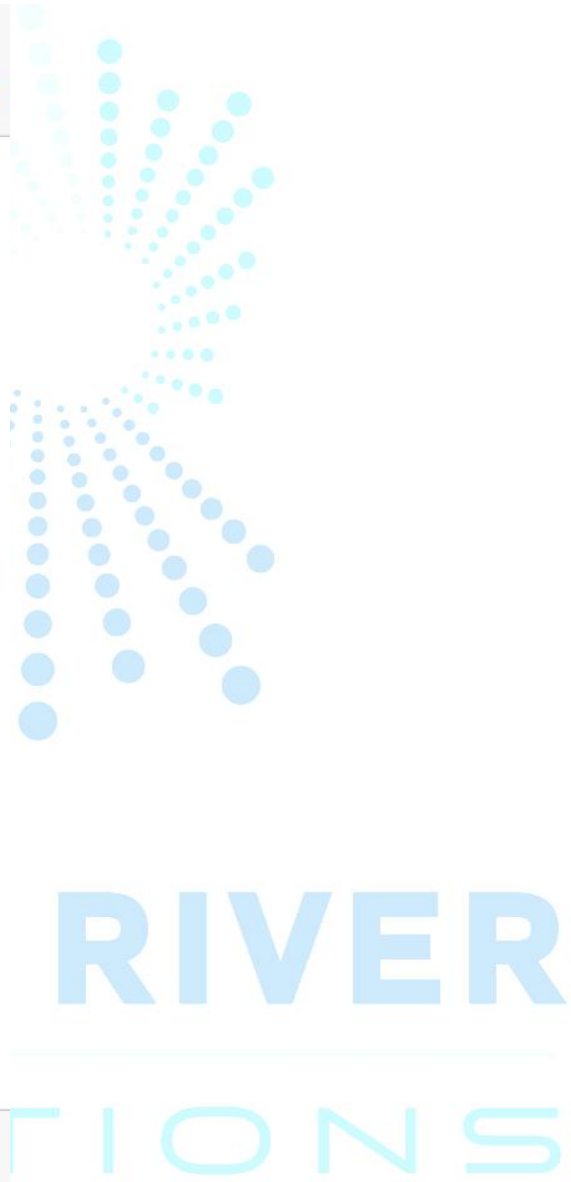
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Screen Shots of Text Messages between Complainant and Respondent

Screen Shots of Messages were submitted by Respondent to Investigator Plates, via email.

Date and time stamps were not provided.



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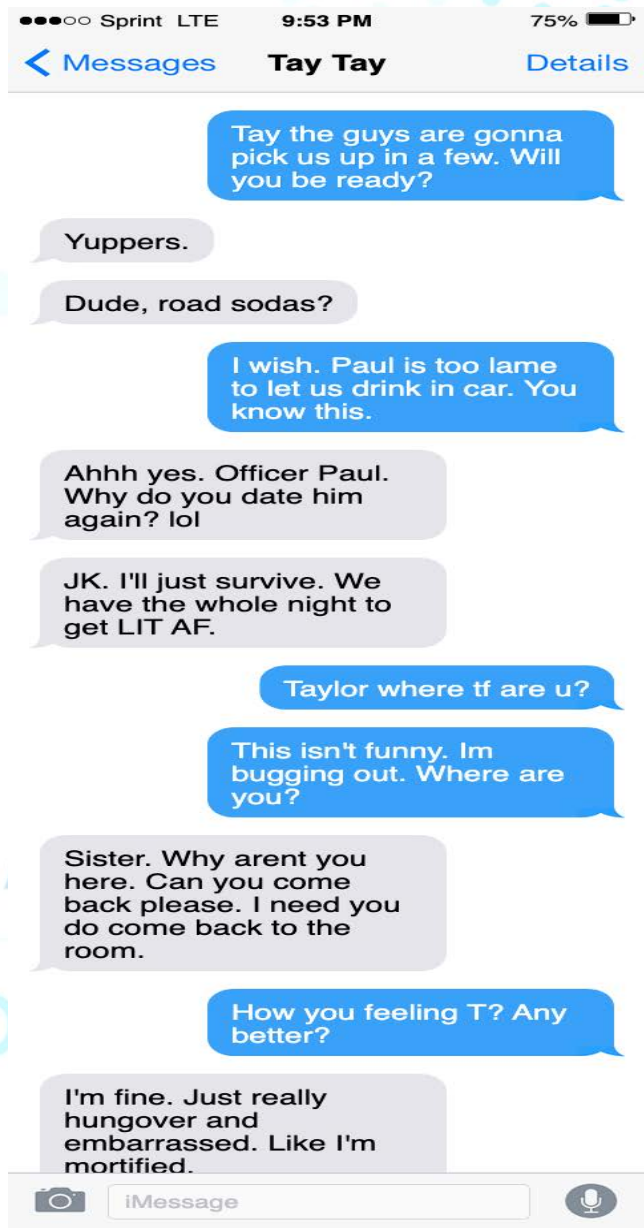


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Screen Shots of Text Messages between Complainant and Witness 1  
Messages obtained from Witness 1's cellular device by Investigator Ware

Date and Time Stamps indicate that the first six exchanges occurred on October 31, 2020 between 3:04pm and 3:07pm. The 7<sup>th</sup> and 8<sup>th</sup> exchange were sent on November 1, 2020 at 2:46am and 2:59am. The 9<sup>th</sup> exchange was sent on November 1, 2020 at 8:42am. The 10<sup>th</sup> was sent November 1, 2020 between 4:18pm and the final message was sent on November 1, 2020 at 8:12pm.



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Screen Shots of Text Messages between Respondent and Witness 5  
Messages obtained from Witness 5's cellular device by Investigator Plates  
*Date and Time Stamps indicate that exchanges occurred on November 1, 2020  
between 2:37am and 2:53am.*



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## FORMAL COMPLAINT OF A VIOLATION OF GRAND RIVER UNIVERSITY'S TITLE IX POLICY/SEXUAL MISCONDUCT POLICY

*Cherie Shipper, Title IX Coordinator*, prepared this Formal Complaint for the purpose of providing notice of the following allegations of Prohibited Conduct and its date, time, and location, to the extent known: Rape, as defined in section V(3) of the Sexual Misconduct Policy.

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1. Taylor Doe (the "Complainant") is an UNDERGRADUATE student at Grand River University
2. The Complainant is signing this statement because they believe Drew Smith (the "Respondent"), an UNDERGRADUATE student violated the Sexual Misconduct Policy's prohibition against Rape during the early morning hours of November 1, 2020 while at Grand River Country Club, a building owned and controlled by the University.
3. Alleged Misconduct:

It is alleged that Respondent violated Grand River Solution's Sexual Misconduct Policy's prohibition against Rape, as defined in section V(3) of the Sexual Misconduct Policy. Specifically, it is alleged that during the early morning hours of November 1, 2020 while at the Grand River Country Club, which is a building owned and controlled by Grand River University, Respondent engaged in conduct constituting Rape, as defined in section V(3) of the Sexual Misconduct Policy. Specifically, Complainant has reported that Respondent penetrated Complainant's vagina with his penis when Complainant was incapacitated by alcohol and therefore incapable of providing affirmative consent.

Complainant Signature(s)

By signing below, I agree the above information is accurate, to the best of my knowledge:

Complainant Name: Taylor Doe Signature: Taylor Doe. Date: 3/1/21

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By signing below, I am indicating I wish to proceed with a formal investigation under Grand River University Sexual Misconduct Policy

Complainant Name: Taylor Doe Signature: Taylor Doe. Date: 3/1/21

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By signing below, I am indicating I am open resolving this matter through Informal Resolution:

Complainant Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Please indicate:

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**Formal Complaint on behalf of the *College/University*.**

Pursuant to the [Applicable Policy]: "Where the Title IX Coordinator determines that the *College/University* cannot honor a complainant's request that no Formal Complaint be pursued under these procedures, the Title IX Coordinator will promptly initiate the resolution process under these procedures by making a signed, written Formal Complaint on behalf of the *College/University*."

Title IX Coordinator: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## NOTICE OF ALLEGATIONS AND FORMAL INVESTIGATION

March 2, 2021

Taylor Doe

SENT VIA EMAIL TO: *t DOE3@gru.edu*

RE: Case No 0011 Investigation of Possible Violations of the University Sexual Misconduct Policy

Dear Taylor:

On March 1, 2021, you filed a written Formal Complaint in accordance with the University's Title IX office alleging that Drew Smith engaged in conduct constituting a violation the University's Sexual Misconduct Policy. A copy of signed Formal Complaint is attached. This letter contains information regarding these allegations, the investigation and hearing process that will be used, your rights during these processes, and resources available to you. Although this letter is lengthy, it contains important information. You are encouraged to read this letter carefully and in its entirety.

### ALLEGATIONS AND APPLICABLE POLICY

The Formal Complaint alleges that Respondent engaged in conduct prohibited by section V3 of the Sexual Misconduct Policy entitled Rape and is defined as follows:

*Rape is 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.*

Specifically, it is alleged that during the early morning hours of November 1, 2020 while at the Grand River Country Club, which is a building owned and controlled by Grand River University, Respondent engaged in conduct constituting Rape, as defined in section V(3) of the Sexual Misconduct Policy. Specifically, Complainant has reported that Respondent penetrated Complainant's vagina with his penis when Complainant was incapacitated by alcohol and therefore incapable of providing affirmative consent.

This policy may be found online at: [www.GRU.edu/titleix](http://www.GRU.edu/titleix)

## THE INVESTIGATION PROCESS

Abby Plates and Kevin Ware have been assigned to conduct this investigation and will be in contact with you shortly to arrange an interview. If you believe there is an actual conflict of interest regarding the ability of this investigator to conduct this investigation, or if you are aware of any actual bias by the Investigator, please notify me within 3 days so that I may evaluate the concern and determine whether any actual bias or conflict of interest exists, and, if appropriate, I will assign a different investigator. You also have the right to challenge my role as Title IX Coordinator, on the basis of a conflict of interest or actual bias. Objections to my serving in that role shall be made, in writing, to Marcia Hill, Vice President of Everything. The deadline to do so is March 7, 2021.

An investigation conducted by pursuant the Sexual Misconduct Policy is an administrative process and not a legal proceeding. Please note that the Title IX office is a neutral entity that does not represent either side in a complaint investigation process. The purpose of the investigation is to gather information and evidence related to the allegations and then, following a hearing, determine whether the alleged conduct occurred and if so, whether the conduct might point to a violation of University policies.

During the investigation process, the investigator will seek to interview you and gather all of the information and evidence that is reasonably available and directly related to the alleged conduct, determine which of the information and evidence is relevant to the allegations made, and then provide you with an opportunity to review, and comment upon, all of the evidence gathered that is directly related to the allegations. During this process you will be provided with an opportunity to identify witnesses and submit information to the investigator, and you and your advisor (if you have one) will



have an opportunity to review and respond to all of the statements, information, documents and material gathered during the investigation that the investigator has determined is directly related to the allegations.

This office strives to complete the investigation process within 120 CALENDAR days. Should this timeline need to be extended, you will be notified of the need for an extension along with the reason for the extension and the new date of completion.

At the conclusion of the investigation, the investigator will write a report that will summarize all the relevant evidence. You and your advisor will be provided with a copy of this report and will have 10 business days to provide a response. This is not an opportunity to provide additional evidence, but instead an opportunity to respond to the investigator's report. The investigator's report along with your response will be provided to you and to the Decision Maker(s) for inclusion in the hearing process. This will conclude the investigation stage of the process.

## THE HEARING PROCESS

At the conclusion of the investigation stage of the process, a hearing will be held. The hearing may be conducted either in-person, or virtually via web/video conference. The purpose of the hearing is to allow the Decision Maker(s) to determine factual relevance, determine any inconsistencies or errors that occurred during the investigation process, determine credibility of those interviewed and reliability of evidence provided, allow the parties an opportunity to question each other (through an Advisor) about information directly related to the allegation(s), and to determine by a preponderance of the evidence whether the University policy has been violated.

A Decision Maker(s) who is responsible for determining whether University policy was violated will be assigned, and you will be provided with the name of the Decision Maker(s). If you believe there is a conflict of interest regarding the ability of the Decision Maker(s) to conduct the hearing, or if you are aware of any actual bias by the Decision Maker(s), please notify me within three [3] days so that I may evaluate the concern and determine whether any demonstrated bias or actual conflict of interest exists, and, if appropriate, a different Decision Maker(s) will be assigned.



During the hearing, you may be questioned about information directly related to the allegation(s). In accordance with Title IX policy and procedure, both the Decision Maker(s) and the Advisor of the other party may pose questions to you, the other party, the investigator, and witnesses. You may also, through your Advisor, pose questions to the other party, the investigator and witnesses. However, you are not permitted to ask the question of the other person yourself. Your questions are only permitted to be asked by an advisor chosen by you. Your advisor at the hearing may be the same advisor you had during the investigation process or can be another individual. If you do not have someone who can serve as an advisor during the hearing, one will be for the purpose of articulating your questions, but not to represent or advocate on your behalf.

At the conclusion of the hearing, the Decision Maker(s) will write a report containing factual findings, and a determination as to whether or not University policy has been violated. If the Decision Maker(s) determines that there was a violation of University policy, an appropriate sanction will be determined. You will be notified in writing of the Decision Maker's decision including any sanction as appropriate.

#### **YOUR RIGHT TO APPEAL**

Following Decision Maker's decision, you will have the right to appeal the decision and the sanction, if applicable, based on one or more of the following:

- A. Procedural irregularity that affected the outcome of the matter;
- B. New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; or,
- C. The Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

#### **Rights and Expectations During the Investigation and Hearing Processes**

During the investigation and hearing processes you have the following rights and can expect the following:

- Expect to be treated respectfully throughout the process by everyone with a role in the investigation and hearing process; and, that action will be taken by the Title IX Coordinator should any individual with a role in the process compromise the integrity of the investigation and hearing process and/or treat others in the process in a manner that harasses, threatens or otherwise discourages participation.
- That Respondent will be treated without presumption of responsibility for the alleged conduct during the investigation and hearing processes, and that any determination of responsibility will be made only at the end of the investigation and adjudication process.
- Request supportive measures be provided. Supportive measures are non-punitive steps available to you during the course of the investigation and adjudication process and designed to preserve equal access to University programs and activities. Support measures may include measures such as counseling, extensions of deadlines or other modifications to academic or work schedules or environment, leaves of absence, campus escort services, and mutual restrictions on contact between you and others engaged in the investigation and adjudication processes.
- Have an advisor of your choosing present in person or virtually with you when you are interviewed and at any meeting or proceeding that is part of the investigation and resolution process. Your advisor may be any person including an attorney. Please note that during the investigation process, while the advisor may provide support and guidance, they may not speak on your behalf or otherwise actively participate in or disrupt the investigation process. However, during any hearing process related to the resolution of this matter, your advisor will have the opportunity to question witnesses and the other party.
- Decide not to participate in an interview with the investigator or in the hearing process and not have that decision held against you during the investigation or hearing. If you choose not to participate, the investigation and hearing will

proceed and findings and conclusions made will be based on the information available.

- Provide evidence related to the allegations to the investigator, including relevant identifying witnesses who can be interviewed, and suggest questions that the investigator may pose to others interviewed.
- Have 10 business days to review information gathered by the investigator that is directly related to the allegations and respond to that information including providing additional information including the names of witnesses, suggesting the investigator pose additional questions to those already interviewed or new witnesses.
- Have access to a copy of the draft report at the conclusion of the investigation and will have 10 days to provide a response; this is not an opportunity to provide additional evidence, but instead any opportunity to respond to the draft report.
- Participate in a hearing, and have an advisor provided, if you do not have one, for purposes of asking questions of the other party, or of witnesses.
- Receive a copy of the hearing report.
- Be informed of the hearing officer's determination of policy violations and any resulting sanction.
- Exercise your right to appeal any sanctions as well as the hearing officer's decision, if any, on grounds permitted under in the Title IX Policy.

## TRUTHFULNESS IN THE INVESTIGATION AND HEARING PROCESS

Each party and every witness is expected to provide truthful information to the investigator, Hearing Officer, and the appeals officer. Please be advised that the policy prohibits knowingly making false statements or knowingly submitting false information during this process.

## A NOTE ABOUT MEDICAL RECORDS

Submitting medical information and records as part of the investigation and hearing process may have implications beyond these processes. If you intend to submit medical records as evidence in either the investigation or hearing process, please inform the investigator of your intent before you provide them with the records so that the investigator can discuss the implications of submitting such records with you.

## SAFEGUARDING OF PRIVACY

The University will protect the privacy of individuals involved in the investigation and hearing processes to the extent permitted by law and University policy. In order to conduct a thorough investigation, there may be times during the investigation that require the investigator and/or Decision Maker(s) to share information related to the allegations with individuals participating in these processes. Additionally, disclosure of certain information following the investigation and/or hearing may be necessary in order to apply or implement any sanction or discipline that may result from a finding of a violation to University policy.

All individuals involved in the investigation process are asked to keep the information learned during the investigation private throughout the course of the investigation. In order to protect the integrity of the investigation, no copies of documents or information learned during the course of the investigation are to be made or shared with anyone or any third party other than the investigator, your advisor, your parent(s) or guardian(s), or one of the confidential resources listed below. Further, any witnesses involved in the investigation are asked to keep information learned during the investigation confidential and to not share such information with any third party.

## A NOTE REGARDING RETALIATION

Please be aware that University policy strictly prohibits retaliation against anyone engaging in the protected activity of raising a concern about possible discrimination or harassment, or against anyone participating in the resolution of a complaint of discrimination or harassment. You are encouraged to avoid any behavior that could reasonably be interpreted as retaliatory by anyone participating in the resolution of this process. Additionally, in an effort to protect the integrity of the investigation process



and the privacy of both parties I also recommend that during the course of the investigation process you refrain from discussing what you learn through the investigation with anyone other than the investigator, your advisor, your parent(s) or guardian(s), one of the confidential resources listed below, and me.

If you believe you have experienced retaliation under this policy, please contact the Title IX Coordinator who will forward any complaint of retaliation to the appropriate office for handling.

### INFORMAL RESOLUTION PROCESS

You may propose that the formal complaint be resolved using the Informal Resolution process. The Informal Resolution process may be used up until a final determination regarding a policy violation is made by the Decision Maker. To engage the Informal Resolution process, contact the Title IX Coordinator at email. Please note that the Informal Resolution process is a voluntary, and either party may choose to end the Informal Resolution process at any time until both parties agree, in writing, to a resolution. For more information, please contact the Title IX Coordinator.

### RESOURCES

If you would like confidential assistance or support, information about our resources can be found here: [www.gru.edu/titleix/support](http://www.gru.edu/titleix/support).

Please contact me as soon as possible if you have disability-related needs and wish to request reasonable accommodations to ensure your full participation in this process.

If you have any questions about this investigation, or University policies, or the content of this notice, please do not hesitate to contact me.

Respectfully,  
Cherie Shipper  
Title IX Coordinator

cc: Kevin Ware  
Abby Plates

## NOTICE OF ALLEGATIONS AND FORMAL INVESTIGATION

March 2, 2021

Drew Smith

SENT VIA EMAIL TO: *Dsmith@gru.edu*

RE: Case No 0011 Investigation of Possible Violations of the University Sexual and Gender-Based Misconduct and Other Forms of Interpersonal Violence Policy ("Sexual Misconduct Policy")

Dear Drew:

On March 1, 2021, Taylor Doe filed a written Formal Complaint in accordance with the University's Title IX office alleging that you engaged in conduct constituting a violation the University's Sexual Misconduct Policy. A copy of signed Formal Complaint is attached. This letter contains information regarding these allegations, the investigation and hearing process that will be used, your rights during these processes, and resources available to you. Although this letter is lengthy, it contains important information. You are encouraged to read this letter carefully and in its entirety.

### ALLEGATIONS AND APPLICABLE POLICY

The Formal Complaint alleges that you engaged in conduct prohibited by section V3 of the Sexual Misconduct Policy entitled Rape and is defined as follows:



*Rape is 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.*

Specifically, it is alleged that during the early morning hours of November 1, 2020 while at the Grand River Country Club, which is a building owned and controlled by Grand River University, Respondent engaged in conduct constituting Rape, as defined in section V(3) of the Sexual Misconduct Policy. Specifically, Complainant has reported that Respondent penetrated Complainant's vagina with his penis when Complainant was incapacitated by alcohol and therefore incapable of providing affirmative consent.

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Abby Plates and Kevin Ware has been assigned to conduct this investigation and will be in contact with you shortly to arrange an interview. If you believe there is an actual conflict of interest regarding the ability of this investigator to conduct this investigation, or if you are aware of any actual bias by the Investigator, please notify me within [3] days so that I may evaluate the concern and determine whether any actual bias or conflict of interest exists, and, if appropriate, I will assign a different investigator. You also have the right to challenge my role as Title IX Coordinator, on the basis of a conflict of interest or actual bias. Objections to my serving in that role shall be made, in writing, to Marcia Hill, Vice President of Everything. The deadline to do so is March 7 2021.

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to the allegations and then, following a hearing, determine whether the alleged conduct occurred and if so, whether the conduct might point to a violation of University policies.

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the purpose of articulating your questions, but not to represent or advocate on your behalf.

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compromise the integrity of the investigation and hearing process and/or treat others in the process in a manner that harasses, threatens, or otherwise discourages participation.

- That Respondent will be treated without presumption of responsibility for the alleged conduct during the investigation and hearing processes, and that any determination of responsibility will be made only at the end of the investigation and adjudication process.
- Request supportive measures be provided. Supportive measures are non-punitive steps available to you during the course of the investigation and adjudication process and designed to preserve equal access to University programs and activities. Support measures may include measures such as counseling, extensions of deadlines or other modifications to academic or work schedules or environment, leaves of absence, campus escort services, and mutual restrictions on contact between you and others engaged in the investigation and adjudication processes.
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- Receive a copy of the hearing report.
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- Exercise your right to appeal any sanctions as well as the hearing officer's decision, if any, on grounds permitted under in the Title IX Policy.

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If you believe you have experienced retaliation under this policy, please contact the Title IX Coordinator who will forward any complaint of retaliation to the appropriate office for handling.

## INFORMAL RESOLUTION PROCESS

You may propose that the formal complaint be resolved using the Informal Resolution process. The Informal Resolution process may be used up until a final determination regarding a policy violation is made by the Decision Maker. To engage the Informal Resolution process, contact the Title IX Coordinator at email. Please note that the Informal Resolution process is a voluntary, and either party may choose to end the Informal Resolution process at any time until both parties agree, in writing, to a resolution. For more information, please contact the Title IX Coordinator.

## RESOURCES

If you would like confidential assistance or support, information about our resources can be found here: [www.gru.edu/titleix/support](http://www.gru.edu/titleix/support).

Please contact me as soon as possible if you have disability-related needs and wish to request reasonable accommodations to ensure your full participation in this process.

If you have any questions about this investigation, or University policies, or the content of this notice, please do not hesitate to contact me.

Respectfully,  
Cherie Shipper  
Title IX Coordinator

cc: Kevin Ware  
Abby Plates



GRAND RIVER  
SOLUTIONS

## Initial Interview of Complainant

**Investigator Plates:**

Good morning.

**Taylor:**

Good morning.

**Investigator Plates:**

All right, great. Thank you so much for meeting with me today, Taylor. In a few moments, I am going to ask you share with me whatever it is that you are able to share about your experience. While you are sharing I am going to just listen. I won't interrupt you, or jump in if there are moments of silence. I am going to just listen until you tell me you are done sharing. Is that ok?

**Taylor:**

Yes.

**Investigator Plates:**

Are you ready to begin?

**Taylor:**

Yes

**Investigator Plates:**

Taylor, what are you able to share with me about your experience?

**Taylor:**

Sure. So, you, do you, like, wanna know a little bit about me, too? Like how ...

**Investigator Plates:**

Wherever you're comfortable starting, if you wanna share a little bit about yourself, that's totally fine.

**Taylor:**

Okay. So, um, so I'm, uh, a second semester junior. And I live, um, off campus with, I have eight roommates. Um, they're all students. And, um, most of them are, um, guys.

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I have one roommate who's a girl, and then, um, the rest are guys. We all live together because most of us work at Cheers, which is, like, a bar that a lot of students go to. Do you, do you know Cheers?

**Investigator Plates:**

I'm familiar with it, yep.

**Taylor:**

Um, so I've worked there since, like, my freshman year, um, or my first year. And, um, met my roommates there. And you know, we get off work really late, right? And so, like, a lot of times, when the bar closes we'll, like, hang out for a little bit, and whatever. And we all decided to live together so that, like, we could get home safely at the end of the night. So, like, we all take turns, one of us is the driver, um, or two of us, depending on, like, what car we take. And then, um, also, like, it's just safer to go home late at night as, um, a woman in this town, like if I have other people with me. So we all just live together because it just makes it more convenient.

**Taylor:**

Um, and so, yeah, so I'm telling you this because this is kind of how I met, um, Drew, who was, like, the guy.

**Taylor:**

So, um, so yeah, so Drew is, um, in, uh, in a fraternity. Um, and, um, so is my roommate, Kelly's, um, boyfriend Paul. So Paul's in the fraternity, and, um, Paul dates Kelly, and Kelly's my roommate, and Kelly and I have been friends since, like, high school. And, um, obviously, Kelly hangs out at the bar a lot. She's like, on-our only roommate that doesn't work there. She just, um, well she should work there 'cause she's kind of there all the time. But anyway, she, she doesn't work there, but she comes in with Paul all the time. And I wanna say, like, during the spring of 2020-ish, um, yeah, it was the spring of 2020, um, Kelly told me that Paul's fraternity brother Drew, like, noticed me. And, um, like, when I was working at the bar.



**Taylor:**

And Drew asked Kelly to introduce us. And so a few days later, Kelly and Paul and Drew came into Cheers when I was working and, um, I, like, immediately recognized Drew, 'cause he definitely came into the bar all the time, like, with his fraternity brothers. And he was always, like, friendly, and maybe, like, awkwardly flirty with me. But a lot of people flirt with me because they, I think, want free drinks. But he seemed like he wasn't just into the drinks, like he would actually, like, you know, like spend time, even after I gave him a drink, like he'd spend time and hang out. So, like, I, I knew who he was, but I didn't, hadn't really, um, formally known him.

**Taylor:**

And then on this, the day in the spring of 2020, um, Paul and Kelly, like, officially introduced us. And I didn't really get to talk to him that much because I was working and it was really busy. Um, I remember. But the next day, Kelly and Paul were like, "Wat did you think of Drew?" And I told them that I thought he was okay but not really my type. And Kelly begged me to give him a chance, Kelly just kept saying that it would be so much fun if we were both dating guys from the same fraternity. So I guess I was like, "Okay, I'll get to know Drew better before, like, totally rejecting him." Um, so for the rest of the semester, which was, like, I think only a couple weeks, I remember, for some reason I remember the night I officially met Drew, I was wearing, um, like, shorts. Which I wouldn't normally do if it wasn't starting to get warm out.

**Taylor:**

Like even though the bar gets hot, I would wear pants. Because, like, leaving at night, it would be cold. So it must've been, like, a warm day. So, anyway, um, so, like, I think over the next couple of weeks, we hung out a couple times, but always, like, with other people like in large so- social settings. And maybe we hung out, I don't know, four or five times. Um, he was nice, wasn't, like, rude or anything. He was attentive. Um, and not at all disrespectful towards me. It was clear that he was into me. But he didn't, like, try to push it. I liked hanging ut with him, he was a good time, but nothing sexual ever happened between us. Honestly, I just wasn't attracted to him, so he became a friend, like somebody to party with but nothing more.



**Taylor:**

Um, I knew that he had a crush on me, so I was careful to make clear that I didn't feel the same way. Um ...

**Taylor:**

Um ... So, like, then the end of the term came, and I stayed, like, by campus to work. And I took a summer course, um, but I didn't, like, Paul, if he was around, I didn't see him. And I don't know if he went home or if he stayed, I don't know. But I definitely didn't see him, like, around, the entire summer. Um, I remember seeing him, like, soon after the fall semester came, like last semester. So that was fall of 2020. Um, and it was the first Friday night of the fall 2020 semester. Really, I remember that because it was a super busy night and everybody was back and, um, I remember he came in and I was happy to see him. Because like I said, because he was cool. Um, and so we spent a few minutes catching up, but not a lot of time, 'cause I was working.

**Taylor:**

And then, uh, over the next couple of weeks, like, I spent time with Drew and his friends, and Kelly and Paul, like pretty much every weekend. But again it was, like, at parties. Like it wasn't just the four of us, like there was lots of us. But he would be there and I would be there, and I started to hang out with that group a little bit more than I had before, um, because he was there, I didn't kind of feel like the third wheel anymore with Kelly and Paul. And, like, I liked hanging out with Kelly because she was my best friend. Um, and it helped to, like, have someone that I knew a little bit better, and so I hung out with them more.

**Taylor:**

Um, but, like, he didn't, I didn't feel like he still had a crush on me, which is why I felt comfortable actually spending more time with him. Like, I was under the impression that he had moved on, that he wasn't into me anymore. Like he wasn't as flirtatious. He stopped making comments that suggested that he had a crush on me. He even came into the bar a few times with another girl. And I was happy because I wanted us to be friends. And, um, I felt like that was easier once I didn't, like, think that he was interested in me in that way. Um, so yeah. Um, so I guess the next thing that happened that's, like, important to what happened to, like, here, is, um, a couple of days before, um, Halloween, and I know the exact date because I checked my work schedule.

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**Taylor:**

So it was October 25th, um, I was at cheers, and I was working an afternoon shift, which was weird. I don't usually do that, and that's how I remember, like I remember this was an afternoon conversation. And I remember, um, like, I just remembered that. So I looked back and the 25th was the only day I worked afternoon, like, anytime near Halloween, so it had to be that day. But I was working and Kelly and Paul were there. Um, and, um, they were having, like, lunch. And, um, and Drew came in, and he, like, was upset because the girl that he invited to go to his fraternity's formal had just canceled on him. Do you know what a formal is?

**Investigator Plates:**

If you could share with me a little bit about formals at your school, that would be great.

**Taylor:**

Yeah, so, like, um, the fraternities have, like, proms, basically. Like it's so dumb, but basically they all get dressed up, they, like, spend a bunch of money to go to essentially a place, like a reception, like where somebody would get married or something, and they have like, a party. Which I always thought was stupid, because why spend all that money to just come to Cheers or one of the 500 other bars? But anyway, they were having their formal, and he was supposed to go with some girl and she, like, like canceled on him last minute, and he was upset. Um, and he was talking to us about it, and while he was telling us, like, how she had just kind of blew him off, Kelly was like, "Oh my God, Paul, you should take Emily. I mean Taylor (laughs) to the formal." And, um, Drew got really excited and was like, "Yes, you should come with me."

**Taylor:**

And, um, yeah, so I asked a little bit about, like, the deal. And they told me that it was gonna be at a, at a resort about an hour away from campus, and that everybody was gonna spend the night there. Um, I didn't really wanna go, 'cause it would mean I'd have to take off of work on Halloween, which is, like, a big money making night. Um, but I was, like, had been picking up a lot of extra shifts anyway, and I realized I didn't really need the money. Um, and so I was like, "Okay, I'll go. But then I just want to understand, like, if we're staying overnight, like, how does that work?" Because I didn't wanna be alone in a room with, with Drew. Even though, like, I di- thought he wasn't

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into me anymore, like I just thought that would be uncomfortable. And so, um, Drew was like, "No, no, no, we're sharing a room with Kelly and Paul."

**Taylor:**

And so, um, I didn't think anything would get weird if we were all sharing a room, so I agreed. It sounded like fun. Um, like I said, he hadn't been trying to get with me for a few weeks. I thought it would be a good time with friends. Um, so yeah. And so, I agreed to go. Um ...

**Taylor:**

Um, so, I think it happen- like the next Saturday night was the formal. Um, it was at Greenfield. Which is like, I think, like I said, like an hour south maybe. I don't know. I'm pretty sure it's so- yeah, it was south of campus. Because we got on the highway going south. Um, so, it was supposed to start at seven, and there was going to be, like, a cocktail hour, a sit-down dinner, which I think is so dumb, and then dancing. Which, whatever. Um, and there was open bar. And it was, like, I think from 7:00 to 11:00 and then there was a cash bar after that. So people were told to bring cash, because this resort didn't take credit cards, which is also weird. Or, like, Venmo or anything. Um, so anyway, um, so yeah.

**Taylor:**

So this is, like, the day that everything happened. Do you have more questions for me about the day?

**Investigator Plates:**

Um, if you wanna go ahead and share more about the day, we can come back to those other questions, if that works for you.

**Taylor:**

Okay. So do you want me to talk about, like, the whole day? Or just the night?

**Investigator Plates:**

If you wanna talk about, um, the day as well, that would be helpful.

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**Taylor:**

Okay. Um, so, like, I worked until 4:00am the night before. And so, I woke up late. Like probably around, like, noon. And I went to the gym, and I always, on, um, Saturdays do, like, a 75 minute spin class. I'm pretty sure I did my spin class that day. Um, and then I always, after that, go to Wegman's and eat, and eat, usually a six inch turkey sub, which I'm pretty sure I did that day. Um, actually I'm positive I did that that day, now that I think about it. Um, 'cause I remember the next day being like, "All I ate was that sub." Um, so after I, like, ate, and went to the gym, I came home, and I remember I had to, like, pack quickly. Because, um, Paul and Drew were gonna pick me and Kelly up at our apartment at, like, 3:30. So I remember I didn't have a lot of time.

**Taylor:**

Um, I definitely, definitely didn't eat anything o- else, other than that turkey sub, like the entire day. Um, we got to the place at, like, 5:00. So it took us, like, an hour and a half. So I don't remember, but we must've stopped. I'm not sure, but if we did it was, like, maybe so somebody could go to the bathroom. But anyway, we got there around 5:00. Um, and we checked into the hotel, and it was a normal hotel room. Um, and so, um, there was, like, a bathroom and two beds. And, um, yeah. So we, yeah. So there was a bathroom and two beds. Um, I'm just gonna check. It was ... th- um, so after we got there, um, I think Paul and Drew, like, got dressed pretty quickly. They put on their suits and they went to the hotel bar. And then me and Kelly, um, took turns showering, and we got ready.

**Taylor:**

And then, um, we were pregaming while we were getting ready. And then, when we were done getting ready, we went down to the hotel bar, and met Drew and Paul. Um, I think I- we just pretty much sat there with the three of us and a few other people I don't really know for about an hour, and then cocktail hour started. Um, I th- then, I had a couple drinks. Um, when we were at the bar. Actually, I think I just had one glass of white wine and I definitely had a club soda because I usually do that. Like I alternate drinks and soda, drinks and soda. Just 'cause I don't like to get hungover. Um, and that helps. So I th- I ordered, I definitely ordered the wine myself, I definitely ordered the club soda myself. Like being a bartender, I know how important it is to, like, watch people pour your drinks and to order yourself, and so I did that.

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**Taylor:**

Um, and yeah, I remember I was just sitting at the bar, and I think, or I don't think, but Drew was on ... Or excuse me, Paul was on one side of me and Kelly was on the other side. Actually no, Drew was on one side, and then it was me, and then Kelly, and then Paul. Um, and I remember because Drew and Paul kept leaning across us and talking and it was annoying me. Um, because they were loud, like they were already drunk and it was, like, early. So it was annoying. Um, so then we all went into, like, the cocktail hour at 7:15. There was food but I didn't really eat anything, um, 'cause it didn't look gross. There was, I would say, 60 people. And, um, I recognized most of them, because a lot of them come into Cheers. But I wasn't particularly close with any of them.

**Taylor:**

This wasn't my normal crowd of friends. I knew Drew and Kelly and Paul, of course, but the rest of the people at the party were more the fraternity and sorority scene. Which I'd never really been a big part of. So, um, so yeah. So once we got to cocktail hour, um, I remember Drew offered to get me a drink and I was like, "Sure." And he came back with a cranberry and vodka in a pint glass. And I drank, or started to drink it. It was pretty strong, and so I kind of took it slow. It was, like, a really strong drink. Um, and I make stiff drinks, and this drink was strong. Like, so it was definitely, like, crazy. Um, so yeah, I think I just had that one drink at the cocktail hour.

**Taylor:**

And then, um, we went into the, like, the big room. Like I think it's called a banquet room. And we had assigned seats. We went and sat, I was at a table with, um, me, Drew, Kelly, Paul, um, uh, this girl Cristina, and, um, this guy Matt. And so, um, we all sat and shortly after we sat down, uh, Drew asked if I needed another drink. And I, um, was still drinking the cranberry and vodka that he got me during cocktail hour. And so I told him that I was good. And, um, he left. And he went to the bar to get another drink. Um, so yeah. I was, like, just talking with everybody at the table, and then 20 minutes later, he came back. And by, like, by he, I mean Drew, he came back to the table, and he put another, um, full cranberry and vodka in front of me, and was like, "Oh, I got you a backup."

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**Taylor:**

And I remember in the moment being annoyed by it, because I was like, "Dude, I told you I don't need a drink, I'm a grown ass woman, I can get my own drink if I need one." And then I kind of felt like I was being a bitch in my head because he was just being nice. But, like, I had two full drinks at that point, and they were really strong, and I was, I don't know, I remember being annoyed by it. Like at this point in the night I was just kind of annoyed by him. Like, he was drinking, he was talking across me. He wasn't listening to, like, me say, "Like, no I don't want a drink." And that's not what I like. And so, anyway, I was just kind of annoyed. Um, but, um, I remember, like I, I kept drinking what I had.

**Taylor:**

And then that was pretty much my last complete and clear memory from the night. Like, him coming back to the table and being like, "Here's another drink." And me getting annoyed, and that, that's pretty much it. That's my last complete and clear memory. Um, the rest of, so, like, the rest, when I try to think about the rest of the night, like the rest of my memories are, like, short movie clips, that's the best way I can describe it. I, I remember bits and pieces of the night. And the memories that I have are crystal clear, but they're short little snippets, and I'm not sure of the order, like, in which things happened. Um, should I share, like, what I do remember?

**Investigator Plates:**

Yes, that'd be helpful.

**Taylor:**

Okay. So I don't know if this is in the right order, but this is the order that I, like, remember it in. But I don't know if this is how it actually happened. But the first memory I have is of walking down a long hallway with a lot of doors. Um, I remember that I was leaning against the wall for support as I was walking, and I think I was barefoot. I don't remember seeing or talking to anyone, everything was, like, spinning. And I just, like, felt like I was in a movie. Like, ha- like have you ever seen, like, a movie with, like, a long hallway? That's what it felt like. And I just, like, just remember being like, slumped up against the wall and, like, walking down, like almost like I was, like, sideways. But obviously I wasn't sideways, but that's how I remember it.

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**Taylor:**

Um, I also remember being in a bathroom with stalls. Um, there was a pink loveseat in the bathroom, too, I remember this bright pink loveseat, and I remember being on the floor of one of the stalls when two girls came into the stall, and I remember that they picked me up and put me on that pink couch. They were really nice to me, they gave me water, and then I remember, like I had, like, a, like a, like a glimpse of Kelly coming in. I think someone had went and got her. I remember Kelly saying, "I don't understand how she got this way." And then things kinda go blank again.

**Taylor:**

Um, I remember waking up in a bed, the room was dark, and I was on my back. My dress was still on, and it was up, and my arms were, like, tangled in it. I immediately kind of felt, like, a weight on top of me, and I realized it was, um, Drew. He had his mouth on my neck, and then on my breasts, and I remember having a sharp pain in my vagina. I realized his penis was inside of me, and he was, you know, having sex with me. I tried to lift my hands, but I just couldn't. And I remember I tried to speak, but I couldn't find any words. And there was no more. And then there's no more, it's just black, and I must've passed out again. Um, I definitely woke up again, and, um, I was face down in the bed. My dress was pushed up so my face was a- like on the bottom part of my dress. And someone was penetrating me vaginally, like with their penis from behind.

**Taylor:**

Um, I tried to push myself up, but as soon as I lifted my head, I started to, to vomit, um, I started to get sick. And I recalled that whoever had been on top of me kind of, like, withdrew from my body. And yelled, "Oh fuck." Um, I definitely recognized that voice to be Drew's. And I remember being dragged by my arms, like this person got off the bed and came, like, in front of me, and dragged me by my arms so that my head was hanging off the side of the bed, and I just remember that I just kept puking. And that's the only memories I have of the night. Um, my next clear memory was when I woke up in the morning. I remember waking up and being totally disoriented, I was under the covers, and I had clothing on. Although I wasn't sure in the moment what I was wearing. Um, Drew was in the bed next to me, he was asleep on top of the covers, and was dressed in shorts and a shirt, which I thought was weird.

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**Taylor:**

I remember looking over at the other bed, it was empty, um, and I felt, like, kind of panicked. So as soon as I sat up, I felt sick, and I had to run to the bathroom to throw up. Um, after I puked, I washed my face and looked at myself in the mirror. I remember, like, I just stared at myself for, like, 10 minutes. I was still in my dress, but I had a black fitted tshirt over it, which doesn't make any sense. Um, the bottom part of my dress, which was, like, a full length dress, and my hair were wet. Like wet, like wet wet. Like almost, like, someone had, like, washed, like, puke off of me. Um, and so I just sat on the floor of the bathroom and I tried to figure out what happened to me. I, I couldn't remember a thing, my head was pounding, my stomach was sick. I had a pain in my vaginal area.

**Taylor:**

Even though I couldn't remember what happened in the moment, I knew, I just knew that Drew had sex with me. So I stayed in that bathroom, like on that floor, for what felt like forever. I was numb. I didn't know what to do. I was still made at myself for getting so drunk. I was frustrated that I couldn't remember anything. I was so embarrassed. In that moment I felt helpless and ashamed and just, it was, like, the worst feeling in the world. Um, at some point while I was in there, I don't know how long I was in there, Drew started knocking on the bathroom door and asked if I was okay and if I needed anything. And I didn't know what to do. But I knew I couldn't hide in the bathroom forever. So I pulled myself together and I opened the door.

**Taylor:**

Um, Drew told me to lay back down and he would go get me something to eat and drink. And I got back into the bed, and left the room. Um, I don't remember if I did or I didn't text Kelly. Um, I looked back at my phone to see if there were text messages between us, and, um, it didn't go back that far. But, like, for some reason I think I did. But I don't know. But anyway, Kelly and Paul came back in a few minutes after he left, and they asked if I was okay. Um, and I basically told them I was not okay, and that I wanted to go home. And so they just started to, like, immediately pack up. Like they didn't ask me any questions, they just started to pack.

**Taylor:**

And then, um, at some point, Drew came back with food and water, um, and at that point, we were ready to go. And so Paul told Drew that he should find another ride home. But Drew insisted on going with us. Um, he got ready super fast, and within 10 minutes we were in the car and on our way home. Um, I didn't, like, talk at all during the way home. I blamed my silence on being hungover. Um, the three of them were laughing at me. Drew told me I won the award for the most wasted date. I actually felt bad, like I had embarrassed him or something. As we drove, memories of the night started to come back. When I remembered parts where he was having sex with me, I got physically sick. I had to make Paul pull over and I was violently vomiting on the side of the road.

**Taylor:**

Um, when we finally got home, Paul dropped me off at the apartment. And I got out of the car and I remember I didn't, like, say anything. I just got out of the car. And I went straight into the apartment. Um, when I got in, um, my two roommates, uh, Brett and Joe, were sitting at the kitchen table. And, um, Brett and Joe looked at me and I just started to cry. They rushed over and asked me what happened. I could tell that they knew it was something bad. I could almost feel the anger radiating off of them. And it scared me. I was afraid that if I told them what Drew had done to me they would kill him. I, I had been friends with them since freshman year, they were really protective of me, like big brothers.

**Taylor:**

So I made something up. I'm not even sure what I said, and I don't think they really bought it, but they left me alone. And I went straight to my room and I slept for, I feel like, five days. Um, so yeah. That's really it.

**Investigator Plates:**

Okay. Taylor, thank you for sharing that with me. Um, are you comfortable if I ask you a few questions? (silence) Okay, all right. So I'm gonna, um, back up a little bit, if that's okay. Um, and ... Do you, you had said previously that you knew that, um, Drew had a crush on you. And you shared that you made it clear that you didn't feel the same way. Can you help me understand, um, how you made that clear to Drew?

**Taylor:**

Yeah. So, like, I knew he liked me, and I didn't wanna lead him on. So I never accepted his invitations to hang out alone, I never let him buy me drinks. Um, I even showed up to parties at his house with other guys that I was seeing at the time. Um, I never, like, explicitly told him that I wasn't interested in being more than friends. But I really think my actions made that clear to him. Um, and I think he understood that I wasn't interested hi- in him in that way.

**Investigator Plates:**

Tell me more about "in that way?"

**Taylor:**

Like sexually. Like he knew that I didn't wanna hookup with him or date him.

**Investigator Plates:**

Help me understand your belief that Drew knew that you didn't want to hook up with him or date him

**Taylor:**

Um, like I said, like, he ... I mean, I couldn't have made it any clearer. Like he would flirt with me, and I just didn't engage with him in that way. Um, and, like, he never explicitly told me he liked me either. Like, he never, like, asked me out on a date, or he never asked me to hookup, which would've been really direct. But, like, he definitely was flirtatious and I wouldn't really flirt back, and he did ask me to hang out, like, just the two of us. Like I remember one night, he was like, "Do you want to come over and watch a movie?" And I was like, "Oh, who else is gonna be there?" And he was like, "Oh, it'll just be us." And I was like, "No, like I'd rather hang out in a big group." And things like that. And he just kinda stopped asking, which wo- made me feel like he knew that, like, he knew to stop asking. Because I wasn't gonna, like, hang out with him alone. So that's kind of how I knew.

**Investigator Plates:**

Help me understand your contact with Drew over the summer.



**Taylor:**

Nothing. I didn't hear or see or engage with him at all over the summer.

**Investigator Plates:**

What are you able to tell me about your interactions with Drew once the fall 2020 started

**Taylor:**

I don't even really remember them. They weren't that, like, significant. Like it was just a bunch of people hanging out. And like I said, like I knew him better than I knew some of his other fraternity brothers. Um, and when I would go to the, the, like, parties with him, like it wouldn't ... Like the fraternities host parties, but not just for fraternity people. So, like, when I said I would go there and hang out, like, with him and his friends a little bit more, I guess what I meant would be, like, my friends, my group of friends would choose to go to the parties that his fraternity was hosting more, because Kelly was there and Paul was there, but also Drew. And, like, Drew was now kinda my friend. So that's what I meant.

**Taylor:**

But you know, we would hang out. Like I'd be there with friends, he'd be there with friends. Like I said, there was a girl that he was seeing who would be around. Um, and so, um, yeah. So that was kind of it.

**Investigator Plates:**

You mentioned that when Drew asked you to go to the formal with him, um, and you were kind of questioning the sleeping situation because you'd be sharing a hotel room, um, help me understand that, not wanting things to get weird?

**Taylor:**

Yeah. I meant I didn't think there would be any opportunity to hook up. Um, and so Drew wouldn't try. Which meant I wouldn't have to make things weird by rejecting him. Like the fact that we were all staying in the same room, I was like, "Oh, like, he's not gonna try and hook up with me in front of Kelly and Paul." And so, like, I'm not gonna have to deny him, and then make things weird. That's what I meant.

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**Investigator Plates:**

Okay. Had Drew ever tried to hookup with you before?

**Taylor:**

No.

**Investigator Plates:**

Okay. All right.

**Taylor:**

Although I had, like, kind of got the impression from what Kelly and Paul told me, and from the way he acted, that he totally would have if I was into it.

**Investigator Plates:**

Okay. So when you got to the formal, um ... You had mentioned that, um, you checked in and it seemed like, I think you said normal hotel room with two beds. Um, were any of the sleeping arrangements discussed prior to going to the hotel?

**Taylor:**

We didn't talk about it. Um, and then once we got there, we didn't talk about. Like Kelly and Paul put their bags on one bed, Paul and, or Drew and I put our bags on another. It was kind of understood that they would be sharing a bed, and that Drew and I would share a bed. I wasn't opposed to sleeping in a bed with him. Like when you're in college, you know, living with lots of roommates, it's common for people to sleep in beds with each other, especially after a long night of partying with never for a second thought that agreeing to share a bed with him was a signal that I wanted to have sex with him.

**Investigator Plates:**

You'd mentioned that you and Kelly were pregaming, help me understand pregaming.

**Taylor:**

Um, so, like, what do you mean? Do you wanna know what we were, like, drinking?

**Investigator Plates:**

Yeah. So I just wanna make sure I understand what you mean when you use the term pregaming because it is important to me that I have a full and clear understanding of your experience.

**Taylor:**

Yeah, so, sure. So it's basically, like, while we were getting dressed, we had some drinks. Um, I remember that we were definitely drinking champagne, 'cause, um, I had taken a bottle from the bar and brought it with us. Um, and I remember I had, like, two small glasses. They were about, like, four ounces. So I probably had, like, eight ounces of champagne. We definitely didn't, like, kick the bottle.

**Investigator Plates:**

Okay.

**Taylor:**

But we almost did. Um, and that, so we had while we were getting ready, and then we went down for cock- or down to the bar before cocktail hour.

**Investigator Plates:**

Okay. And help me understand how you were feeling while you were pregaming?

**Taylor:**

I felt fine.

**Investigator Plates:**

Are you able to recall if you ate while you were pregaming?

**Taylor:**

No, I didn't eat anything. The sub was the only thing I ate that day.

**Investigator Plates:**

Okay. All right. Um, so down at cocktail hour, uh, you had a couple drinks. Are you able to share with me what you were drinking?

**Taylor:**

It was white wine, and I think I only had ... No, well, in the hotel bar I had a glass of white wine and a club soda. And then, at cocktail hour, I was nursing that cranberry and vodka that he got me, that double. And then the, by, that's what I drank. I had the champagne, the wine, and almost all of the first cranberry and vodka. I don't remember touching the second one, but maybe I did. I don't know.

**Taylor:**

I don't know. I don't remember.

**Investigator Plates:**

Okay. And are you able to recall how you were feeling, um, when you were drinking that first vodka?

**Taylor:**

I mean it was strong, so I started to get a buzz real quick.

**Taylor:**

And then it was just, like, lights out everywhere.

**Investigator Plates:**

Help me understand lights out everywhere

**Taylor:**

I don't remember a fucking thing shortly after I started drinking that drink

**Investigator Plates:**

Okay. Um, you had said that, um, you recalled that Drew was already drunk. So help me understand what led you to believe that he was drunk.

**Taylor:**

Well he was drinking fast. He was drinking beer up until that point, and I remember he was drinking fast. I wasn't counting, but I would say that by the time we got to the banquet room for dinner, he had at least four bottles of some IPA, which are, like,

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strong beers. And yeah. Like I just remember him drinking fast and b- he just was acting like somebody who had been drinking. So I saw him drink before, um, but I don't know how much he had before we came, like while we were getting ready. Like I don't know how much he had when he went to the bar. Like, he could've taken shots. Like I have no idea. Um, but I saw him drink at least four beers in a short period of time, from the time we got downstairs, until the time, like, I don't remember anything. Which was, like, less than two hours.

**Investigator Plates:**

Okay. And are there any conversations from, um, the time that you went down to the bar, until you aren't able to recall, um, are there any conversations during that period of time that stood out to you?

**Taylor:**

No. It was just like, small talk with a bunch of people I don't know.

**Investigator Plates:**

Okay. Okay. Um, so tell me ...

**Taylor:**

I mean, after the whole incident, I was really angry. Um, like, I was angry because I should've never gone. Like I didn't even like these people, I don't know why I went. I was just angry that I, at myself for going. And I, I was angry at Paul. I was con- or not Paul, at Drew. I was convinced that he drugged me. I mean, I was a bartender, Investigator Plates, I drank a lot. My tolerance for alcohol was high. There was no way I had gotten that wasted, would've gotten that wasted, off of three, maybe four drinks. Um, and so after this whole thing, like, I avoided Drew and it seemed like he was avoiding me, too. I didn't go to parties at his house. He stopped coming to the bar. If I saw him out, I would leave immediately.

**Taylor:**

I managed to go the whole rest of the semester without seeing him. Not seeing him, it helped. It allowed me to forget, or at least convince myself that it didn't happen.



**Investigator Plates:**

Okay. Um, are you okay if I, I back up a little bit, ask some questions?

**Taylor:**

Yeah.

**Investigator Plates:**

Okay. Taylor, you described some of your memories from that evening. Um, are there any other things that you recall?

**Taylor:**

No, I've, like, thought about it and thought about it and thought about it, and that's all I have.

**Investigator Plates:**

Okay. Okay. So help me understand, um, why you decided not to report at the time.

**Taylor:**

So, um, I don't think I even realized that what he did was wrong, and that he had raped me, at first. Um, I mean, that morning I knew that what he had done was wrong, I knew that in my bones. And deep down, I believed that I had been drugged. But I had no proof that it was him. He was my friend. And so part of me wanted to give him the benefit of the doubt. I mean, I couldn't remember what had happened. I'd wondered if maybe I asked for it, led him on, I don't know. But the further away I got from the night, the more I realized that I was out of it. Everyone I spoke to that night said that I was a complete mess. Falling all over the place, incoherent, vomiting, passed out on the bathroom floor. And he knew that.

**Taylor:**

A few weeks after the formal, Kelly told me that Drew had literally carried me from the li- bathroom, back to the hotel room, over his shoulder like a sack of potatoes. It was, at that point, or maybe sometime after, that I realized that he didn't deserve the benefit of the doubt, and that he had raped me. But then it seemed like it was too late. And who would believe me now? So I, I just didn't say anything. And just, like, tried to

live with it, and, like, move on from it. And like I said, I just avoided seeing him and, um, yeah, I mean, I was pretty successful. Of, uh, successful at avoiding him for months.

**Investigator Plates:**

Okay. And help me understand what led you to report it now.

**Taylor:**

Yeah. So like I said, I had successfully, successfully avoided Drew for months. But about a week ago, I was at Rusty's, which is, like, another bar. It's, like, right across from Cheers. And, um, well I was there with just a couple of friends. Um, and, um, they had, like, gone off. So I was kind of alone. But I didn't feel alone. Because, like, I was talking to the bartender. All the bartenders, we know each other. And so I was talking to the bartender, and then, um, he got busy and, like, went off to serve folks. So I was kind of just standing alone at the bar. I think I was on my phone or something. And all of a sudden, Drew came up to me and was like, "W-" Asked me why I'd been avoiding him since October. And I said, "You know why." And I tried to walk past him. Um, but he stepped in front of me and I wasn't able to walk away, and he said, "Why don't you enlighten me?" And he was smirking.

**Taylor:**

He knew exactly what I meant. It seemed like he wanted to make me say it, and I refused. I called him a sick fuck, and I pushed past him. He started to follow me and I started to run like a crazy person through the bar to get away from him. I was crying. And when I got to the door I looked back, he wasn't, he wasn't following me anymore, but he was standing there watching me, and he was laughing. Um, it was in that exact moment that I was like, "I'm gonna report this asshole." Um, and, and I did.

**Investigator Plates:**

Okay. Um, Taylor, is there anything else that you think is important for me to know?

**Taylor:**

I don't think so, not right now.

**Investigator Plates:**

All right. Um, if you think of anything else, feel free to reach out to me. Um, do you have any questions for me?

**Taylor:**

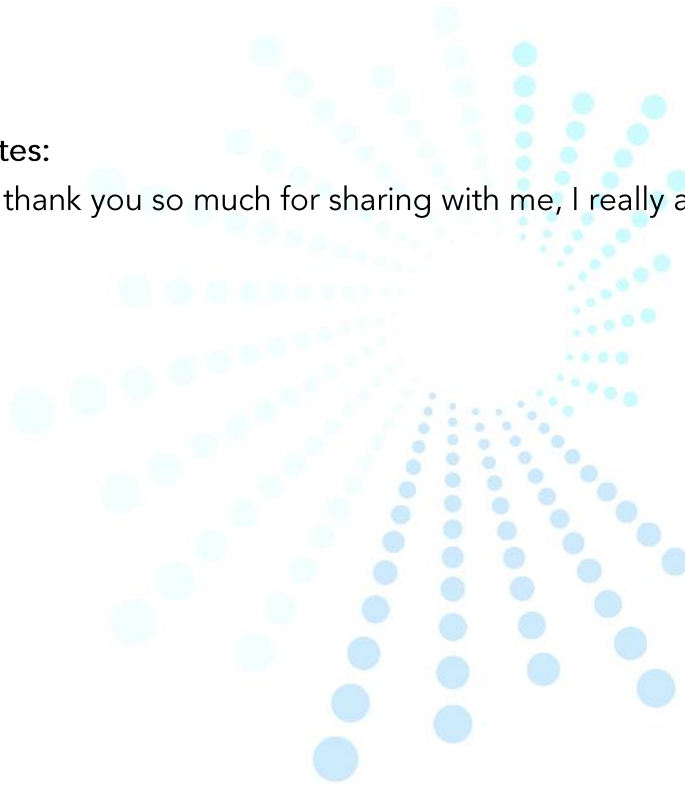
I don't.

**Investigator Plates:**

All right, Taylor, thank you so much for sharing with me, I really appreciate it.

**Taylor:**

Thank you.



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### Follow Up Interview

#### **Investigator Plates:**

Good afternoon. Thank you for taking my call. I have just a few questions.

#### **Taylor:**

Sure. I have a few minutes now. If we need more time, I can speak again tomorrow.

#### **Investigator Plates:**

Great thank you. This shouldn't take very long. In our follow up interview with Drew, we asked him about his assertion that you had texted him during the early morning hours of November 1, 2020 and asked him to come back to the room. Drew shared that this exchange wasn't actually by text, but instead was through snap chat. We wanted to give you an opportunity to respond.

#### **Taylor:**

Yea. No. I don't use social media. I don't even have a snap chat and wouldn't know how to use it. Ask anyone who knows me. That is a blatant lie.

#### **Investigator Ware:**

Thank you. There is some evidence that indicates that when you returned to the party during the early morning hours, you were socializing and drinking. What are you able to tell us about that?

#### **Taylor:**

Nothing. I don't have any recollection of that, other than what I already shared. And actually I am out of time. Was there anything more?

**Investigator Ware:**

Not right now, but if there is, do I have your permission to reach back out.

**Taylor:**

Sure. Thank you and have a good one.



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### Follow Up Interview of Respondent

**Investigator Ware:**

Good afternoon. Thank you for agreeing to meet speak with me again. I have some questions in follow up to our last conversation. Before we get started, do you have any questions for me or is there anything that I can do to make you feel more comfortable today?

**Drew:**

Um, no, I don't have any questions. You answered them all when we spoke by phone when scheduling this meeting.

**Investigator Ware:**

Is it ok to get started?

**Drew:**

Yes.

**Investigator Ware:**

Id like to start with discussing a text message exchange that between you and Taylor that you mentioned when we first spoke. Specificially, you indicate that Taylor sent you several text messages during the early morning hours of November 1, 2020 asking you to come back to the hotel room. Do you recall sharing that with me?

**Drew:**

I do, yes.

**Investigator Ware:**

Now you submitted screen shots of text messages between you and Taylor, but it doesn't appear that that exchange is included in what you previously submitted to me. Help me understand.

**Drew:**

So yea. I made a mistake. Those were not texts that Taylor sent that night. They were messages on snapchat so I don't have them anymore. They like disappear.

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**Investigator Ware:**

Thank you. You were provided a copy of Taylors written response to the evidence. In her response she asserts that she did not send you those messages. Would you like to offer a response?

**Drew:**

I honestly don't know why she would deny it, or why she is lying. I hate to say it, but clearly she is a liar. She is lying about me doing this and she is lying about the text messages. If this whole thing didn't have the a chance of ruining my life I would feel bad for her, because clearly there is something wrong with her. I don't mean that in a degrading way, I just cant think of any other explanation for why she would make this whole thing up. In fact, I don't even know what the point is of talking about this anymore.

**Investigator Ware:**

I do have additional follow up questions for you. Would you like to continue?

**Drew:**

Actually, no. I've said everything I am going to say.



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## Interview of Respondent

### **Investigator Ware:**

Good afternoon, my name is Investigator Kevin Ware. I am, uh, here to, um, give you an opportunity to share your perspective with regard to the allegations in the formal complaint that were previously shared with you during your meeting with the Title IX Coordinator several weeks ago.

I see that you have an advisor present with you. Uh, are you ready to proceed today? And before doing so, could you please just state your name for the record?

### **Drew:**

I guess my name is Drew and, um, I, um, I am ready to proceed. I have my advisor and I'm ready to, to share.

### **Investigator Ware:**

Wonderful. Well, um, I'm gonna go ahead and ask you one, a few moments to share whatever it is that you'd like to share with me, but before we get started, do you have any questions for me or is there anything that I can do to make you feel more comfortable today?

### **Drew:**

Um, no, I don't have any questions. The Title IX Coordinator answered most of them and, and I don't, and I, I'm pretty comfortable here today.

### **Investigator Ware:**

Well, that's good to hear. If there's anything I can do during our time together today to make you feel more comfortable, or if you have any questions, please just let me know. In a few moments, I'm gonna just start by saying something along the lines of, uh, help me understand your perspective. And from that point on, we can get, you can go ahead and share. Uh, while you're sharing, I'm gonna to be quiet and I'm gonna be actively listening to you because what you have to say to me is important.

**Investigator Ware:**

I'm not gonna interrupt you or step in with my own questions until you'll let me know you're done sharing. Does that sound okay?

**Drew:**

Yes, that actually sounds fine.

**Investigator Ware:**

Okay. Well then why don't you go ahead and share what you'd like to share?

**Drew:**

Um, okay. So, um, like I said, my name is Drew and, um, I, um, and a second semester junior. I am, um, in a fraternity, I think you're familiar with my fraternity. And currently, um, I live off campus in the frat house, um, where I live with 15 of my fraternity brothers. Um, I have known of Taylor since the start of my sophomore year. Um, I used to go like my, my friends and I are my brothers, and I would spend a lot of time at Cheers and Taylor's a bartender there. But I didn't officially meet Taylor for the first time until the... Hmm, let me think.

**Drew:**

I officially met Taylor for the first time towards the end of the fall 2019 semester after having been introduced by my fraternity brother, Paul. Um, after Taylor and I were officially introduced, we hung out a few times. I don't think we ever really hung out alone. I can't really remember what we did or who was around, but I remember seeing her out more and making an effort to talk to her more. Um, and the more I like chilled with her and hu- hung out with her and like spoke with her, the more I liked her. I was interested in her, you know, I wanted a date or maybe, she's a pretty girl and she was fun to hang out with. I thought she was interested in me too. She definitely flirted with me.

**Drew:**

Um, but that was the, uh, spring of 2020, and I didn't ask her out that semester or make a move, um, because we only started to get to know each other towards the end of that semester, and the school was almost over for the year and I was going home for break. There was no point in starting something right before I was gonna leave, so I didn't make a move. When we got back for the fall of 2020, um, I was eager to see, um, Taylor again. So I think it is the first weekend when I was back to school, I'm pretty sure I absolutely went to the bar that first Friday night to invite her to our party the next night. I wanted to see her, I was hoping we could pick up where we left off.

**Drew:**

Um, and so, uh, she definitely showed up. So yeah, so I went to the bar that Friday night, asked her to come to our party, it's like one of our biggest parties that our fraternity throws. Um, it's the first Saturday of like when school's back. And so I, like I said, I went to the bar, asked her if she'd come the next night. She said, yes. And, um, so I was super excited Saturday 'cause I was like, this is my chance. You know, I thought she was into me. I was definitely into her. Um, she looked just as good, you know, before or after summer break, maybe even better, 'cause she was kind of tan if you know what I mean.

**Drew:**

Um, and, and yeah, I was looking forward to seeing her. So that Saturday night, um, you know, we were hosting the parties, I was pretty busy in the beginning of the night, but I definitely had my eye out for her throughout the night as people were coming in and out, the party was pretty crowded. I would say there was a couple of hundred people there. Um, but I was looking out for Taylor and then, um, I saw her and, um, I was like making it my way across the room, and then all of a sudden she was with, I noticed she was with one of our roommates who I recognize from Cheers too, this dude, Joe. And, um, as I was making my way to the room, to go, you know, say hi to Taylor, Joe came up behind her and they kind of like started to walk off.

**Drew:**

So I followed them, and then they wound being like in a dark corner and they were hooking up, which was pretty scandalous, 'cause as far as I know, Joe has girlfriend and



Taylor and Joe are roommates. And so the fact that they were like in a dark corner making out, just kind of, didn't kind of rub me the wrong way. And so from that point on, I just kind of didn't wanna, wasn't interested anymore. Uh, she was obviously doing her own thing and uh, I don't like girls who hook up with other girls boyfriends. And so I was kind of like, all right, not interested anymore.

**Drew:**

Um, so yeah, so that kinda like ended my interest in her, but not necessarily our friendship, but like I no longer like, was interested in dating her. Um, and I actually started seeing someone else, myself and other students, um, this girl, uh, Lauren and, um, so Lauren and I started dating and, um, we dated throughout the term for most of the semester or at least for most of the first month of the semester. Um, right up until like the week before my formal, which is like where it gets important again. So, um, yeah, so Lauren and I were dating, um, I didn't really kinda mess with Taylor during that time. If I saw it at the bar, I'd say hi, whatever, or sometimes she'd be out like at parties and we would chill, but it was nothing like whatever, act like we were friendly.

**Drew:**

Um, and then a week before the formal, which was gonna be on October 31st, um, Lauren and I ended it and, um, well actually she broke up with me, and so, yeah, I didn't have a date. Um, I remember I went into Cheers and, to meet up with Kelly and Paul, and Taylor was working. And I think Kelly recommended that maybe I take Taylor to the formal and she seemed okay with it. She seemed actually excited and like into wanting to go, 'cause she'd been around more, like around my scene a bit more, which was a new thing. And um, so, uh, yeah, I was like, that's a great idea. And we made plans for me, for her to be my date to the formal.

**Drew:**

Um, so the formal was on a Saturday, it was October 31st, it's Halloween, but none of us were dressing up, like we're not into like Halloween parties in my fraternity. Um, and, uh, so, uh, we, part of the reason we have the formal on Halloween, so we could like get out of that thing 'cause it's pretty juvenile. Um, and whatever. So I remember Paul and I picked Kelly and Taylor up at their apartment sometime in the afternoon, I don't remember when it was. We got to the place where the formal was and we

checked into our rooms 'cause we were all staying over and Kelly and Paul, Taylor and I were sharing a room. Um, and when we walked into the room, Taylor just like put her stuff down on the bed and that was pretty surprising to me.

**Drew:**

Um, and yeah, so, um, she put her stuff down on the bed and she looked at me and was like, I'm looking forward to a good snuggle, which I thought was interesting. Anyway, we've spent just like about 15 minutes in the room, and then, um, Paul and I left to go to the hotel bar while the girls got ready. Um, about an hour before cocktail hour, which I think started at 7:00, Taylor came down and joined us at the bar. I think Kelly was with her, I'm pretty sure she was though, but I don't really remember. This is a long time ago. Um, Taylor was fine when she came down, she was fine during the cocktail hour. And then like 20 minutes after we sat down for dinner, she started to act wasted. It was crazy, and it came out of nowhere.

**Drew:**

I mean, it was only 8:30 and she was ready to be put to bed. I just figured that she hadn't eaten or something, I gave her some bread and she ate it. I got her water too. Um, and after I fed her, this other girl who was at our table, um, took Taylor to the bathroom because she was in no condition to make it there on her own. Um, yeah, I think it was, I think it was Christina who took her to the bathroom. Yeah, it was Christina. (silence)

**Drew:**

So about 20 minutes after Christina took Taylor to the bathroom, Kelly came over to me and um, asked if I could help get Taylor back to the h- hotel room. I followed Taylor to the girl's room, I actually went in, I'm sorry, I followed Kelly to the girl's room, actually went in and Taylor was asleep in a chair. She had puke on her dress, I remember that. I picked her up over my shoulder and carried her out of her room, she was awake, but out of it, Kelly was with me the whole time. We put her in bed, the second I put her down, she started to vomit and I panicked. I turned her on her side

and she kept puking up the side of the bed. I held her hair back the best I could, when she was done, Kelly cleaned her with a wet towel.

**Drew:**

I got her water and she drank some. Then we turned her on her side, put a garbage film next to her, and I left. Kelly stayed with her, I don't know for how long, it was probably between 9:00 and 9:30 when this happened. I went back to the party and then, um, we were downstairs in, like, the reception area and that, and around 1:00 AM, me and a bunch of people went outside for a bonfire. Um, I came back inside around 3:00, her and me had hung out at the bar for a little bit longer, and then a little bit after I came inside and was at the bar, um, Christina told me that Taylor had come down to the bar area around 2:30 AM and had stayed for about an hour.

**Drew:**

Um, Christina said that Taylor seemed better when she was down there. Um, so at around 3:30, so I guess I got inside around 3:00, but then around 3:30, um, I got a bunch of text messages from Taylor, asked me to come back to the room. Um, so I went back and when I got up there, Taylor was fine and was awake. Um, she seemed fine. And so I got out of my suit and got in bed because I wasn't gonna sleep on the little couch, I'm a big guy. I'm 6'2", like 225 pounds. Um, so I wasn't gonna sleep on the little couch, which would have been fine for Taylor. Um, so I got in bed and we started to talk.

**Drew:**

Um, I asked her if she felt better and she told me, yes. She apologized, and I told her not to worry about it. At that point, I was pretty drunk myself and I just wanted to go to sleep. At some point, she put her arm around me and settled into me, I rolled onto my side, and we were face-to-face, she didn't back away. So I kissed her, she kissed me back. I got on top of her and she continued to kiss me back. I asked her again, if she was okay and she moaned. We started to undress each other, before I knew it, we were having sex. She was totally awake and totally into it.

**Drew:**

Um, so I guess we had sex for like, I don't know, I don't know, it was awhile. And like I said, she was into it. And then when, when I finished, I basically just laid down and she laid down and we both, I know I fell right asleep. 'Cause like I said, I had been pretty drunk. And so, that, the activity mix of the alcohol, afterward, I fell right, I fell right out. Um, so the next morning when we woke up, um, I woke up and she wasn't in the bed. Um, I think she was in the bathroom or something. And I don't remember if I went and knocked on the door. She came out, but I just remember she was acting weird the next morning. I just thought it was because she was embarrassed about how she had acted the night before.

**Drew:**

Um, and so I didn't really push her 'cause I felt bad, 'cause I'd have been embarrassed if I was her too. I mean, she was the drunkest person at the party. Like it was, she was a mess and everybody was talking about it. So I kinda just felt bad for her and just kinda didn't push her and kinda just let her be quiet and whatever. So we left pretty soon after we woke up 'cause she wanted to go home. Um, I didn't see her like at all. Well, that's not true. I didn't see her often after that day and night, um, I stopped kinda going into Cheers. She never, never saw her at any of our parties. Um, she was clearly avoiding me and honestly I was okay with that.

**Drew:**

I started dating someone else shortly after that and so I didn't seek her out either. Um, so yeah, that's kinda what happened. Do you have any questions? You can go ahead and ask.

**Investigator Ware:**

Well, thank you. I do have some follow-up questions for you and I'm gonna try to go in the order that's uh, you shared in. I'll try not to jump around on you. I'll do my best. Okay. Thank you. Let me just have a second here. You mentioned that during the spring of 2020, you thought that the complaint or that Taylor was into you, uh, and you mentioned that she was flirtatious with you. Help me understand what you mean by flirtatious.

**Drew:**

Yeah, well sure. Whenever I saw Taylor, she seemed to get real excited, like was happy to see me. So like, if I went into the bar, um, she would get really like, "Hey, what's up." And just be super, seemed super like happy that I was there. Uh, she'd always serve me right away even if there was people there before me, which kinda people off, but whatever. Um, didn't charge me a lot, so give me drinks in the house. Um, when we would see each other at parties, whether it goes, were parties thrown by my fraternity or other parties, um, she would hug me and we'd like do this thing where her hand would like linger on my shoulder for like longer than normal.

**Drew:**

Um, there was more, but this was a really long time ago. Um, so I can't think of any more specific examples. I just know, like you just know when somebody is in to you, she was just interested in me. I could tell by the way she acted, it was clear to me and to my boys. I know she's saying now that she wasn't, but I'm sure that she was.

**Investigator Ware:**

Thank you. Did anyone ever... Well, let me ask you this. Did Taylor ever explicitly tell you or anyone else that she was interested in you during the spring of 2020?

**Drew:**

Not that I can remember.

**Investigator Ware:**

You mentioned that you were surprised that she put her stuff on the bed. Tell me a little bit about the hotel room, its layout. And then also tell me what was surprising to you.

**Drew:**

Sure. So the room had two beds and a small couch, Kelly and Paul put their stuff on a bed. I put my stuff on the other bed. Taylor could have claimed the couch, but she didn't. Um, and now that I think of it, when she put her stuff on the bed that I had put my stuff on, I asked her if she was cool sharing a bed. And that's when she said that she was looking forward to a good snuggle. (silence) In fact, now that I think of it, (silence)



now that I think of it, I had told her ahead of time that we might have to sleep in the same bed via text messages. Like when we were making arrangements, I told her, um, that we would be in the same room and that there might be a couch, but there might not be. And if there wasn't, we'd have, we might have to sleep in the same bed together.

**Drew:**

There's a text exchange. I don't remember exactly what it is, but I'll look for it. And if I have it, um, I'll definitely give it to you all. But I, I definitely remember her knowing that we might have to sleep in a bed together and, um, her being cool with it. But us also talking about if there was a couch, she'd sleep on the couch, and that's why I was surprised when the room did have a couch, that she didn't take the couch. She literally just was like, I'm sleeping in bed with you 'cause I want to snuggle.

**Investigator Ware:**

Well, thank you. It would be helpful if you could look for those text messages and any other text messages that would give me a better understanding of your perspective. Um, and if you could submit those to me, that would be great. And if you can find them, let me know that you can't find them.

**Drew:**

Okay. I'll, I'll definitely do that. (silence)

**Investigator Ware:**

You mentioned that after you guys got into the room for dinner, Taylor started to act a wasted. You mentioned it came out of nowhere. Help me understand, act wasted.

**Drew:**

Well, I mean, she was slurring her words, at some point she put her face in her hands and was starting to fall asleep at the table. Um, when Christina took her to the bathroom, like Christina had to help her to get there because she was in no condition to make it there on her own. Um, yeah, I mean, she was just wasted.

**Investigator Ware:**

Do you remember what Taylor was drinking or how much she had to drink between the time she joined you at the bar and when she started to behave, to use your words, wasted?

**Drew:**

I don't think she was drinking a lot, which was why I was surprised when she turned into such a mess.

**Investigator Ware:**

You mentioned that there was some text messages from Taylor to you at about 3:30 AM. Uh, do you still have those?

**Drew:**

I, I'm not sure. I have to go back. I'll, I'll go back when I'm looking for the messages about the sleeping arrangements, I'll see if I have these messages as well.

**Investigator Ware:**

Thank you. That would be great. Now I wanna to turn our attention to the physical sexual contact between you and the complainant. Um, you mentioned, uh, or you described how the context started. Let me ask you, help me understand why you believe that Taylor had the capacity to consent to sex, given your description of her earlier in the night.

**Drew:**

Sure. That's a fair question. Well, yeah, so Taylor had completely sobered up. I mean, it was at least five, maybe six hours after we put her to bed and she had puked. So that plus the fact that she was talking to me, like we're talking to each other right now, when I got in bed with her, like 3:30 in the morning, told me that she was sober. Also, she initiated it and was into it the whole time.

**Investigator Ware:**

When you say initiated it, help me understand what you mean.

**Drew:**

I mean, she's the one who put her arm around me, turned her body towards me, um, didn't pull away when I leaned into kiss her, um, she initiated the physical contact and she was engaged the entire time.

**Investigator Ware:**

Thank you. Um, help me understand the position of your body in relationship to Taylor's body during intercourse.

**Drew:**

Sure. Well, it started, like I said earlier with me on top and eventually we switched positions so that Taylor was on her knees. Um, and um, I was kneeling behind her.

**Investigator Ware:**

When you say Taylor was on her knees and you were feeling behind her, what contact was being made between your bodies at that point?

**Drew:**

Well, I mean, like at that point I was having sex with her. Like my, my dick was like inside of her.

**Investigator Ware:**

And by your dick, help me understand what you mean?

**Drew:**

My penis.

**Investigator Ware:**

And when you say inside of her, can you help me understand what part of her body you're referring to.

**Drew:**

Her, her vagina.

**Investigator Ware:**

Thank you. Now, at any point while your penis was inside of Taylor's vagina, did Taylor vomit?

**Drew:**

Absolutely not.

**Investigator Ware:**

I wanna draw your attention now to a couple of weeks ago. Do you recall like countering Taylor at Rusty's?

**Drew:**

So, yeah. Um, I did. I hadn't seen her in a while and she was there and she was by herself. So I went over to her and I ask, I did ask her why she'd been avoiding me. I never expected her to respond the way she did. I didn't understand it at all. And then I got the letter from you referring to, uh, then I got the letter from you. I was shocked. I am shocked. So I didn't rape her. I thought she had sobered up. I mean, she had, she was fine. This is just so unfair. It really is.

**Investigator Ware:**

Help me understand the way she reacted.

**Drew:**

I don't know. She just got crazy. Like I don't ever remember what she said. I went over to her and I was like, "Why have you been avoiding me?" And she was like, "Fuck you." And just basically like spun around on her heels and turned away.

**Investigator Ware:**

Did she say anything else to you?

**Drew:**

No, she literally just said, fuck you, spun on heels and walked out. I don't know if she left the bar or not, but she definitely walked away from me. It was pretty crowded that night.

**Investigator Ware:**

How did she seem emotionally?

**Drew:**

She just seemed angry. Um, she definitely seemed angry and that was pretty much it. I didn't really get it. I thought maybe she was mad 'cause I kinda started dating Lauren again, like immediately after, um, we got back. So I mentioned that I kinda was okay with her avoiding me, but, um, it was because when I got back from the formal, I reconnected with Lauren and I, you know, I, I had really loved her, when s- she broke up with me, I was devastated. And um, literally the Sunday after the formal, she texted me and said she missed me and we immediately got back together.

**Drew:**

And I'm pretty sure that Kelly and Paul told Taylor that. And so I just expected that Taylor was pissed 'cause like we'd hooked up, and then I immediately got back with my girlfriend. Um, but whatever. Um, so yeah, that's what I thought she was mad about. And that's why I was shocked when I got the letter from, I guess it wasn't you, it was the Title IX Coordinator. Um, because I didn't rape her.

**Investigator Ware:**

Is there anything else that you would like to share with me about your perspective?

**Drew:**

I'm sorry she feels the way she feels, but I'm not a mind reader. She told me she was better and she kissed me back, she was undressing me. I thought she was fine. I, I really did. That's pretty much all I have to say.

**Investigator Ware:**

Thank you.



Follow Up Interview Witness 1

**Investigator Plates:**

Good afternoon. Thank you for agreeing to meet speak with us again. I have just a few questions in follow up to our last conversation.

**Investigator Plates:**

You mentioned that on the night of the incident you were texting Taylor when you discovered that she wasn't in the hotel room. Do you recall if you tried to contact her in any other way?

**Kelly:**

What do you mean?

**Investigator Ware:**

Did you call her, attempt to DM her on any social media platforms?

**Kelly:**

It would make sense that I would have called her. It was so long ago though that I cant say for sure that I did. I know I definitely didn't DM her

**Investigator Ware:**

Help me understand?

**Kelly:**

Taylor doesn't use social media at all. She is the only person in our generation who doesn't have insta or snapchat. She wants to be a politician and her social media aversion is related to her dreams, or something like that. She basically just steals my phone and uses my accounts to be in touch with the world

**Investigator Ware:**

Thank you, Kelly.

Interview of Witness 1 Kelly H.

**Investigator Plates:**

Hello. I am Investigator Plates. Thank you for agreeing to meet with me today. My hope is that you'd be willing to talk with me a bit about, um, your observations of Taylor and Drew, um, from about the time they met, all the way through until the filing of the formal complaint. Um, are you still willing to do that, Kelly?

**Kelly:**

Uh, yes, I'm- I'm willing to do that.

**Investigator Plates:**

Right, Kelly. Um, and so I'm hoping that, uh, we could get started. And why don't you just start by sharing with me a bit about how you know Taylor and Drew. And- and what, if anything, you know about their relationship?

**Kelly:**

Sure, so, um, I have been best friends with Taylor since junior high school, we went to the same junior high. Um, we- we came here to Grand River University together as, uh, freshman and, um, we live together, currently. Uh, currently we live, um, in a house. We have 10, there's 10 of us total. Um, it is Taylor and I and then, um, we have, uh, eight other roommates.

**Kelly:**

Um, so that's how I know Taylor. I know Drew because Drew is in my ex-boyfriend, Paul's fraternity. Or was in my ex-boyfriend... or no, is, I think, in my ex-boyfriend, Paul's, fraternity. Um, so that's how I know Drew.

**Investigator Plates:**

Thank you. What are you able to tell me about your understanding of how Drew and Taylor met?

**Kelly:**

Sure, so, um... I think they knew of each other because, uh, Taylor is a, uh, bartender at Cheers, which I'm sure you know is, like, a place where a lot of people hang out. Like,

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there's like three bars in all of, um, this area and Cheers and Rusty's is... are the two most popular. And she works at Cheers. Um, and Drew definitely would, like, go there and, um, Paul, you know, and I would go there a lot. And, uh, so they knew of each other, um, but I, like, officially introduced them in the spring, like, the late spring, it was right before school ended in 2020. Um, I introduced them because Paul told me that Drew had a huge crush on, um, Taylor, for a really long time and, um, Taylor didn't really, like, notice him and wasn't really into him.

**Kelly:**

Um, and so I introduced them and then, of course, she did notice him and they became, like, friendly and they... I think they hung out a couple of times before that semester ended. Um, I don't know if they talked over the summer. I don't think they did but I don't know. And then, when we got back to school in the fall, like, I remember Drew being super-excited to see Taylor and went into the bar, like, the first Friday night, um, of the semester. So that would be fall of 2020 and, like, intentionally asked if Taylor would go to his fraternity's party the next Saturday night. Um, and I think she did. I think I saw her there. She was with some of our roommates but I, like, remember her disappearing at some point in the night and not knowing where she went. Um, and so I don't know if they hung out at that.

**Kelly:**

But then, I remember, like, things kind of, like, I remember Drew being super-excited to see Taylor and super-into wanting to, like, explore, like, I don't know, like, dating her. And then, so he asked her to the party and then the party happened and then all of a sudden, he like, didn't talk about her anymore and I don't really know what was up with that. Um, but I didn't really care, so I didn't ask because I didn't really think Taylor was into him, anyway. Like, I don't think she wanted to date him.

**Kelly:**

Um, so yeah... so, that's what I remember about the beginning of spring. And then, right before their formal, um, I was at the bar with Paul and Drew met us there and Taylor was working. And Drew came in and he was super-bummed because his girlfriend, Lauren, had broke up with him. And I suggested that he take Taylor to the

formal, instead of, um, instead of going alone because he already had, like, paid for a ticket. And Taylor agreed.

**Investigator Plates:**

Okay. That's super-helpful. Um, let me ask, uh, a little bit more about this conversation, um, about the formal. Where did that take place?

**Kelly:**

It took place at Cheers. We all were at Cheers.

**Investigator Plates:**

Okay. And help me understand, um, whose idea it was that Paul, oh wait, that Drew take Taylor to the formal?

**Kelly:**

I think it was my idea, if I remember correctly, and then, I remember Drew being like, "That's a great idea. Do you want to come?" And then I remember Taylor being like, "Sure." Kind of like, Whatever. And I remember, like, giving her the eye, like, "Come because that way we can party together and it's, like, a free night, open bar, super-cool." And so she agreed and that's pretty much all I remember. Like, it wasn't a big deal. It was like, "You should go." "Okay, I'll go. Whatever."

**Investigator Plates:**

Okay, great. Now, um, I want to focus in on the day of the formal, which was October 31st, 2020. Help me understand what you remember about that day.

**Kelly:**

Okay. Um, so I don't remember, like, most of the day. I don't really remember getting ready... I do remember that they picked us up and we all drove there together. Um... when we got there, we checked into the hotel and the guys went to drink at the bar and me and Taylor got ready in the room and we had some champagne, um, while we were getting ready or Prosecco, I don't remember which.

**Kelly:**

Then we met the guys downstairs and, like, I was trying to do my own thing. Taylor was with Drew. Um, the thing that I remember the most because this was a long time ago, is that Taylor got really drunk really fast. Um, and I was really surprised by it because she wasn't drinking more than normal and she has a really high tolerance. I have never seen Taylor like that. Not before and not since, it was scary, actually. I considered calling an ambulance but since she was vomiting and since we were able to get her to respond, didn't. But maybe I should have

**Investigator Plates:**

Tell me more about, uh, your observations of Taylor that led you to believe that she was really drunk that night.

**Kelly:**

Sure. So, um, I remember she was fine and then we all went inside to where, like, the reception, if that's what, like, you would call it is, where we were going to have dinner. And we sat down at our assigned table. Um, I remember, like, looking over at Taylor and she just put her head down on the table and, like, basically passed out at the table. She couldn't sit up on her own. I was asking her if she was okay and her responses didn't make sense.

**Kelly:**

I went to get Paul, who had left the table to mingle with some friends, because I wanted him to help me get to her room, and when I came back, she was gone. Um, Taylor was gone. Drew told me that Kristina had taken Taylor to the bathroom because she looked like she was going to puke. I went to find her and she was passed out on some chair. Um, so I really didn't know what to do because she... I couldn't get her up and she was, like, passed out on this pink... like, I don't remember. It was like a weird color, like, loveseat in the bathroom. And so I went back into the banquet room or the reception room, whatever it's called, and I asked, um, Drew to help me carry her back to their room so we could put her to sleep so she wasn't sleeping in a bathroom. Um, and he agreed and he came with me.



**Investigator Plates:**

Okay, what happened next?

**Kelly:**

Well, when we got back to the room, um, we put her in... well, wait, let me go back... So, he came in and there was a bunch of people standing around, like, trying to take care of her and she was, like, half awake, half not but like, not coherent. And he picked her up and he, like, threw her over his shoulder like a sack of potatoes, basically, is what it looked like, and carried her back to the room. And I went with him. And when we got back to the room, we put her in the bed. Um, in the bed that her... like, there was two beds in the room and Paul and I were going to be in one and her and, um, Drew were going to be in the other.

**Kelly:**

So they put her in the bed and, um, uh, s... like, right after we put her down, she started puking. And so, Drew seemed pissed off from the moment that I went to ask him for help to get Taylor back to the room. Um, and when she started puking in their bed, he got even more mad. And I remember him being like, "What the fuck!" And he raised his voice. Like, he yelled, "What the fuck!" And he was just clearly angry and he was saying things like, "Your friend is ruining my night. Thanks for hooking up... me up with a fucking mess. I'm so glad you spent money to take care of a drunken asshole." I think he said something like, "I don't need this shit." And then him and I got into it and we started to argue with each other because he was being an asshole. I told him to go back to the party and that I would take care of her and he did.

**Kelly:**

So, I stayed with Taylor in the hotel room for about an hour before I went back down to the party myself. Um, I cleaned up the vomit, or at least, I did my best to clean up the vomit that had gotten on the bed. And I just, like, laid with her and made sure she was, like, breathing, which she was. And, um... but she was, like, out. Like, I would have to shake her really hard to get her to wake up. And so, after about an hour, um, I went back to the party and then I was checking on her, like, every, I don't know, like, 45 minutes throughout the night. Because it wasn't a long walk from our room from where the party was, um, so I kept checking on her.

**Kelly:**

(Silence)

**Investigator Plates:**

Are able to share more about the number of times you checked on her throughout the night?

**Kelly:**

Well, I think I left her at around 10:30 and then I definitely went back, I remember, close to, like, midnight and then I went back again, around 1:00 and then I went back around 2:30 and she wasn't there. Um, so, when I went back around 2:30 and she wasn't there, I started to panic. Um, I started to look everywhere for her, the bar, the bonfire, the public bathrooms in the hotel and resort. Um, I finally found her stumbling down a random hallway by herself. She was barefoot and she was tripping over her dress. She seemed a little bit better, but she was still really drunk.

**Investigator Plates:**

So, what are you able to tell me about what happened next?

**Kelly:**

Um, so I like went over to her, put my arm around her. I was like, "What are you doing?" And she was like, "I don't know where I am." I remember her just being like, "I don't know where I am. I don't know where I am." And, um, so I told her it was okay and I walked her back to her room. Um, when we got there, I helped her use the bathroom. Um, she ate some chips and I think I gave her water. Um, I definitely gave her water. And... we- we talked a little bit and then, um, I put her back in bed and she immediately passed out. Um, once she passed out, I left the room and I don't think I went back until sometime the next morning.

**Investigator Plates:**

Now, you said that, um, she drank some water. Are you able to share more about how much water she had?

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**Kelly:**

Yeah, um, it was a 20 ounce bottle of water, uh, because it was my, like, my water bottle and I filled it twice, and I think she drank both of them. Um, so yeah, probably like, 40 ounces of water. I remember telling her to drink them fast because I didn't want her to be dehydrated because she had puked quite a bit. And I didn't want her to feel like shit the next day.

**Investigator Plates:**

You've also said that you were speaking while you were in the room. Help me understand what you spoke about.

**Kelly:**

Sure. So, she just kept apologizing and saying that she didn't understand how she'd gotten so drunk. Her speech was still pretty slurred but at least she was somewhat coherent at that point.

**Investigator Plates:**

You mentioned that she immediately passed out. Help me understand.

**Kelly:**

Well, I mean, like, she lay down in bed, put her head on the pillow and then, like, within minutes was snoring. She snores, so she was snoring, um, and that's when I left the room.

**Kelly:**

(Silence)

**Investigator Plates:**

Now, you mentioned that you didn't go back to your room until the next morning. Um, help me understand where you were that night.

**Kelly:**

Sure, so, uh, when I left her in the room around, I would say around 3:00, um, maybe 3:30, it was, like, 3:00, 3:30, I, uh, I left her and then, um, I went back, um... I went

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back... Actually, Paul went back to the room sometime after to get, like, I don't know what he was getting. I think, honestly, he went to get some weed that he had brought and when he came down, he was like, "That room smells like puke. I'm not sleeping in there tonight."

**Kelly:**

And so, one of his other fraternity brothers, um, had a, had a double room to himself. Like, him and his date had a double room to himself and so we landed up crashing in that room and... instead of going back to our room, because Paul didn't want to sleep in there because, like I said, the room's... he thought the room smelt like puke.

**Investigator Plates:**

Do you remember whose room you and Paul stayed in that night?

**Kelly:**

Um, honestly, I don't remember. It was one of his fraternity brothers who was, like, younger than him and I didn't know him well. Um, and we didn't really interact with him or his girlfriend or the girl he was with.

**Investigator Plates:**

Okay. Now, um, what are you able to tell me about the next morning?

**Kelly:**

Sure. So, um, the next morning, uh, I got some text messages from... Taylor asking me to come back to the room. Um, actually, no, I think about... Now that I think about it, that night, when I was looking for her, I was texting her. Um, so, you know, the night... when I went in the room and I couldn't find her, I was texting her and she didn't text back. But the next morning she texted me and she basically asked me to come back to the room. Um, I don't remember exactly what she said but I can go back and look, um, if you want me to. But she texted me and asked me to come back.

**Kelly:**

And so I woke up Paul, it was pretty early, uh, and we went back to the room. And when we walked in, Taylor was not herself. She immediately said she wanted to leave. She looked so upset that, um, me and Paul didn't ask any questions we just started

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packing up. When... Drew came back into the room, we told him we were leaving immediately and that he could stay and catch a ride with someone else if he wanted. He started back up too, though, and we left.

**Investigator Plates:**

What are you able to tell me about your observations of Drew and Taylor in the room that morning?

**Kelly:**

Honestly, I don't remember them talking to each other. I just remember that we, like, packed in a hurry and we left.

**Investigator Plates:**

And what are you able to tell me about the car ride home?

**Kelly:**

Sure. I don't really remember that either, if I'm going to be honest with you. I was pretty hungover. Um, I drank quite a bit myself, the night before... well, that's not true. Um, I started out partying hard and then, after Taylor got sick, I kind of stopped drinking. But I was still tired, it was a late night and so, like, I just... I don't really remember the car ride home. I do remember, though, that when we got to our apartment, Taylor got out of the car and just kind of like slammed the door shut and went into the house. She didn't say goodbye, she didn't say thank you. Um, it wasn't like her, you know, to just leave without even saying goodbye or thank you.

**Investigator Plates:**

And did you, uh, go home too or did you go somewhere else?

**Kelly:**

No, I didn't go back to the apartment, um, with Taylor, instead I went back to Paul's house and I stayed there for the rest of the day and maybe through the weekend.



**Investigator Plates:**

Thank you. Now, um, you mentioned that you had drank, yourself. Can you help me understand your level of intoxication the night of October 31st, 2020 into the morning of November 1st, 2020?

**Kelly:**

Sure, so like I said, I partied hard at the beginning of the night, um, but I pretty much stopped drinking after Taylor got sick because I wanted to be able to take care of her.

**Investigator Plates:**

Thank you. What are you able to tell me about your observations of Taylor in the weeks following the formal?

**Kelly:**

Yeah. So, she was not herself. Um, she basically became a hermit. She, like, stopped going out for a few weeks. Um, when she did start to go out again, she was always with Joe and Brett, who are our roommates. Um, it actually kind of got weird. She didn't go anywhere without them. She totally stopped hanging out with me and Paul, unless we were at Cheers or my apartment. Didn't go to the fraternity parties anymore, didn't go to any fraternity parties anymore. It was like, almost like she was avoiding any place where she might run into Drew.

**Investigator Plates:**

And did she ever tell you that she was avoiding Drew?

**Kelly:**

No. Um, she basically didn't say his name again to me until a few weeks ago.

**Investigator Plates:**

Tell me about a few weeks ago.

**Kelly:**

Sure. So, um... so, Taylor had been out at the bars, I think she was at Rusty's. She came storming in my room at, like, 2:00 in the morning and woke me up. I think she was

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drunk. She was definitely really angry. She started pacing back and forth and she told me that the night of the formal, she had woken up to Drew having sex with her. She kept saying, "He was laughing. He thinks it's funny." I had no idea what she was talking about. I remember she stopped pacing and she looked at me real serious and said, "He's not going to be laughing when I report his ass for raping me." And then she left my room.

**Kelly:**

I just sat there, I didn't know what to do. But she was so angry I let her go. I tried to talk to her about it the next day but she said it would be better if we didn't, because I would be a witness.

**Investigator Plates:**

W- what observations, if any, did you make of Drew in the aftermath of this? Of the... in the aftermath of the formal?

**Kelly:**

Sure, so Drew got, like, back together with Lauren, literally that day. Like, when we got home, they were back together. I remember I was at their place because Drew and Paul live together, and I remember Lauren coming in and them being, like, behind closed doors. And then the next morning, so I must've spent the night that night, coming out and, like, they were a couple again. And I remember thinking that that was kind of fucked up because I knew that, like... well... I don't know. I just thought it was fucked up because he was just with Taylor but, I don't know.

**Investigator Plates:**

And do you recall whether or not you shared with Taylor that Drew and Lauren were back together?

**Kelly:**

I don't think I told her. Um, I don't think I told her.

**Investigator Plates:**

And when was the first time that you learned that there was sexual contact between Drew and Taylor the night of the formal?

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**Kelly:**

You know, uh... I don't think it was till a couple of weeks ago. Like, I just didn't, I didn't know. She never mentioned it to me. He never said anything to me, um, I just... I don't know. I didn't, I... I don't, I don't know, but I think it was when she came into my room after being out at Rusty's that night. Talking about how he had raped her.

**Investigator Plates:**

What other observations did you make of- of Taylor's, uh, after... following the formal?

**Kelly:**

Um, yeah, like I said, she stopped going out, um, always with Drew and Brett. Um... she just was different. She just didn't have, like, the same, like, joy that she used to have. She used to be really friendly and out-going and excited about life and that seemed like... it was like a light went out in her, is the best way to say it. And I never understood it, um, and I... you know, we've been friends for a really long time. I tried to talk to her, like, "What's..." about it. "What's going on with you?" And she would just say that she's overwhelmed with school and with work, um... And then also, there was some drama that happened so... I don't know if this is important.

**Investigator Plates:**

Go ahead and share.

**Kelly:**

Sure, so, um, so apparently, it came out, like, maybe two months... no it was, it was after winter break so it was early spring of 2021... No, that can't be right. So it was over winter break because a lot of us stayed up to work. And it came out that, um, my roommate Joe and Taylor had been, like, hooking up for a really long time and nobody knew about it. And they had, like, kept it secret because Joe had a girlfriend who he'd been trying to break up with but, like, was not getting the message.

**Kelly:**

And also, Taylor had been in a relationship with one of our other roommates, for a really long time, and they were completely over. But, like, Taylor and John were together for, like, a year and a half. Our, like, our whole freshman year and most of our

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sophomore year, and Joe and John are really good friends. And John took the breakup really bad and I think they didn't want to hurt John, and so they kept, like, their relationship or whatever was going on between- between them secret. And, um, basically, over winter break, John kind of caught them hooking up and there was a lot of drama in the house.

**Kelly:**

Like, John wound up moving out. Um, it ruined John and Joe's friendship. Um, Taylor felt really, really bad about it. Um, so it was, it was a lot of drama and she would say that that was part of the reason that she wasn't herself too.

**Investigator Plates:**

Thank you. Is there anything else you think I should know?

**Kelly:**

Yeah, I mean, I don't think Taylor would lie about something like this. Like, we've been friends forever. She's always been honest. Um, she's not a vindictive person. I know that Drew was trying to say that she was, she's like, making this up because she's mad that they hooked up and then he got back together with Lauren. But that doesn't even make sense because she didn't like Drew before that and I... she didn't mention him after. And I don't even know if she knew that him and Lauren got back together. Like, I honestly don't know, because it was never mentioned. But I just can't see why she would make this up.

**Kelly:**

The other thing is that, like, Drew has a reputation, um, for... like, I've heard rumors that Drew, like, talks about, "Well, if you get a girl drunk enough, you can pretty much do whatever you want with her." And, um, Paul told me that Drew used to joke around about how they should put extra... they should have a separate punch for women at their parties, that had higher alcohol content so that the girls would get drunker so that the boys could get lucky. And I- I mean, that's basically what Paul told me, um, and so you'd probably want to talk to him about that, but I- I just... like I said, like, I believe her. I don't think she would lie about this and I think that Drew is a scumbag.

**Investigator Plates:**

Thank you. Anything more that you'd like to share?

**Kelly:**

No, that's it, but if there's anything else you need from me, please do let me know.

**Investigator Plates:**

Yes, actually, the text messages you referred to, any messages that you have, videos, photographs, anything that you could look through that could be helpful to us, if you wouldn't mind sharing that would be great.

**Kelly:**

Thanks, I will do. Have a good day.

**Investigator Plates:**

Thank you, you too.





Follow Up Interview Witness 3

**Investigator Ware:**

Good afternoon. Thank you for agreeing to meet speak with me again. I have just a one questions in follow up to our last conversation. It may seem a bit weird, but I am hoping you might answer it.

**Joe:**

Sure. Anything to help Taylor.

**Investigator Ware:**

What can you tell me about Taylor's use of social media?

**Joe:**

I've never known her to use it.

**Investigator Ware:**

Do you know if Taylor had a snapchat account.

**Joe:**

I mean everyone has snapchat.

**Investigator Ware:**

Did Taylor?

Joe:

Now that you ask, I don't know. If she did, we weren't friends which wouldn't make sense. So now that I think about it, no. I don't think Taylor has a snap account. We mostly just text or talk on the phone. We're old school that way.



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### Interview Witness 3

**Investigator Plates:**

Good afternoon. Thank you for agreeing to meet speak with me. I am investigator Plates and this is investigator Ware.

**Joe:**

Sure. Happy to help if I can.

**Investigator Plates:**

It would be great if you can start by sharing how you know Drew and Taylor.

**Joe:**

Taylor and I have been friends since our first year and have been roommates since our second year. We both work at Cheers. She tends bar and I am a bouncer. That's how we met.

I know Drew but not well. We are not friends. I do clearly recalled the weekend that She went to that formal with him. It was Halloween weekend, a big money making night at the bar. I remember being surprised that Taylor took the night off to go. I thought it was strange.

I don't know anything about what had happened at the formal, as you know I was not there.

**Investigator Plates:**

What can you tell us about your observations of Taylor on November 1, 2020.

**Joe:**

I was in the kitchen with Brett when she came home. I remember it clearly. Taylor came through the door and she looked like she'd been hit by a truck. She was a mess. Her hair was tangled and matted. Her shirt was on inside out. She was pale and her eyes were so red they were glowing. Not like hangover red, but crying red. Before I even said anything, she started to cry. Hard. I didn't know what to do, I froze. I'm not

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good with crying girls. Brett, he has three sisters. He went right over to her and gave her a hug.

Tay was crying so hard, she was shaking. I asked her what happened and she told us that it was the worst night ever and that she just needed to go to bed. And she did. I didn't see her again, for a few days, which wasn't normal.

**Investigator Plates:**

Tell us more.

**Joe:**

Taylor was different after that weekend.

**Investigator Plates:**

Help us understand.

**Joe:**

It's hard to explain. She was less independent, I guess. She started sticking really close to me and Brett, which we were totally ok with. She's like a sister to me and I have always looked out for her. Before that weekend, she would get annoyed when we were overprotective of her. After that weekend, it was like she was grateful for it.

**Investigator Plates:**

What are you able to tell us about your understanding of Taykors reports against Drew?

**Joe:**

I know that something happened, but that I don't know the details. She wont speak about that weekend. I have asked a bunch of times in the last few several months what Drew did to her that night. She wont say a thing. Tay and I are really close. I love her. It kills me to see what this has done to her. She went from this happy, outgoing secure and independent woman to something different. Its like her fire went out. Its so strange because in one way we have gotten closer since it happened and in another more distant.

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**Investigator Plates:**

Help us understand?

**Joe:**

Well she is physically with me more. She always wants to go to and from work together. She stays close when we are out, especially if shes drinking. But emotionally, she has shut down form me. Does that make sense?

**Investigator Plates:**

Thank you. Is there anything more we should know?

**Joe:**

Yes. She isn't a liar and this hasn't been fun for her. There is nothing in it for her to make this up. That's all.



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**Interview Witness 5**

**Investigator Plates:**

Good afternoon. Thank you for agreeing to meet speak with me. I am investigator Plates.

**Christina:**

Sure. Happy to help if I can.

**Investigator Plates:**

It would be great if you can start by sharing how you know Drew and Taylor.

**Christina:**

Sure. So I am a sister of national sorority. SEO is our brother fraternity and I am close with all the brothers of SEO, including Drew. I only know Taylor from Cheers and from being at the same table as her at the formal.

**Investigator Plates:**

We are hoping you can share with us your observations of Drew and Taylor at the formal on October 31, 2020.

**Christina:**

So it was a while ago. But I remember that Taylor got really wasted really early in the night. I means she was passing out at the dinner table fifteen minutes after we sat down. As one-point she tried get up to use the ladies room and she went down. I felt bad for her, so I helped her get to the bathroom. She couldn't walk on her own; she was leaning on me for support. She's a real small girl and I'm pretty strong, so I was able to get her into a stall. I was waiting for her and a few other girls came in and I started chatting with them. While we were talking, I heard a crash and Taylor was on the ground. Another girl actually crawled under the stall door to unlock it and we picked her up and put her on this ugly pink loveseat in the bathroom. We were all taking care of her when Kelly and Drew came in and got her. That was the last I saw of her for a while.

**Investigator Plates:**

When did you see Taylor next?

**Christina:**

It was a long time later. Maybe like five hours? I was at the bar with Matt and a few others when Taylor came waddling in. I don't remember this as clearly as the beginning of the night because at this point, I was lit as fuck. But I am sure I saw her and I know it was around 2:30 a.m. because I sent Respondent a text letting him know that his date was in the bar area.

**Investigator Plates:**

What are you able to tell us about your observations of Taylor's physical appearance at this point?

**Christina:**

I honestly don't know. She was there. That's it.

**Investigator Plates:**

What are you able to tell us about your observations of Taylor's behavior at this point?

**Christina:**

Again, same answer.

**Investigator Plates:**

Do you recall seeing her with Drew?

**Christina:**

I don't remember Drew being there. In fact, I'm pretty sure he wasn't. I checked my phone and it looks like I texted Drew to let her know that Taylor was at the bar. I wouldn't have done that if he was there. Also his response makes clear that he wasn't. People were all over the place. There was a fire outside, there were two other bars in the place. So he wasn't there.

**Investigator Plates:**

Do you have those messages and are you willing to share.

**Christina:**

Sure. They are here.

**Investigator Plates:**

May I hold your phone to read them?

**Christina:**

Absolutely.

**Investigator Plates:**

Thank you. In this exchange you tell Drew that Taylor did a shot. Tell me more.

**Christina:**

Yea. I'm not sure if that happened or if I was joking. I've tried to remember, but I honestly don't know. Like I said in the text messages, I was pretty intoxicated at that point. I had drank a lot and my friends and I did a bunch of edibles.

**Investigator Plates:**

Thank you. Is there anything else that you can share with me.

**Christina:**

I really feel bad saying this. But that girl was fucked up. Drew is my friend, and I don't think he would intentionally hurt anyone and he was also drinking so maybe his judgement wasn't the best. But I mean, yea. The only think that should have happened to Taylor that night was that someone should have put her to bed and watched her to make sure she didn't die. I mean maybe she sobered up. I don't know. I just think...I don't know. I feel bad for them both.

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Interview Witness 6

**Investigator Plates:**

Good afternoon. Thank you for agreeing to meet speak with me. I am investigator Plates and this is investigator Ware.

**Matt:**

Yea, so before we get started, I know what you want to talk to me about. I really cant help you though.

**Investigator Ware:**

Tell us more.

**Matt:**

So not my proudest moment, but I was pretty wasted that night myself. I don't remember a thing. I drank almost a full bottle of tequila myself before we even went to the cocktail party. I had just found out that I had gotten into my first choice law school. I celebrated a little too hard I guess.

**Investigator Ware:**

Understanding that you cant share anything about the night at issue, can you share anything with us that might help us understand the matter we are investigating?

**Matt:**

I'll say this. Drew is a good guy. One of the best I know. He's not a liar. He's also not the kind of dude that needs to rape a girl to have sex. I mean before he was with Lauren, he was with a different girl everynight. I just think that this chick is pissed because he hooked up with her and then got back with Lauren. I also heard that Taylor was hooking up with one of her roommates at the time. Maybe she didn't want him to think she was like, cheating on him or whatever.

**Investigator Ware:**

Thank you. Have you had the opportunity to talk to Drew about these allegations?

**Matt:**

Of course. We are best friends.

**Investigator Ware:**

What are you able to tell me about those conversations?

**Matt:**

So, yea. I am not going to betray his trust like that. I will say I know he didn't do this.



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Transcript Witness 7

**Investigator Plates:**

Thank you for agreeing to speak with me. I have now started the recording and we can get started with my questions if you are ready.

**Lauren:**

Yup

**Investigator Plates:**

Help me understand how you know the parties, Drew and Taylor.

**Lauren:**

Drew and I have been dating since last fall. We broke up for a week or so around Halloween but got back together on November 1, 2020 and have been together since. I don't know Taylor other than from what people tell me about her and from ordering drinks from her at Cheers.

**Investigator Plates:**

What are you able to tell me about the events of October 31 into November 1, 2020?

**Lauren:**

I can't tell you anything. I wasn't there, unfortunately and I have to live with that.

**Investigator Plates:**

Help me understand live with that?

**Lauren:**

If I hadn't broken up with Drew for no reason, I would have gone to the formal with him. They would have never hooked up, and she wouldn't be mad enough about us getting back together to make up this awful lie.

**Investigator Plates:**

Tell me more.

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**Lauren:**

Well clearly she is just mad that he had sex with her and then got back with me. In fairness, I'd be mad, too. I wouldn't like about rape though. But girls do crazy things when they are hurt.

**Investigator Plates:**

Have you spoken with Drew about his experience that night?

**Lauren:**

No. we agreed to never discuss it because I get too upset. I don't like to think of him sleeping with another girl. I know we were broken up, but still.

**Investigator Plates:**

Have you spoken with Taylor about it.

**Lauren:**

Absolutely not. We don't speak. I cant even go to Cheers anymore because she works there.

**Investigator Plates:**

You mentioned that Taylor is mad at Drew for getting back together with you. Do you know when and how Taylor became aware that you were back together?

**Lauren:**

Sure. So on that Sunday after the formal I texted Drew that I missed him. He said he missed me too and I went to his place. We talked it out and he told me that him and Taylor hooked up. I asked him to text her to tell her that we were back together and that it couldn't happen again. He refused to do that, which really upset me. But whatever. Anyway, about a week later, I told her.

**Investigator Plates:**

Tell me about your conversation with Taylor.

**Lauren:**

I just told her that we were back together and that she needed to respect that.

**Investigator Plates:**

How did she respond?

**Lauren:**

She was really jealous. She said something about Drew having a small dick and dad bod. Which, I can tell you from experience is not at all true. She just lashed out and then she lashed out again by making this report.

**Investigator Plates:**

How did this conversation occur?

**Lauren:**

I found her on either insta or snapchat. I don't remember which.

**Investigator Plates:**

**Do you still have those messages?**

**Lauren:**

I don't.

**Investigator Plates:**

Is there anything more that you think we should know?

**Lauren:**

Other than that Drew would never do what Taylor is accusing him of. He always asks for consent. Sometimes its too much. I mean he still asks me if he can kiss me every time he kisses me. He just isn't capable of what she is saying.

**Investigator Plates:**

Thank you, Lauren.