NEW YORK LAW SCHOOL

Since 1891

WE ARE NEW YORK'S LAW SCHOOL

Thirty-Fifth Annual Campus Security Report and Seventeenth Annual Fire Safety Report

2026 Annual Report for Calendar Year 2025

Office of Security and Life Safety
185 West Broadway
West Campus Building
Room W102.2
New York, New York 10013

T: 212.431.2123
F: 212.274.9211
E: **security@nyls.edu**
Main Number: 212.431.2100
Visitor Center: 212.431.4185
Emergencies: 212.431.2123 or 911

October 1, 2026

Contents

A Year in Review and a Message 3
The Clery Act 4
Timely Warning and Emergency Notifications Policy 4
Stop Campus Hazing Act Policy 7
9-8-8/Suicide & Crisis Lifeline Policy 7
Workplace Violence Prevention Policy 8
Rules for the Maintenance of Public Order 8
Marketing of Credit Cards Strictly Prohibited 8
Office of Security and Life Safety 9
Crime and Fire Records 10
Advisory Committee on Campus Security 11
Emergency Preparedness, Evacuation, and Notifications 11
Notify NYLS 11
NYLS Campus Buildings 12
Crime Prevention Education and Awareness 13
Reporting Criminal Incidents 14
Seeking Support and Disciplinary Actions 16
Crime Victim Hotlines 17
Missing Student Procedures 17

NYLS Policies

NYLS Drug and Alcohol Policies 18
NYLS Policy Related to Weapons 19
Notice of Non-Discrimination 20
Sexual Misconduct Policy 21
Fire Safety 32
Campus Crime Statistics (On-Campus and Non-Campus Properties) 38

Appendix 1: Relevant Statutory Provisions 42
Appendix 2: Definitions Related to VAWA Offenses 48
Appendix 3: Definitions Relevant to the Stop Campus Hazing Act 52
Appendix 4: Procedures for institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, or stalking 53
Appendix 5: Fire Safety Definitions 66
Appendix 6: New York Law School Fire Statistics 67

Continued on next page

A Year in Review

A Message from Dennis DeQuatro, Vice President of Security and Community Affairs

We are pleased to present the Thirty-Fifth Annual Campus Security Report and Seventeenth Annual Fire Safety Report ("Report"). This Report, which covers calendar year 2025, was prepared by the NYLS Chief Compliance Officer and Office of Security and Life Safety in compliance with the Jeanne Clery Campus Safety Act, and is intended to communicate vital statistics and information to all current and future members of the New York Law School community. This Report includes information about our safety procedures and policies, along with current crime and fire safety data for the past three years, as mandated by federal law.

Specifically, this Report is the result of an ongoing collaboration among various administrators and offices within the Law School community, including the Dean and President, the General Counsel, the Chief Compliance Officer, the NYLS Title IX Coordinators, the Office of Security and Life Safety, the Office of Student Life, the Office of the Registrar, the Office of Admissions and Financial Aid, and the Office of Human Resources. Each of these individuals and offices has a role in formulating, reviewing, and updating the various important policies discussed in this Report and in reviewing the contents of this Report prior to publication. As discussed in this Report, the crime statistics reported herein are generated based on reports of relevant crimes documented by the Office of Security and Life Safety or reported to the Law School by the New York City Police Department (NYPD).

The Office of Security and Life Safety is committed to providing the New York Law School community with the finest service possible to make our campus a safe and welcoming environment for all. Our security team is made up of seasoned professionals, including employees of New York Law School and others employed via contract services through our partner Arrow Security. The Office's initiatives over this past year included working with various departments and community members to improve operations and making various security upgrades to make our campus a safe place for every community member.

We would like to thank each member of the community for collaborating with us to keep our campus safe and we look forward to being of continued service to you in the coming year. We also acknowledge the dedicated in-house security team members, as well as the entire contract services team, under the leadership of:

- Sean Frett: Manager of Security and Life Safety
- Halbert Pacheco: NYLS Supervisor
- Steven De Jesus: NYLS Supervisor

The Law School makes available printed copies of this Report for students through the Office of Student Life (55 Worth Street, C532, 212.431.2851), for prospective students through the Office of Admissions and Student Financial Services (185 West Broadway, W101, 212.431.2888), and current and prospective employees through the Office of Human Resources (55 Worth Street, E613, 212.431.2131). Copies of this Report will be available from the literature rack on the first floor of 55 Worth Street adjacent to the Office of Information Technology Helpdesk, C108. This Report is also available at the Offices of Facilities Management (E Building Mezzanine) and Security and Life Safety (W102.2), and online at **https://www.nyls.edu/campus-security-and-fire-safety-report**.

We look forward to building upon the strides we have made together this past year.

Continued on next page

The Clery Act

The Jeanne Clery Campus Safety Act, more commonly known as the Clery Act, was named in memory of Lehigh University first-year student Jeanne Clery, who was assaulted and murdered on April 5, 1986, in her residence hall by a fellow student she did not know. The Clery Act requires all colleges and universities that participate in any federal program to do the following:

- Publish an annual report by October 1 that contains all campus crime and fire safety statistics for the past three years as gathered by the Office of Security and Life Safety. Beginning with this 2026 report, statistics regarding hazing incidents will be reported, in accordance with the 2024 Stop Campus Hazing Act.
- Issue emergency notifications involving health or safety to all community members.
- Maintain a public fire log record of any fire that occurred on campus, including any student housing. Please note that New York Law School currently does not maintain any student housing facilities.
- See Appendix 1, p. 43 for more information about the Clery Act.

You may view the statistics reported to the Office of Post-Secondary Education by visiting its website, **https://ope.ed.gov/security**. Compliance with the Clery Act does not violate FERPA or any other law. Community members who report crimes or who are involved in any aspect of compliance are protected from retaliation.

Timely Warning and Emergency Notifications Policy

In the event of criminal activity occurring on the NYLS campus, or on certain other property, that constitutes a serious or continuing threat to members of the campus community, a campus-wide Timely Warning will be issued to all students and employees. The intent of a Timely Warning is to aid in the prevention of similar crimes, including helping members of the NYLS community protect themselves. Anyone with information regarding criminal activity that may warrant a Timely Warning should immediately report the circumstances to Dennis DeQuatro, Vice President of Security and Community Affairs, at **dennis.dequatro@nyls.edu** or 212.431.2859, or to another Campus Security Authority (see **Campus Security Authorities Policy**). In an emergency, please call 911.

The Law School has a Memorandum of Understanding with the NYPD, revised in May 2024, to foster cooperation and information-sharing. NYLS has asked the NYPD to notify the Law School if they receive reports or information warranting a Timely Warning. In addition to the Timely Warnings that the Law School is required to issue pursuant to the criteria set forth herein, NYLS may also issue Emergency Notifications, when appropriate. Emergency Notifications are issued concerning significant emergencies or dangerous situations involving an immediate threat to the health or safety of students or employees, occurring on or in the vicinity of the NYLS campus. NYLS will without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system unless issuing the notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency.

Continued on next page

Timely Warning Criteria

NYLS will issue a Timely Warning when the following criteria have been met:

- A crime is reported to NYLS, or NYLS is otherwise made aware of the incident. For example, if the NYPD notifies the Law School that a crime has been reported to that agency;
- The crime is reported to have occurred on the Law School's "Clery geography," which generally includes NYLS's buildings, adjacent public property (e.g., streets and sidewalks), and other properties owned or controlled by NYLS;
- The crime is a Designated Crime (see below); and
- The circumstances present a serious or continuing threat to the NYLS community (see below). NYLS has the discretion to issue Timely Warnings in other situations as well.

Designated Crimes

Assuming all other criteria have been met, crimes and events necessitating a Timely Warning are stated below.

Primary Criminal Offenses include murder/non-negligent manslaughter; manslaughter by negligence; rape; fondling; incest; statutory rape; robbery; aggravated assault; burglary; motor vehicle theft; and arson.

Hate Crimes are criminal offenses that manifest evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. Hate crimes include: murder/non-negligent manslaughter; rape; fondling; incest; statutory rape; robbery; aggravated assault; burglary; motor vehicle theft; arson; larceny-theft; simple assault; intimidation; and destruction/damage/vandalism to property. The eight categories of bias that may result in a hate crime designation for purposes of this policy are as follows: race, gender, gender identity, religion, sexual orientation, ethnicity, national origin, and disability.

Violence Against Women Act (VAWA) Offenses include sexual assault, dating violence, domestic violence, and stalking.

Arrests and Disciplinary Referrals for Disciplinary Action as a result of the following violations, include: drug abuse violations, liquor law violations, and weapons violations (e.g., carrying, possessing, etc.).

See Appendices 1 and 2 to this Report for more information about these definitions.

Serious or Continuing Threat Analysis

The Vice President of Security and Community Affairs, Dennis DeQuatro, or his designee, in collaboration with the General Counsel and senior members of the Administration, as necessary, is responsible for determining what constitutes a serious or continuing threat to the NYLS community. This evaluation is completed on a case-by-case basis in consideration of the relevant circumstances. There may be instances when a Designated Crime occurs on NYLS's Clery geography, but the situation does not present an ongoing danger to the NYLS community; thus, it would not necessitate a Timely Warning. For example, a robbery on or near NYLS may have been reported, but the suspect was immediately apprehended by police and therefore, presents no ongoing danger to the NYLS community. The factors used when analyzing whether a reported crime presents a serious or continuing threat to the campus community include, but are not limited to:

Continued on next page

- How much time has passed between the incident and the report?
- Has the perpetrator been apprehended?
- Were there multiple perpetrators working together?
- Was the incident violent in nature?
- Were date rape drugs or other substances used to facilitate the crime?
- Was a weapon used during the commission of the crime?
- Does the incident appear to be an isolated incident with a specifically targeted victim(s)?
- Is there a pattern of similar incidents? (e.g., the same or similar crimes occurring in a short period of time, a particular group being targeted on multiple occasions, etc.)
- Are there other aggravating circumstances or predatory behaviors at issue suggesting that a threat/ongoing danger exists?
- Are there enough details available to determine whether a threat/ongoing danger exists?

Timely Warning Content

Because the intent of a Timely Warning is to aid in the prevention of similar crimes, including by helping members of the NYLS community protect themselves, the Warnings will include information that NYLS determines is necessary and appropriate to further these goals. The content of a Timely Warning will, at a minimum, include pertinent information about the crime that triggered the Warning (e.g., type of crime and a description of where and when it occurred). The Warning may also provide other brief information about the situation if warranted, such as any available information about the suspect(s). However, caution will be taken to not issue such a lengthy Warning that it cannot be quickly understood by recipients. Names of victims will be withheld from Timely Warnings, and NYLS will also refrain from including information that could compromise law enforcement efforts.

Timely Warning and Emergency Notification Methods

Timely Warnings and Emergency Notifications will be communicated to all students and employees via mass email or the Notify NYLS system. The Notify NYLS system requires both students and employees to register. Students may register by logging in to **https://go.nyls.edu**. Staff may register at **https://notifynyls.bbcportal.com/**. NYLS may also supplement the email and Notify NYLS notifications with other methods, such as hard copy postings on campus, messages on video monitors located throughout the building, and more. Timely Warnings and Emergency Notifications will be posted on **http://www.nyls.edu** as well as **http://emergency.nyls.edu**. Information may also be provided by the NYPD.

The Vice President of Security and Community Affairs, Dennis DeQuatro, or in his absence, the Manager of Security and Life Safety, is responsible for ensuring that Timely Warnings and Emergency Notifications, and any updates thereto, are sent to all students and employees.

Updating the Timely Warning

After a Timely Warning or Emergency Notification has been issued, the Law School will consider whether a follow-up warning or notification is necessary. If it is determined that a follow-up warning is necessary, it will be made in the manner described above.

Continued on next page

To view the complete Timely Warning and Emergency Notifications Policy, go to **https://www.nyls.edu/timely-warning-and-emergency-notification-policy**.

Stop Campus Hazing Act Policy

In December 2024, President Biden signed the Stop Campus Hazing Act ("SCHA"). SCHA requires institutions of higher education to: (a) beginning January 1, 2025, collect statistics on reported incidents of hazing; these statistics will begin to be reported in this 2026 Annual Campus Security Report; (b) by July 1, 2025, publish a statement of current policies related to the reporting of, and investigation into, incidents of hazing (including incidents reported to campus security and local law enforcement officials) and a statement of policy regarding any programs into the prevention and awareness of hazing for students, staff, and faculty (which may include skill-building bystander intervention workshops, information about ethical leadership, etc.); and (c) beginning by December 1, 2025, publish a "Campus Hazing Transparency Report" twice a year that will disclose each incident for which a finding of responsibility for hazing was issued against a student organization that is institutionally recognized. New York Law School interprets the SCHA to not require the publication of a Campus Hazing Transparency Report when an institution does not receive a report of hazing in a given reporting period. The Law School did not receive any reports of hazing in 2025 and, accordingly, did not publish a Campus Hazing Transparency Report in 2025. The **New York Law School Anti-Hazing Policy** was issued on April 30, 2025. The Policy provides that:

- Student organizations and their members are prohibited from engaging in acts of hazing, as defined under federal or state law (as stated in the Policy), against members or prospective members of such organizations.
- Incidents of hazing may be reported to the Office of Student Life or by using this **form**. Such reports may be made anonymously, and anyone making a report of hazing shall be protected from retaliation for having done so.
- Reports of hazing shall be investigated promptly by the Vice President for Security and Community Affairs in collaboration with the Chief Compliance Officer and other NYLS administrators as may be required.
- To prevent hazing and raise awareness about the dangers of hazing, NYLS will conduct anti-hazing training for incoming students as part of First Year Student Orientation, and for upper-level students, with an emphasis on student organization leaders, at least once during each academic year. The Office of Student Life personnel, Campus Security Authorities and student organization faculty advisors also will receive training on the importance of hazing awareness and prevention. All training will be grounded in best practices developed by experts in the field of hazing prevention. The Law School will also conduct periodic surveys of the NYLS Community to ascertain the prevalence, if any, of hazing on campus.
- Violation of the Policy may result in discipline of individual students in accordance with the NYLS Student Code of Conduct and Academic Responsibility, and suspension or revocation of a student organization's Constitution or privileges. NYLS may also refer students in violation of this Policy for criminal prosecution should the facts warrant.
- The Policy shall be deemed incorporated into the Constitution of each NYLS Student Organization.

9-8-8/Suicide & Crisis Lifeline Policy

In September 2024, Gov. Kathy Hochul signed the Student Lifeline Act, amending the New York Education Law to require degree-granting higher education institutions to educate students, faculty and staff about New York's 9-8-8 Suicide and

Continued on next page

Crisis Lifeline. According to the Act, New York higher education institutions must (1) share with students, faculty and staff resources that describe when to dial or text the 9-8-8 Lifeline if they or someone they know are in crisis; and (2) print information about the 9-8-8 Lifeline and mental health and substance abuse services on student ID cards issued after July 1, 2025. If an institution does not distribute ID cards to students, information about the 9-8-8 Lifeline must be shared annually in another format. The **New York Law School 9-8-8/Suicide Prevention Policy** describes the New York State 9-8-8 Suicide and Crisis Lifeline and mental health resources available to students, faculty, and staff.

Workplace Violence Prevention Policy

In August 2024, NYLS introduced a **Workplace Violence Prevention Policy**. This Policy prohibits workplace violence, which is defined to include, but not be limited to: intimidation, bullying, threats, physical attacks, property damage, domestic and family violence, and any conduct prohibited by the NYLS Sexual Misconduct Policy and Employee and Student Anti-Discrimination and Anti-Harassment Policies. This includes acts of violence committed by or against Law School employees. Such incidents may also involve students, clients, visitors, or vendors. Prohibited conduct does not encompass lawful acts of self-defense or the defense of others. Conduct that threatens, intimidates, or coerces another employee, student, vendor, or business associate will not be tolerated. NYLS's resources may not be used to threaten, stalk or harass anyone at the workplace or outside the workplace. NYLS treats threats coming from an abusive personal relationship as it does other forms of violence. The Policy also discusses support offered to those affected by violence, how to report violence or threats of violence, and investigative protocols.

Rules for the Maintenance of Public Order

Per the requirements of New York **Education Law Section 6430**, NYLS's **Rules for the Maintenance of Public Order** ("Rules") prohibit, among other things, "any action or situation which recklessly or intentionally endangers mental or physical health" or "involves the forced consumption of liquor or drugs for the purpose of initiation into or affiliation with any organization" (or for any other reason). The Rules apply to every member of our community, including NYLS student organizations, and visitors to campus. The primary purpose of the Rules is to protect the safety and well-being of the members of our community, and to prohibit and/or prevent behavior that not only threatens that health and safety, but which would undermine or disrupt our learning environment and other Law School operations. The Rules also prohibit any damage to Law School property, and unauthorized access to non-public areas of the Law School and to Law School files and records.

Marketing of Credit Cards Strictly Prohibited

Article 129-A, Section 6437 of the New York State Education Law prohibits the marketing of credit cards except within specific guidelines stated by law. The Law School has adopted this guideline as its marketing policy. The open advertising, marketing, or merchandising of credit cards to faculty, students, or employees is prohibited.

Continued on next page

Office of Security and Life Safety

The Office of Security and Life Safety is committed to the safety of each Law School community member and is made up of various employees of NYLS and our contract service provider, Arrow Security. Security is present at the campus 24 hours a day, seven days a week regardless of whether the campus is open or closed. The Office of Security and Life Safety provides Fire Life Safety Directors (FLSDs) who are present between the hours of 7 am and 11 pm, daily, when the campus population meets or exceeds New York City Fire Department (FDNY) requirements. The Security Command Center is in the West Campus building, room 102.2, in the freight lobby that leads to Leonard Street. Sean Frett, the Manager of Security and Life Safety, oversees all aspects of Security and Life Safety at the Law School under the Vice President of Security and Community Affairs, and oversees all training programs as the instructor, including for the state-certified training school and various training courses each security officer receives.

In 2025, the Office of Security and Life Safety responded to various incidents in and around campus to assist those community members who had questions and/or concerns. Additional personnel were assigned accordingly when required at the campus. Twenty-four incident reports were filed, as follows: medical injury or illness, staff/faculty (5); medical injury or illness, student (3); medical injury, visitor (1); medical injury, contract staff/vendor (2); elevator entrapment (3); disorderly person - exterior of building (3); dispute involving contractor vendor employees (1); disruptive visitor on campus (1); assist 26 Federal Plaza with building evacuation - shelter for daycare center (1); petit larceny of staff personal property (1); criminal mischief to campus property (1); fire alarm - false alarm (2); fire alarm - no actual fire - defective HVAC belt. These incidents are not necessarily reportable as "Clery Act Crimes" (see p.14 below), but are included here in the interests of transparency.

The Office of Security and Life Safety is staffed by approximately eleven (11) full-time personnel licensed by the State of New York as Security Officers, under the supervision of the Vice President of Security and Community Affairs. As such, the authority of the Office of Security and Life Safety personnel to reasonably detain individuals suspected of criminal activity on the campus is the same as any property owner or their designee. These security officers are unarmed and do not possess police powers, such as the power to make arrests. They perform patrols, and are stationed at fixed command posts throughout the campus as follows:

- **West Campus Desk: 185 West Broadway,** 24 hours per day, 7 days per week
- **Center Campus Desk: 55 Worth Street,** 7 am to 7 pm Monday to Friday (except holidays)

Mission and Statement

At New York Law School, the security and safety of the campus community and visitors is always our top priority. The Office of Security and Life Safety takes a proactive approach to campus security, safety, and emergency preparedness by providing a broad range of services that meet the needs and expectations of a safe community. Campus safety is a collective and collaborative effort; personal safety is a partnership at NYLS between those whose responsibility it is to develop and enforce policies and procedures, and the community we serve. On every tour, security officers perform interior and exterior patrols at irregular intervals, and document the results.

The Office of Security and Life Safety also conducts risk assessments based upon local and global events that may impact our campus. In addition, the Office evaluates security needs for special events hosted on campus, and adjusts coverage accordingly.

Continued on next page

Cooperative Partners

The Office of Security and Life Safety works closely with the NYPD 1st Precinct and the NYPD Community Affairs Bureau, located close to the Law School at 16 Ericsson Place. On May 15, 2024, NYLS and the NYPD renewed a Memorandum of Understanding (MOU) to investigate criminal offenses involving violent felonies, hate/bias crimes, and/or missing students at the Law School. The Office of Security and Life Safety has partnered with the **Citizen** team to get real-time notification of events happening around the NYLS campus.

The Office of Security and Life Safety also works closely with the local firehouse FDNY Engine 7, Ladder 1, Battalion 1, located nearby at 100 Duane Street, to ensure the NYLS campus is always following applicable laws and regulations. The Office of Security and Life Safety also coordinates on occasion with the U.S. Secret Service, State Department, FBI, and state police officials when dignitaries, government officials, or other high-profile individuals visit our campus.

Investigations

Section 6434 of the State of New York Education Law requires college and university security departments to report violent felony offenses, as defined in subdivision one of Section 70.02 of the New York State Penal Law. Should a violent felony offense occur at, or on the grounds of, a college or university, the local police authority must be promptly contacted. If a violent felony occurs at or on the grounds of the Law School, the most senior security employee on duty will contact the NYPD for assistance and notify the Vice President of Security and Community Affairs. If the situation warrants, emergency medical services personnel will also be notified. The security supervisor will direct other security employees to secure the location where the incident took place to preserve possible evidence until the arrival of the police. All security and Law School employees will assist the NYPD with their investigation in compliance with the State of New York Education Law. The Law School community will be notified of this incident promptly, consistent with our Timely Warning and Emergency Notifications policy (see p. 4). The security officer involved will prepare an incident report which includes the observations of all witnesses. The security officer will submit the report to the security supervisor, who in turn will submit it to the Vice President of Security and Community Affairs and senior Law School executives.

Crime and Fire Records

The Office of Security and Life Safety maintains all records at the Security Command Center, Room W102.2, located in the West Campus Building. All incidents reported to the Office of Security and Life Safety are entered into the daily log and a separate incident report is generated. The Office of Security and Life Safety maintains a Daily Crime Log required by the Clery Act. In all public logs, the victim's or alleged perpetrator's personal information is excluded. Copies of public logs, including the Daily Crime Log, may be inspected by any member of the community during regular business hours, by contacting Dennis DeQuatro, Vice President of Security and Community Affairs, at **dennis.dequatro@nyls.edu** or 212.431.2859. The Daily Crime Log is kept in electronic format, and Mr. DeQuatro, along with two members of his staff, are trained in maintaining it. In the event the electronic version of the Daily Crime Log cannot be accessed due to technical issues, the log can be reconstructed from other records.

Continued on next page

Advisory Committee on Campus Security

The NYLS Advisory Committee on Campus Security is made up of faculty, students, and employees who review current campus security policies and procedures and make recommendations for improvement. The Committee is chaired by a faculty member and the Vice President of Security and Community Affairs acts as a liaison to the Committee. In 2025, the Committee held two meetings to improve safety on the campus, on April 3, 2025, and November 5, 2025.

Emergency Preparedness, Evacuation, and Notifications

The Office of Security and Life Safety continually assesses the operational needs of the community and meets on a bi-weekly basis. Evacuation drills are conducted at the Law School campus on three dates per year: drills are conducted in both the day and evening on each such date. During each evacuation drill, all community members are directed to the primary and secondary assembly areas located on West Broadway and Varick Streets between Leonard and Franklin Streets.

The fire organization and brigade teams, made up of Law School employees, receive training on-campus by the Office of Security and Life Safety before the fall and spring evacuation drills. All members of the Office of Security and Life Safety receive their annual security guard training, and their bi-annual Cardiopulmonary Resuscitation (CPR), and Automated External Defibrillator (AED) training in-house from certified members of the security team. New York Law School is also a New York State certified school for security officers assigned to the NYLS campus.

The Office of Security and Life Safety Emergency conducts notification tests via the NYLS Notify system monthly for key members of that Office, and twice per year for the entire Law School community. The results of such emergency tests are then documented and reviewed by the Vice President of Security and Community Affairs. Any recommendations for changes or improvements following such drills and tests are also documented. Issues impacting operations at the campus are posted on the Law School's emergency web page, **http://emergency.nyls.edu,** and are disseminated to students and staff through mass email or the Notify NYLS system.

The Office of Security and Life Safety will always respond to reports of emergencies or dangerous situations on the Law School campus. Campus security personnel who respond will assess the situation and determine if the event presents a serious threat to the Law School community that requires elevation to the proper authorities; they also will coordinate the response and communications. Any member of the Law School community who is presented with an emergency can dial 911 from the nearest campus phone, which will trigger a notification and response from campus security and notify the NYPD.

Security officers are given guidance and receive training on how to respond to emergencies, including situations that require fire department and/or medical assistance. The officers are required to report all situations that might result in injury to people; loss or damage to personal and Law School property; and all other violations of the law to their supervisor and/or the Vice President of Security and Community Affairs.

Notify NYLS

All community members should keep their current contact information up to date to receive important messages regarding campus operations. All NYLS Staff log onto **https://notifynyls.bbcportal.com/** and students log onto **https://go.nyls.edu.** Notify Emergency Tests to the NYLS community were conducted on March 28, 2025 (Spring) and September 12, 2025 (Fall). Tests for key personnel such as security staff and supervisors are performed on the last Wednesday of each month.

Continued on next page

NYLS Campus Buildings

185 West Broadway

This campus building, also identified as the West Campus building, or Abbey Hall, is currently the main entrance into and exit from the Law School for students. This entrance is open to all members of the Law School community between the hours of 7 am and 11 pm daily. Only authorized and limited visitors are permitted during the operating hours of 7 am to 7 pm. Visitors must produce a valid identification and be escorted by the community member inviting them. The main entrance also serves as the primary Americans with Disabilities Act (ADA) entrance to the campus as there are air-assist doors located on the north portion of the main entrance. Smoking is not permitted at this location. The West Campus building consists of three floors below grade, three of which are in the library and one which houses our auditorium. Above grade, there are six floors, consisting of the main floor; classrooms and the events center on the second floor; classrooms on the third and fourth floors; and classrooms and the cafeteria on the fifth floor, including an exterior dining terrace. The loading dock entrance for deliveries is located at 52 Leonard Street.

55 Worth Street

This campus building, also identified as the Center Campus building, is divided into east and west portions. The Center Campus building serves as the home of the Joe Plumeri Center for Small Business Empowerment, established in 2015. The Center Campus consists of two levels below grade, housing the Student Organization Centers, and five floors above grade, comprised of office space, classrooms, clinic centers, and flex rooms. There is an ADA elevator located in the eastern portion. 55 Worth Street serves as a secondary entrance and exit for NYLS faculty and staff.

57 Worth Street

This campus building, also identified as the East Campus building, houses part of the Plumeri Center and consists mainly of administrative offices for faculty and staff. The main entrance is always closed (the building may be accessed via other campus buildings). The entrance on 234 Church Street serves as the off-street delivery entrance and an additional ADA entrance during normal campus hours. 57 Worth Street is the original Law School building and consists of two levels below grade, one of which houses the Copy Center/Mailroom, and ten levels above grade, consisting of office space, a student clinic, and organization space.

Card Access Permissions

- 185 West Broadway (West campus) turnstiles and ADA door: 24/7 for faculty and staff; 7 am–11 pm for students.
- 55 Worth Street (Center campus) main entrance door: 7 am–7pm, Monday-Friday, except holidays.

*Only authorized NYLS personnel have access to the 234 Freight entrance card readers. Students, in general, are not issued or permitted to have campus keys.

Continued on next page

Disability Access to NYLS Campus Buildings

NYLS is committed to providing access to all members of the community and its visitors. There are various locations in which easy access can be established, as follows:

- 185 West Broadway (West campus): main ADA door (air assisted)
- 57 Worth Street (East campus): 234 Church Street freight area

***Access to 234 Church Street currently requires prior arrangement with the Office of Security and Life Safety.**

There are accessible restrooms available throughout the campus as follows:

- **185 West Broadway** (West campus): all restrooms are ADA accessible.
  (ADA restrooms on the auditorium level, W1, W2, and W5 are air assisted)
- **55 Worth Street** (Center campus): Floors C, 1, C3, C4, and C5 have ADA-accessible restrooms.
  (ADA restroom in the Plumeri Center on the main floor is air assisted)
- **57 Worth Street** (East campus): Floors 2, 4, 5, 8, and 9 have ADA-accessible restrooms.
  (ADA restrooms on E8 are air assisted)

Note: there are no NYLS student organizations with non-campus locations.

Crime Prevention Education and Awareness

Through the Office of Security and Life Safety, the Safety-First program has provided community-wide safety programs and literature. Handouts and postings are always available for students and community members at the literature rack located in the Center Campus building's Plumeri Center, near the Office of Information Technology (OIT) Helpdesk Office; and the Office of Security and Life Safety in the West Campus building, room W102.2. The Safety-First Programs include:

Operation ID

NYLS and NYPD usually coordinate on an annual basis to have NYPD personnel on-site to mark any valuable electronic devices with a special assigned serial number in the event they are lost or stolen and then recovered. Operation ID most recently took place on April 28, 2025.

NYLS Emergency Page General Postings and Tips

NYLS posts general tips on its emergency page advising all community members of activities in and around the New York City Area. See **http://emergency.nyls.edu**.

Annual Harassment Prevention Training

All NYLS community staff were required to complete Harassment Prevention Training, arranged by the NYLS Office of Human Resources, on or before April 18, 2025.

Continued on next page

Emergency Preparedness Training

During August, when our new students receive orientation, the Office of Security and Life Safety participates in a campus program titled "Getting Connected," to familiarize the students with campus operations and emergency preparedness training. The incoming class of 2025/26 received their training during the week of August 18, 2025, and the incoming class of 2026/27 received it during the week of August 17, 2026.

NYPD Shield

As part of the NYPD Shield program, a member of the NYPD Counter Terrorism Bureau typically presents various security seminars and/or literature for the NYLS community, including Emergency Preparedness information.

Reporting Criminal Incidents

Security personnel are on duty 24/7, including holidays. Follow your intuition; do not hesitate to contact employees of the Office of Security and Life Safety if you observe suspicious individuals, activities, and/or situations. A security officer can be found at the below noted locations and numbers:

Security Post Extensions

- West Campus Command Desk: 212.431.2123, Security 24 hours
- Center Campus Command Desk: 212.431.2100, ext. 4755, Security 7 am-7 pm (Monday to Friday) except holidays
- Vice President for Security and Community Affairs: 212.431.2859, **dennis.dequatro@nyls.edu**
- Security Supervisors: **securitysupervisor@nyls.edu**.
- A victim of or witness to a crime may also report any incident immediately to any **Campus Security Authority**, and/or the New York City Police Department (911), or to a Law School administrator or faculty member.

Violent Felony

Clery Act definitions of Primary Criminal Offensives include but are not limited to, degrees/classes of murder and manslaughter, sexual assault, robbery, aggravated assault, burglary, motor vehicle theft, and arson.

See Appendix 1 to this Report for more information.

Hate Crimes

In addition to mandating the reporting of Primary Criminal Offenses (listed above), the Clery Act requires the reporting of offenses designated under the Clery Act as "hate crimes." The Clery Act defines a hate crime as a criminal offense that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. Hate crimes include the primary criminal offenses listed above (except Manslaughter by Negligence) plus: Larceny-Theft; Simple Assault; Intimidation; and Destruction/Damage and Vandalism to Property. The categories of bias that may result in a hate crime designation for purposes of this policy are as follows: race, gender, gender identity or expression, religion, sexual orientation, ethnicity, national origin, and disability. The bias can be expressed through conduct, speech, or expression. A crime does not have to occur for an incident to be labeled as bias, but a bias incident requires a crime to be reportable.

Continued on next page

Should you experience or witness a **hate crime** or incident, you are encouraged to report it promptly to a security officer at either the 185 West Broadway Lobby Desk Post, First Floor, 212.431.2123; the Vice President of Security and Community Affairs, located in Room C537, 212.431.2859; employees in the Office of Student Life, located in Room C532, 212.431.2851; a Campus Security Authority; or one of the Title IX Co-Coordinators (Nina Jody, Room C105, 212.431.2845, or Florence Hutner, Room E412, 212.431.2876), for incidents of gender-related hate crimes.

Individuals witnessing or experiencing a **hate crime** are also strongly encouraged to promptly report the crime to the police. A security officer will advise and assist the affected individual in contacting the NYPD. Law School disciplinary proceedings are conducted independently of all criminal proceedings. They may also occur before, during, or after criminal proceedings.

See Appendix 1 to this Report for more information.

Response to Calls for Emergency Assistance and/or Criminal Incidents

The security officer who receives a call for assistance will ensure the call is responded to, and report this information to their supervisor who in turn, will alert the Vice President of Security and Community Affairs. The security supervisor will dispatch authorized personnel to that location to provide the necessary support and assistance.

Whether the crime is one of physical injury or involves personal property, the security officer or supervisor will advise and assist the affected individual in contacting the NYPD. The security officer will remain at the location pending the arrival of the NYPD. After or following the actions of the NYPD, the supervisor and/or security officer involved will generate an incident report that they will submit to the Vice President of Security and Community Affairs.

The Law School's **Anti-Discrimination and Anti-Harassment Policy Employees, Anti-Discrimination and Anti-Harassment Policy Students, Sexual Misconduct Policy,** and the **Student Code of Conduct and Academic Responsibility** describe examples of unacceptable behavior and possible consequences.

Voluntary Confidential Reporting

Students and staff are encouraged to report all crimes promptly to any Campus Security Authority, Law School administrator, faculty member, and/or directly to the NYPD, when the victim elects to so report or is unable to do so. Reports of criminal incidents for inclusion in this Annual Security Report can also be made to a Campus Security Authority and will be kept confidential by any campus authority subject to the limits of State and Federal Laws, including the reporting requirements of Title IX of the Education Amendments of 1972 ("Title IX").

The Law School's **Campus Security Authorities Policy** discusses the procedures by which community members may report crimes that occur on campus, on non-campus,[1] or on public property reasonably contiguous to the Law School (the Law School's so-called "Clery Geography"). Notably, Campus Security Authorities are obligated to report offenses that are covered by Title IX to one of the NYLS Title IX co-coordinators, even if the impacted person does not wish a report to be made.

---

[1] 34 CFR § 668.46(a) defines "Noncampus building or property," as:

(i) Any building or property owned or controlled by a student organization that is officially recognized by the institution; or

(ii) Any building or property owned or controlled by an institution that is used in direct support of, or in relation to, the institution›s educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.

NYLS has no such "noncampus" property.

"Public property" is defined by 34 CFR § 668.46(a) as "[a]ll public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus."

Continued on next page

Seeking Support and Disciplinary Actions

Students

Victims of hate or bias crimes or other criminal misconduct should seek support from a friend, family member, or an NYLS employee. We strongly encourage victims to contact an employee in the Office of Student Life, located on the Fifth Floor of the "C" campus building, 212.431.2851; or the Title IX Coordinator and Counsel, Nina Jody, Room C105, 212.431.2344; or Title IX Assistant Coordinator, Florence Hutner, Room E412, 212.431.2876, for gender-related hate crimes. If a criminal complaint is filed against a fellow student, it will be submitted to the Law School's Academic Responsibility Committee, the Harassment and Discrimination Review Board, or the Title IX Board, as applicable. The complainant and the accused will be permitted to have an attorney or other advisor present.

Student complaints of hate or bias crimes, or other crimes of violence by employees of the Law School, should be filed with the Office of Security and Safety, located at 185 West Broadway, Room W102.2 or 212.431.2123. Victims of crimes and violence also are strongly encouraged to promptly report the incident to the NYPD, by calling 911.

Faculty and Staff

Faculty and staff victims of crimes also should seek support from a friend, family member, or employee. We strongly encourage victims to contact an employee in the Office of Human Resources, located on the Sixth Floor of 57 Worth Street, "E" campus building, or 212.431.2131; the Title IX Coordinator and Counsel, Nina Jody, Room C105, 212.431.2344; or Title IX Assistant Coordinator, Florence Hutner, Room E412, 212.431.2876, for gender-related hate crimes.

If a faculty member or employee engages in any prohibited conduct, the consequences of that action will be in keeping with existing guidelines governing the resolution of cases of unprofessional conduct, up to and including dismissal. Employee complaints of crimes of violence against fellow members of the Law School community should be filed with the Office of Security and Life Safety, located at 185 West Broadway, Room W102.2, or 212.431.2123. Victims of crimes and violence are strongly encouraged to promptly report the incident to the NYPD. Law School disciplinary proceedings are independent of a criminal or civil proceeding, and may also occur before, during, or after such independent proceedings.

Maintenance of Criminal Incident Files

The Vice President of Security and Community Affairs and the Office of Security and Life Safety maintain the files of all reported criminal incidents. All reports created and maintained by the Office of Security and Life Safety, which meets the definition of a law enforcement unit, are not education records and as such are not subject to protection from disclosure under the Family Educational Rights and Privacy Act (FERPA). Although records of reported crimes date back to February 1, 1987, the minimum period for record retention is seven (7) years.

Required Disclosures Regarding Crimes of Violence or Non-Forcible Sex Offenses

New York Law School is required to provide both the accused and the accuser with simultaneous written notification of any result of any institutional disciplinary proceeding that arises from an allegation of dating violence, domestic violence, sexual assault, or stalking. In these cases, a victim does not need to make a written request. New York Law School also will, upon written request, disclose to the alleged victim of a crime of violence (as that term is defined in section 16

Continued on next page

of title 18, United States Code), or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by the Law School against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased because of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

Crime Victim Hotlines

- Anti-Violence Project: 212.714.1184, **http://www.avp.org**
  24/7 confidential bilingual victim's hotline serving NY LGBTQ and HIV communities
- NYPD Victims Treatment Center: 646.610.7273, **https://www.cvtcnyc.org/**
  Saint Luke's/Roosevelt Hospital sex crime hotline
- NYS Crime Victims Board: **https://ovs.ny.gov/**
  Local Victim Assistance Program
- NYS Coalition Against Sexual Assault: 518.482.4248, **http://nyscasa.org**
  Information and Prevention Resource
- Safe Horizon Hotlines: **http://safehorizon.org/**
  - Crime Victims: 866.689.4357
  - Domestic Violence: 800.621.4673
  - Rape, Sexual Assault, and Incest: 212.227.3000
- NYPD 1st Precinct: 212.334.0611/911
  http://www1.nyc.gov/site/nypd/bureaus/patrol/precincts/1st-precinct.page

Missing Student Procedures

The federal Higher Education Act missing student notification regulation applies only to students who reside in campus housing, which is not applicable to NYLS because the Law School no longer maintains student housing; all student housing is arranged by the students directly. Nevertheless, any student, faculty, or other staff members who have reason to believe that a student has been missing from the Law School campus, should contact the Vice President of Security and Community Affairs at 212.431.2859, and/or a Security Supervisor at 212.431.2123 or via email at **security@nyls.edu**. Upon being notified of a missing student, the Vice President of Security and Community Affairs or Security Supervisor will request the name and related information for the missing student's designated emergency contact (as provided in the student's NYLS application) and may provide the same to local law enforcement personnel to further an investigation. The Vice President of Security and Community Affairs shall contact the Office of Student Life to confirm the student's emergency and contact information. Emergency contact information shall be kept confidential beyond those Law School officials who may need to utilize it. Regardless of whether the student has identified a contact person, the Law School promptly shall inform the NYPD of a report of a missing student regardless of the student's residence, unless the local law enforcement agency was the entity that determined that the student is missing.

Upon being notified of a missing student, the Vice President of Security and Community Affairs or a Security Supervisor will contact the Assistant Dean of Student Life and Dean of Students, the Registrar, and employees in the Office of Academic

Continued on next page

Planning and Career Development, to seek their assistance in determining whether the student has been attending classes. If the student has not attended their assigned classes, the Vice President of Security and Community Affairs or a Security Supervisor will notify the Commanding Officer at the local NYPD precinct that encompasses the neighborhood where the student resides (or local law enforcement if the student resides outside of the city). At no time will personal information on file with the Law School be released if a student has completed a form requesting it remain confidential.

NYLS Drug and Alcohol Policies

New York Law School is committed to a learning environment free from the deleterious influences of drugs and alcohol. While recognizing that students and employees aged 21 and older are legally permitted to consume alcoholic beverages, the Law School requires them to do so responsibly and in accordance with applicable federal, state, and local laws, as well as the **NYLS Drug and Alcohol Policy**. Although consumption of marijuana is legal under New York State Law, the smoking of marijuana (including vaping) is prohibited on the NYLS campus. In accordance with federal and state laws, no one may manufacture, possess, use, dispense, or distribute any illegal drug on New York Law School premises or at official Law School functions off premises. Any instances of illegal drug manufacture, possession, use, dispensing, or distribution will be referred to the appropriate law enforcement authorities for possible prosecution. If a student is convicted of a drug-related offense, a permanent notation will be placed in the student's file and will be forwarded to the appropriate Bar Certification Committee. Students convicted of possession, use or distribution of illegal drugs also may be subject to disciplinary action by the Academic Responsibility Committee. These actions include expulsion, suspension, reprimand, and permanent notation on the record of the violator. If a member of the faculty or a staff member violates this policy or is convicted of a drug-related offense, the Law School reserves the right to take appropriate action, which may include personnel action or mandatory participation in a drug abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health, law enforcement or other appropriate agency.

No person under 21 years of age may be served an alcoholic beverage while on New York Law School premises or at official Law School functions off-premises. Students found to be in violation of this Policy will be referred to the Academic Responsibility Committee for disciplinary action in accordance with that committee's procedures. These actions include but are not limited to one or more of the following: expulsion, suspension, reprimand, and permanent notation on the record of the violator, as well as law enforcement action. Student organizations found to have been involved in violation of this Policy are also subject to appropriate sanctions, such as rescission of permission to operate on campus, loss of funding, and loss of office space. The consumption of alcohol by employees while on Law School business or in a manner that affects job performance or may adversely reflect on the reputation of the Law School is not acceptable. Employees are expected to report to and remain at work in a condition to perform assigned duties free from the effects of alcohol and drugs.

New York Law School offers a Student Assistance Program (SAP) through Aetna. On a 24 hour per day, 7 day per week basis, the SAP provides free and confidential information, assessment, crisis intervention, short-term counseling and referral for a range of problems that may include substance abuse, mental health issues, family matters, financial concerns, child and eldercare or personal growth transition. This service is available to all students and members of their immediate families. Students are notified about the SAP during their "First Week" Orientation program, and via email and newsletters. Information about the services provided is posted on the student portal. See **https://www.resourcesforliving.com/login**. Students may also email **AskSAP@Aetna.com**, or visit **www.aetnasap.com** and enter the school ID: NYLAW-Password: NYLAW. Additional programming is provided for incoming students to reinforce New York Law School's policies regarding the use of drugs and alcohol and promote student wellness.

The Law School also works with the New York City Lawyer Assistance Program (LAP), which provides professional

Continued on next page

programs geared towards identifying signs of alcohol and substance abuse in law students and the legal profession, along with how and when to make referrals for professional assistance, stress management for law students, and ethical concerns for members of the legal profession related to substance abuse. Brochures for the LAP are posted on the student portal and readily available in all Student Services offices. A copy of the LAP brochure may be accessed at **https://documents.nycbar.org/files/lap_brochure.pdf**.

Further, the Law School has on staff a Licensed Clinical Mental Health Counselor, Isabella Poloes, **isabella.poloes@nyls.edu**. NYLS also anticipates continuing its partnership with Sophia Soloway, a licensed clinical social worker, through at least the end of 2026. She may be reached at **sophia.soloway@nyls.edu**. Both Ms. Poloes and Ms. Soloway are available to counsel students facing, among other things, challenges relating to substance use. These services are free of charge.

NYLS Policy Related to Weapons

New York State Law

In accordance with New York State Penal Law, Article 265.01, it is a crime in New York State to possess a rifle, shotgun, air gun (including BB guns), spring gun, or other firearm when in the building or on the grounds of any school, college, or university, even if you have a valid New York State firearm permit. It is also a crime to possess karate sticks (nunchaku), daggers, switchblades, locking butterfly knives, stun guns, and any other instruments that are deemed unlawful by New York State Penal Law Article 10.

Law School Policy

In accordance with the **NYLS Weapons Possession Policy**, it is a violation to possess, carry, or use firearms, including rifles, shotguns, and other assault and automatic weapons, ammunition, explosive devices of any description, other dangerous weapons, instruments, or substances, on owned or leased New York Law School property, or at any event sponsored by New York Law School on any other property. This policy applies to weapons carried about the person or stored within any parked vehicle on Law School property. "Dangerous weapons" also include harmless instruments that are designed to look like real weapons or may be used by a person to cause fear and/or produce bodily harm. New York Law School reserves the right to further determine the definition of a weapon and may prohibit other devices on an individual basis.

Continued on next page

Notice of Non-Discrimination

NYLS is committed to building an inclusive community and welcomes all individuals. In compliance with federal, state, and local laws, New York Law School does not discriminate on the basis of race, color, religion, creed, national or ethnic origin, sex (including stereotypes), sexual orientation, gender (including gender identity), age, disability, pregnancy, marital status, parental status, or any other legally protected characteristic in the administration of any of its educational programs and activities. The Law School prohibits discrimination, harassment, or retaliation on these bases and takes steps to ensure that students, employees, and third parties are not subject to a hostile environment in NYLS programs or activities.

Please refer to the following Law School institutional plans and policies for additional information:

- **NYLS Institutional Diversity Plan**
- **Anti-Discrimination and Anti-Harassment Policy (Employee)**
- **Anti-Discrimination and Anti-Harassment Policy (Student)**
- **NYLS Sexual Misconduct Policy**
- **Handbook for Students with Disabilities**

NYLS has designated the following persons as Title IX co-coordinators, to handle inquiries and complaints from students, faculty, and staff regarding discrimination or harassment based on sex, gender (including gender identity and gender expression), pregnancy, sexual orientation, marital or parental status, or domestic violence victim status, under Title IX of the Education Amendments of 1972 and New York law:

Nina Jody '83; Room C105; 212.431.2344; **nina.jody@nyls.edu**

Florence Hutner; Room E412; 212.431.2876; **florence.hutner@nyls.edu**

Concerns also may be directed to any member of the Title IX Board, and/or to the Department of Education, Office of Civil Rights ("OCR"), as identified in the NYLS Sexual Misconduct Policy, discussed below. NYLS has designated the following persons to handle inquiries and complaints regarding all other forms of discrimination and harassment:

Jennifer Khuu; Vice President of Human Resources; EO Coordinator; Room E612; 212.431.2816; **jennifer.khuu@nyls.edu**

Florence Hutner; Senior Advisor, Office of Academic Affairs; EO Coordinator; Room E412; 212.431.2876; **florence.hutner@nyls.edu**

The following persons are members of the NYLS Title IX Board:

Claudine Caracciolo
Shahrokh Falati
Victoria Eastus
Amy Rowland

Continued on next page

Sexual Misconduct Policy

Scope of Policy

The **NYLS Sexual Misconduct Policy** specifically prohibits sex-based misconduct, harassment, and violence in accordance with the definitions under Title IX, the Clery Act, relevant provisions of the Violence Against Women Act, as reauthorized in 2013 and 2022 ("VAWA"), and New York Education Law Article 129-B, each of which require that NYLS take specific steps to prohibit and address sex and gender-based harassment and misconduct, remedy its effects, and prevent its recurrence. In the event of conflict between State law, FERPA, or Title IX, NYLS acknowledges that it will comply with Title IX. Title IX and its associated regulations do not override any legal right of a parent, guardian, or other authorized legal representative to act on behalf of a complainant, respondent or other person.

NYLS has enacted its Sexual Misconduct Policy (the "Policy") to reflect and maintain its institutional values and community expectations, to provide fair and equitable procedures for determining when the Policy has been violated, and to provide recourse for individuals in response to violations of the Policy.

All other forms of discrimination, harassment, and retaliation based on other Protected Characteristics, and some forms of discrimination, harassment, and retaliation based on sex, are addressed by NYLS's Employee or Student Anti-Discrimination and Anti-Harassment Policy. When a report is made that alleges conduct covered under the Sexual Misconduct Policy, and conduct covered under the Employee or Student Anti-Discrimination and Anti-Harassment Policy, the Law School will work with each policy to address the complaint and will coordinate the investigation and resolution efforts. Questions about which policy governs a particular situation should be referred to the NYLS Title IX Co-Coordinators.

The Law School has designated Nina Jody '83 as NYLS's Title IX Coordinator and Counsel and Florence Hutner as Title IX Assistant Coordinator (together, "Co-Coordinators"). The Title IX Co-Coordinators and Counsel can be contacted by telephone, email, or in person during regular office hours:

Nina Jody '83
Title IX Coordinator and Counsel
New York Law School
185 West Broadway, Room C105
New York, NY 10013
T: 212.431.2344
E: **nina.jody@nyls.edu**

Florence Hutner
Senior Advisor, Office of Academic Affairs
Title IX Assistant Coordinator
New York Law School
185 West Broadway, Room E412
New York, NY 10013
T: 212.431.2876
E: **florence.hutner@nyls.edu**

Continued on next page

Conduct Covered

The Policy prohibits all forms of Sex-Based Misconduct and violence in accordance with the definitions under Title IX, the Clery Act, relevant provisions of VAWA, and New York Education Law Article 129-B (collectively, "Sex-Biased Misconduct"). Sex-Based Misconduct may include, but is not limited to:

- Discrimination on the basis of sex, including on the basis of pregnancy (or related conditions), parental, family, or marital status
- Domestic violence or dating violence
- Non-consensual sexual contact
- Quid pro quo sexual harassment
- Sexual assault
- Sexual exploitation
- Stalking

Sex-Based Misconduct can occur between supervisors/employees, co-workers, students/employees, students/students, and people of the same or a different sex. To operate educational programs and activities free from prohibited sex discrimination at all times, NYLS will take prompt and effective action to end any prohibited sex discrimination for which it has actual notice or knowledge, prevent its recurrence, and remedy its effects. The Policy also defines prohibited relationships of a sexual or intimate nature between individuals where one individual has power over another. Sex-Based Misconduct undermines the character and purpose of NYLS and will not be tolerated. The Policy also prohibits retaliation against an individual based in whole, or in part, on any individual's exercise of the individual's rights under the Policy; participation in an investigation into allegations of any of the conduct covered in the Policy; opposition to any conduct covered in the Policy; or encouragement of others to exercise their rights under the Policy; such retaliation is absolutely prohibited by NYLS and under federal, state and local law.

Persons Covered

The Policy applies to any individuals regularly or temporarily employed, conducting business, studying, living, visiting, or having any official capacity with NYLS or on its property ("Community Members"). Community Members include:

- Adjunct, emeritus and visiting faculty
- Administrators
- Admitted Students
- Alumni
- Applicants
- Contractors
- Full-time faculty
- Senior Fellows
- Staff
- Students
- Student employees

Continued on next page

- Supervising attorneys for NYLS clinical and other experiential learning programs
- Trustees
- Vendors
- Visitors/guests
- Volunteers

NYLS may be limited in what actions it may take when investigating or responding to a report if an accused person is not known to NYLS, not affiliated with NYLS, or is no longer affiliated with NYLS at the time that the report of a Sex-Based Misconduct is made. In such cases, NYLS will, to the best of its ability, conduct an inquiry, take steps to prevent the recurrence of such conduct to any Community Members, and remedy the effects, if appropriate. If one of the parties involved in a report is not affiliated with NYLS (i.e., if a student is participating in a joint program with another school), NYLS may cooperate with that institution or organization to complete the investigation.

Locations Covered

The Policy applies to Sex-Based Misconduct that occurs:

- On campus, including conduct which occurs on property owned or controlled by the Law School.
- During education programs or activities (whether on-site or off-site), in the United States, including, but not limited to, NYLS-sponsored clinical or internship programs, and externship programs offered for academic credit. For the purpose of the Policy, "education program or activity" is defined broadly and includes locations, event, or circumstances over which NYLS exercised substantial control over both the respondent and the context in which the Sex-Based Misconduct occurred.
- In some circumstances, on social media and other online platforms, regardless of whether the misconduct is initiated on campus.
- In addition, consistent with the requirements of VAWA, the Policy addresses sexual violence, domestic violence, dating violence, and stalking, and this Report reports incidences of such crimes that occur within the Law School's Clery Geography (see tables at pp. 39–41). Further, Article 129-b of the New York State Education Law requires institutions of higher education to provide recourse through school processes to victims of domestic violence, dating violence, stalking, and sexual assault. These processes are described in the Policy, and in this Report in the sections below.

Programs to Prevent Dating Violence, Domestic Violence, Sexual Assault, and Stalking

As noted, NYLS's Sexual Misconduct Policy prohibits, among other things, dating violence, domestic violence, sexual assault, and stalking. The definitions of these crimes under New York law, along with the definition of Consent in reference to sexual activity, and related definitions, are set forth in Appendix 2 to this Report.

- **NYLS's Educational Programs and Campaigns to Promote the Awareness of Dating Violence, Domestic Violence, Sexual Assault, and Stalking**
  - The Title IX training given annually to new students by the NYLS Title IX Co-Coordinators, covers, among other topics, the definitions of sexual assault, affirmative consent, domestic and dating violence, and stalking. The Title IX training also describes: (a) how the NYLS Title IX office can assist victims of sexual misconduct; (b) emergency

Continued on next page

reporting options; (c) free medical and counseling services available for victims of sexual assault; (d) interim measures available for those making a complaint under Title IX; (e) the NYLS Students' Bill of Rights, as required under § 6443 of the New York State Education Law; (f) the NYLS Title IX Complaint and Resolution Process; (g) the prohibition on retaliation against complainants; (h) sanctions for any student found to have violated the Sexual Misconduct Policy; (i) how to make a formal complaint under Title IX; (j) confidentiality procedures; (k) privacy protections; (l) due process rights for complainants and respondents; and (m) provisions for anonymous reporting. A link to the Title IX training PowerPoint may be found on the NYLS Portal, under "Student Resources > Title IX Resources." The Faculty Resources and Staff Resources pages link to Title IX Resources as well. All NYLS faculty and staff were offered Title IX training in 2025 through the Catharsis "Report=Support" platform. Student leaders completed Title IX training by attesting to watching a video of the training. All first-year students received Title IX training during on-campus orientation, during the week of August 18, 2025. Incoming first-year students received the training during on-campus orientation during the week of August 17, 2026.

– NYLS also presents annual training on Bystander Intervention, in collaboration with the NYC Commission on Human Rights. This training discusses, among other things, the nature and prevalence of sexual violence, and describes various strategies that bystanders (witnesses to sexual violence) may safely adopt before, during or after an incident, in an effort to contribute to a safer and more equitable environment for all community members. All NYLS faculty and staff were offered Bystander Intervention Training on March 18, March 20, or April 2, 2025, via Zoom. All first-year students received in-person Bystander Intervention Training during the Spring 2025 semester. Student leaders received similar training during the Fall 2025 semester, along with mandated Title IX training.

– In recognition of Sexual Assault Awareness Month, on April 24, 2025, the NYLS Title IX office held a tabling event on Denim Day. Denim Day was inspired by the outrage caused thirty years ago by a court decision finding that a victim could not have been raped because she must have helped to remove the tight jeans she was wearing when she was assaulted. A representative of NYLS's partner at Wyckoff Hospital's Violence Intervention and Treatment Program discussed issues surrounding prevention of sexual assault and the significance of Denim Day, and provided information on the hospital's volunteer program to become an advocate for survivors of sexual violence in the Wyckoff Hospital Emergency Room. Community members were invited to wear denim in solidarity, stop by to say hello, to help counter victim blaming and misconceptions about sexual assault, and to learn strategies to keep our communities safe. The Title IX Office 2025 also sponsored a tabling event on October 28, 2025 for Domestic Violence Awareness Month, in collaboration with Presbyterian Hospital Domestic and Other Violence Emergencies Program (DOVE).

- **Procedures Victims Should Follow if a Crime of Dating Violence, Domestic Violence, Sexual Assault, or Stalking Has Occurred**

  – **Preserving Evidence**: The NYLS Sexual Misconduct Policy, at p. 30, "Safety First," describes the importance of victims of sexual assault preserving evidence. If you have been assaulted, consider visiting an emergency room (where you will likely find staff such as Sexual Assault Nurse Examiners, who are trained in working with individuals who experience sexual violence). Medical professionals can help you check for injuries, be screened and educated regarding sexually transmitted infections or pregnancy, and to collect evidence. Evidence collection in NYC does not require you to file a police report, but preserving evidence allows you options. For the purposes of evidence collection:

    - Avoid bathing, showering, washing your hands or face, changing clothes, eating, drinking, or brushing teeth prior to a medical exam, if possible.
    - Do not wash or launder clothes, bed linens, or any other items that may contain bodily fluids, DNA, hair, etc. of the perpetrator. It is always best not to touch these items; if you plan to report the incident to the police, alert them

Continued on next page

to the items when they arrive. If you are undecided on reporting the incident and you must touch these items, if possible, use gloves before handling the items. Save clothing or items involved in a paper bag (not plastic).

- Preserve electronic evidence such as texts, emails, social media messages, ride-share app communications, or call logs.

The medical treatment resources listed below can provide treatment for injuries and for potential exposure to sexually transmitted diseases. They also provide emergency contraception and other health services. They can assist in preserving evidence and documenting any injuries, including by helping find a Sexual Assault Nurse Examiner, who is specially trained to collect evidence.

– **How and to Whom the Alleged Offense Should Be Reported**: As described in the Sexual Misconduct Policy, at pp. 6-9, NYLS strongly encourages all individuals who believe they may be victims of sexual exploitation, stalking, domestic/sexual/dating violence, and/or sexual assault (as defined in the Sexual Misconduct Policy, Section 13) to seek assistance from a medical provider and/or law enforcement immediately after an incident. NYLS also strongly encourages all such individuals to make a report of Sex-Based Misconduct to both NYLS and to local law enforcement, although neither is required. These reporting options are not mutually exclusive. Both internal and external reports may be made simultaneously. The procedures under the Sexual Misconduct Policy may run concurrently with any criminal justice investigation and will only be subject to temporary delays at the specific request of law enforcement.

– NYLS provides a Notice of Rights and Resources to those who report an incident involving dating violence, domestic violence, sexual assault, or stalking (DVSAS). This Notice, which summarizes information about, among other things, medical and counselling resources, preservation of evidence, and supportive measures, also is available on the NYLS website at **https://www.nyls.edu/about/policies-and-reports/**.

A. Emergency Reporting Options

If an individual has experienced sexual violence, their first priority should be to get to a place of safety and dial 911. They should also consider seeking any necessary medical attention as soon as possible. Sex-Based Misconduct that violates the Sexual Misconduct Policy may also violate New York State or other applicable laws (see Sexual Misconduct Policy, Appendix C). Individuals can make a report to law enforcement at any time, and doing so does not preclude the individual from also making a report to NYLS. The best option to ensure the preservation of evidence and the timely investigation of concerns by local authorities is by making a prompt report to the police.

If requested, the Title IX Co-Coordinators can assist an individual with filing a police report, ensuring access to a sexual assault forensic examination, obtaining an Order of Protection or equivalent restraining order, such as a "no contact order," and contacting and assisting local law enforcement if an Order of Protection is violated. Nothing in the Sexual Misconduct Policy shall prohibit NYLS from initiating its own report to the police.

Continued on next page

NYPD Emergency: 911

NYPD Non-Emergency:

1st Precinct (Near Campus)
T: 212.334.0611

Rape Hotline
T: 212.267.7273

Nearest Hospital:

New York Presbyterian Lower Manhattan Hospital
69 Gold Street (Emergency room; between Beekman Street and Spruce Street)
170 William Street
New York, NY 10038
T: 212.312.5070
T: 212.312.5094
T: 212.312.5000

Other Nearby Hospitals With 24-hour ERs Include:

NYC Health + Hospitals/Bellevue
462 1st Ave,
New York, NY 10016
T: 212.562.4141

NYU Langone, Ronald O. Perelman Center for Emergency Services
570 1st Avenue,
New York, NY 10016
T: 212.263.5550

NYU Cobble Hill, Joseph S. & Diane H. Steinberg Ambulatory Care Center
70 Atlantic Avenue,
Brooklyn, NY 11201
T: 646.754.7900

Wyckoff Heights Medical Center
374 Stockholm St,
Brooklyn, NY, 11237
T: 718.963.7272

Campus Security Desk
Law School Entrance, 185 West Broadway
T: 212.431.2123

On-Campus Reporting Options

Any Community Member who wishes to report Sex-Based Misconduct ("Complainant") is encouraged to report directly to the Title IX Co-Coordinators, a member of the Title IX Board (see pp.21-22 above), Campus Security, or another Institution Representative (see below). Reports may be made in person, in writing, by mail.

Continued on next page

Any inquiries concerning the Law School's application of Title IX and its implementing regulations may be referred to the Title IX Co-Coordinators, and/or to the Department of Education, Office of Civil Rights ("OCR"):

U.S. Department of Education, Office of Civil Rights
26 Federal Plaza
Suite 31-100
New York, NY 10278
T: 646.428.3800
E: OCR.NewYork@ed.gov

Campus Security: 212.431.2123

Any Institution Representative: Any faculty member, administrator or staff member, or NYLS security officer is an Institution Representative. See Sexual Misconduct Policy, Section 13. If a report of Sex-Based Misconduct is made to Campus Security or an Institution Representative, that individual is required to inform the Title IX Co-Coordinators of the report. This is true even if the complainant reports the Sex-Based Misconduct in confidence and requests confidentiality. See Sexual Misconduct Policy, Section 4.C, Duty to Report.

If the accused individual is an employee of NYLS, individuals may report Sex-Based Misconduct to:

NYLS Human Resources
185 West Broadway, Office E610
T: 212.431.2131
E: **HumanResources@nyls.edu**

New York State law requires employers to adopt a sexual harassment prevention policy that includes a complaint form for persons to report alleged incidents of sexual harassment. If you believe that you have been subject to sexual harassment, or you have witnessed behavior that may violate the Sexual Misconduct Policy, you may also complete the Sexual Harassment Complaint Form and submit it to the Title IX Co-Coordinators either in person or via email. Blank Sexual Harassment Complaint Forms can be found in the Office of Human Resources. If you are reporting more than one incident, please use a separate form for each incident. If the space provided below is insufficient, please staple additional pieces of paper to the form.

None of the above-referenced individuals can guarantee strict confidentiality; they will, however, maintain the individual's privacy to the greatest extent possible. The information an individual provides to a non-confidential resource will be relayed only as necessary for the Title IX Co-Coordinators to investigate and/or seek a resolution. See Sexual Misconduct Policy, Section 4.D, Confidential and Anonymous Reporting Options.

B. Duty to Report

All employees of NYLS who are considered to be Institution Representatives and who have actual knowledge of conduct that violates the Sexual Misconduct Policy **must** notify a Title IX Co-Coordinator.

Although NYLS employees cannot guarantee confidentiality, they must maintain privacy to the greatest extent possible, and will only relay information to the Title IX Co-Coordinators as necessary to permit an investigation and/or seek a resolution. NYLS students – including student employees – are highly encouraged to report conduct which might be a violation of the Sexual Misconduct Policy to the Title IX Co-Coordinators, but do not have a duty under the policy to do so.

Continued on next page

Failure to immediately notify the Title IX Co-Coordinators of conduct which may violate the Sexual Misconduct Policy may impede the ability of the investigators to conduct an impartial, timely, and thorough review of the complaint and inhibit NYLS's ability to adhere to its obligation under the law. In addition to being subject to discipline if they engaged in Sex-Based Misconduct, NYLS will enforce sanctions, up to and including termination of employment, against employees who fail to report actual or potential violations of the Sexual Misconduct Policy about which they had knowledge, who knowingly allow prohibited behavior to continue, or who engage in any retaliatory behavior.

C. Confidential and Anonymous Reporting

1. Confidential Reporting

Medical service providers and counselors, who serve the Law School in a privileged professional capacity, are not bound by the requirement to inform the Title IX Co-Coordinators of a report of Sex-Based Misconduct. Information shared with these individuals is confidential, except as required by law. The following resources are made available by the Law School for confidential reporting:

- **NYLS students** who desire strict confidentiality may contact one of the professional counselors at Aetna Student Assistance Program (SAP). Call 877.351.7889, email AskSAP@Aetna.com, or visit www.aetnasap.com and enter the school ID: NYLAW and your own password. Aetna provides off-site confidential counseling services to NYLS students.

- **Mount Sinai Beth Israel (MSBI)** is prepared to provide free medical services to NYLS students who have experienced sexual assault or intimate partner violence. MSBI Victim Services Program offers: referrals to SAFE-certified Mount Sinai Health System and other NYC hospitals for advocate accompaniment and emergency medical care, individual trauma-focused therapy, crisis intervention and advocacy via confidential helpline, Office of Victim Services (OVS) compensation assistance (for medical costs, therapy, lost wages, etc.), assistance with safety planning, orders of protection, and shelter/housing referrals, criminal justice information and advocacy. Individuals can call the confidential helpline Monday through Friday, 9:00 am to 5:00 pm, at 212.420.4516, or email VS@mountsinai.org or call Chloe Horowitz, LCSW, Enough is Enough Coordinator, 646.398.3171, or email Chloe.horowitz@mountsinai.org.

- **New York Presbyterian** Weill Cornell provides free, confidential medical services to NYLS students who have experienced intimate partner/dating violence, sexual assault, harassment, stalking or family violence as well as free short-term trauma-based counseling, forensic, and other services. Their Emergency Room is located at 525 East 68th Street, between York Avenue and the East River and offers 24/7 emergency care and support. You can contact the Domestic and Other Violence Emergencies (DOVE) Program at 212.305.9060, or email at Dove@nyp.org. Individuals may also contact Ariana Montenegro, LMSW by email: ZTL9002@nyp.org or Sajada Bhuiyan, LMSW, by email: gix9003@nyp.org, Enough is Enough Coordinators, or call 929.746.1211.

- **Wyckoff Heights Medical Center, Violence Intervention and Treatment Program** is prepared to offer medical services to NYLS students and faculty members who have been the victims of sexual assault, domestic violence, and/or other related crimes. The program provides 24-hour emergency care that includes but is not limited to sexual assault forensic examinations, confidential crises intervention, counseling, referrals, and access to a Violence Intervention and Treatment Program Advocate to support the students and/or faculty members. Wyckoff Hospital is located at 374 Stockholm Street, Brooklyn, NY 11237. During business hours the Violence Intervention and Treatment Program can be contacted by phone at 718.963.7788 or contact Havann Brown, LMHC, Program Manager at 718.906.3846, or email HABrown@wyckoffhospital.org.

Continued on next page

- **Mental Health Services and Resources:** New York Law School has on staff a Licensed Clinical Mental Health Counselor, Isabella Poloes, LCMHC. NYLS also anticipates continuing its partnership with Sophia Soloway, a licensed clinical social worker, through at least the end of 2026. She may be reached at sophia.soloway@nyls.edu. Ms. Poloes and Ms. Soloway are available to offer short-term counseling. This free and confidential service is offered by NYLS and does not require insurance. To make an appointment, contact Ms. Poloes at isabella.poloes@nyls.edu, or Ms. Soloway at sophia.soloway@nyls.edu.

- NYLS employees who desire strict confidentiality may contact one of the counselors at Espyr, available 24 hours a day, 7 days a week via phone at 866.570.3478 or at care.espyr.com (Password: COADV). Free counseling support is available for stress, marital and family problems, job related concerns, life transitions, work-life challenges, emotional issues, and other concerns. Employees have immediate access to counselors for in-the-moment support and guidance. Espyr offers up to six free sessions for assessment, short-term counseling, and referral. Telephonic, video, and in-person options are available. Espyr provides off-site, confidential counseling services to employees, their spouse/domestic partner, and dependents.

- Employees and their dependents also have access to digital cognitive-based therapy, a chat feature with an AI-based chatbot named Tess. Tess is a mental health chatbot that can coach users through a variety of stress or mental health situations by having text message conversations – similar to texting with a friend or coach. Just send a text to Tess: 442.245.8065; when prompted, reference "CoAdvantage" as the employer. Tess is built by clinical psychologists using real conversations to deliver proven cognitive-based therapy when a counselor isn't needed or is unavailable.

- Some additional resources that may be consulted by NYLS students or employees who desire strict confidentiality are included in Appendix B to the Sexual Misconduct Policy.

- NYLS visitors and other individuals who desire strict confidentiality may contact one of the resources described in Appendix B to the Sexual Misconduct Policy, other than the Student Assistance Program and Employee Assistance Program.

2. Anonymous Reporting

Anonymous reports may be made to Title IX Co-Coordinators per the information provided above. Individuals leaving an anonymous report should be aware that failure to disclose identifying information about the accused party, the victim of the Sex-Based Misconduct, or the facts and circumstances regarding the Sex-Based Misconduct severely limits the Law School's ability to respond and remedy the effects of the misconduct. Anonymous reports that provide enough information to constitute a criminal offense will be reported to Campus Security, less any identifying information regarding the complainant, for purposes of inclusion in this Annual Security Report and to assess for purposes of sending out a Timely Warning under the Clery Act.

- **Protection of Confidentiality**

  – NYLS will complete publicly available recordkeeping, including Clery Act reporting and disclosures, without the inclusion of personally identifying information about the victim, as defined in section 40002(a)(20) of the Violence Against Women Act of 1994 (42 U.S.C. 13925(a)(20)); and

  – NYLS will maintain as confidential any accommodations or protective measures provided to the victim, to the extent that maintaining such confidentiality would not impair the ability of the institution to provide the accommodations or protective measures.

- As noted above, the Sexual Misconduct Policy provides written notification to students and employees about existing counseling, health, mental health, legal, and victim advocacy services. The Law School will also provide written

Continued on next page

information to students and employees, as needed, regarding visa and immigration assistance, student financial aid, and other services available for victims, both within the institution and in the community.

- In the Sexual Misconduct Policy, at p. 12, NYLS provides written notification to victims about options for, available assistance in, and how to request changes to academic, living, transportation, and working situations and other protective measures pending resolution of a formal Title IX complaint. NYLS will make such accommodations or provide such protective measures if the victim requests them and if they are reasonably available, regardless of whether the victim chooses to report the crime to campus security or local law enforcement. These measures are discussed in further detail in Appendix 4 hereto.

- The procedures for institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, or stalking, are described in Appendix 4 to this Report.

- When a student or employee reports to NYLS that the student or employee has been a victim of dating violence, domestic violence, sexual assault, or stalking, whether the offense occurred on or off campus, NYLS will provide the student or employee a written explanation of the student's or employee's rights and options, as described herein above.

To view the complete Sexual Misconduct Policy, go to **https://www.nyls.edu/sexual-misconduct-policy**. As part of the Sexual Misconduct Policy, you can also view the following:

- Student Bill of Rights - Appendix A on page 29
- List of Resources for Support - Appendix B on page 30
- New York State Criminal Definitions – Appendix C on page 33

New York City Hospitals with Free of Charge SAFE (Sexual Assault Forensic Examiner) Centers

- **New York-Presbyterian – Columbia**: 622 W. 168th St.
- **New York-Presbyterian- The Allen Pavilion**: 5141 Broadway at W. 220th St.
- **Wyckoff Hospital**: 374 Stockholm St., Brooklyn NY
- **Harlem Hospital**: 506 Malcolm X Blvd. at W. 135th St.
- **Metropolitan Hospital Center**: 1901 1st Ave. at 96th St.
- **Mount Sinai Medical Center**: 1 Gustave L Levy Pl. (5th Ave.) at E. 98th St.
- **New York-Presbyterian- Weill Cornell**: 525 E. 68th St. at York Ave.
- **Mt. Sinai Morningside (Formerly St. Luke's)**: 1111 Amsterdam Ave.

Counseling, Legal, and Informational Resources

If you believe you have experienced an assault – remember, it is not your fault. If you experience sexual assault, the following guidance is important to consider:

Safety first! Get to a safe place. After experiencing a traumatizing event such as sexual assault, it can be important to find a place where you feel comfortable and safe from harm. This location could be your home, a friend's home, a local hospital, Campus Security, or a police station. Other resources include:

Continued on next page

- **Employee Assistance Program** (EAP): The EAP is offered through our human resources vendor Co-Advantage, in partnership with Espyr; Employees can call Espyr directly at 1.866.570.3478. To access Espyr's website, visit NYLS's HR Self-Service Center on the portal at **go.nyls.edu**, then "Staff Resources" → "Human Resources" → "Employee Assistance Program."

- **Crime Victims Treatment Center** of St. Luke's Roosevelt Hospital (CVTC): **http://www.cvtc-slr.org.** CVTC provides respectful treatment of survivors of family and intimate partner violence, sexual assault, childhood sexual abuse, and other forms of violence and crime. CCTV services are free of charge.

- **Anti-Violence Project** (AVP) is a New York-based resource. AVP provides free and confidential assistance to thousands of lesbians, gay, bisexual, transgender, queer, and HIV-affected (LGBTQH) people each year from all five boroughs of New York City through direct client services and community organizing, and public advocacy. Find more information on their website at **www.avp.org** or reach their bilingual (English/Spanish) hotline at 212.714.1141.

- **Sanctuary for Families**, PO Box 1406, Wall Street Station, 212.349.6009, **https://www.sanctuaryforfamilies.org/**. Annually, Sanctuary for Families serves more than 10,000 individuals who experience some form of domestic violence, sex trafficking, and related forms of gender violence. Its free services include counseling, legal assistance, crisis, and temporary shelter, community education, and advocacy, among others.

- **NYC Family Justice Centers:** The Family Justice Centers are run by the Mayor's Office to End Domestic and Gender-Based Violence. There is one such center in each of the five boroughs. Find more information at **https://www.nyc.gov/site/ocdv/programs/family-justice-centers.page**, or call the City's 24-hour Domestic Violence Hotline, 800.621.HOPE (4673) for immediate safety planning, shelter assistance, and other resources. TTY: 800.810.7444.

- **Safe Horizon,** 2 Lafayette Street, 3rd Floor, 1.800.621.HOPE (4673), **http://www.safehorizon.org/.** Through its fifty-seven programs, Safe Horizon assists those who have experienced domestic and intimate partner violence, child physical and sexual abuse, human trafficking, stalking, youth homelessness, and other violent crimes. Its free services include counseling, legal representation, and housing and employment assistance, among others.

Other helpful external resources:

- NYC Alliance Against Sexual Assault: **http://www.svfreenyc.org/**
- Support Orthodox Victims of Rape and Incest (SOVRI) Sexual Abuse Helpline (in conjunction with The Beth Israel Victim Services Program): 212.844.1495
- Rape, Abuse, and Incest National Network: **https://ohl.rainn.org/online/**
- Rape, Sexual Assault, and Incest Hotline: 212.227.3000 (24 hours a day)
- Bronx Rape Crisis Program: 718.933.1000
- Brooklyn Rape Crisis Program: 718.827.4700
- Queens Rape Crisis Program: 718.291.2555
- Staten Island Rape Crisis Program: 718.720.2591
- The New York District Attorney's office offers centralized information about options and resources, including

Continued on next page

information about protective orders related to domestic violence. Please visit: **http://manhattanda.org/resources-victims-domestic-violence**

Note: all rape crisis program services are free of charge.

Fire Safety

Under the Higher Education Act of 2008, New York Law School expanded its Annual Security Report in 2009 to report fire incidents on campus and in on-campus student housing (As noted, the Law School no longer maintains campus housing.) Statistical information submitted to the Department of Education must include the following:

- Number of fires and cause of each fire
- Whether the fire cause was intentional, unintentional, or undetermined
- Number of deaths related to the fire
- Number of injuries related to the fire
- Number of injuries related to the fire that resulted in the treatment at a medical facility
- Value of property damaged

The Annual Fire Safety Report must also be issued to the campus community by October 1, and to the Department of Education when requested. The report must include the following:

- Fire statistics
- A description of the new fire safety systems for each on-campus student housing facility
- Number of fire drills held the previous year
- Policies or rules on portable electrical appliances, smoking, and open flame in student housing facilities
- Student housing evacuation procedures
- Fire safety education and training programs for students, faculty, and employees
- Titles of each person or organization to which individuals should report that a fire has occurred
- Plans for future improvements in fire safety

A Fire Log, similar to the Crime Log, must also be made available to the community and include the following information:

- The date the fire was reported
- Nature and cause of the fire
- Whether the fire cause was unintentional, intentional, or undetermined
- The date the fire occurred
- The time of day the fire occurred
- The location of the fire

This public Fire Log containing all fire-related incidents is maintained by Sean Frett, the Manager of Security and Life Safety, and is available for inspection weekdays during regular business hours. An electronic version of the Log is posted at **http://emergency.nyls.edu**. The definition of fire for reporting is any instance of open flame or other burning in a place not intended to contain the burning or in an uncontrolled manner.

Continued on next page

Incidents on Campus

In 2025, NYLS had a total of three fire alarms reported. Two of the three were false alarms. The third incident was caused by a defective HVAC belt that overheated and triggered a smoke alarm on the campus' mechanical floor during overnight hours. There was no actual fire, no building evacuations, and no injuries associated with this event. FDNY responded and quickly cleared the campus.

The NYLS campus maintains Fire Life Safety Directors (FLSDs) per Local Law #5 of 1973, which covers commercial buildings exceeding a certain occupancy threshold. Such buildings, including the NYLS campus buildings, are also required to develop and maintain a Fire Safety Plan (FSP) approved by the FDNY.

NYLS Campus Fire Alarm System

The NYLS campus is currently protected by a Class "E" Campus-Wide System that was approved by the FDNY on July 7, 2016. The system consists of two panels covering the West, Center, and East campus buildings. The panel in the West Campus building is staffed 24 hours a day, 7 days a week, by a licensed certified FLSD and or Building Evacuation Supervisor (BES) and is considered the primary fire panel for the entire campus. The panel located in the East Campus building serves as a secondary panel to the primary.

Although each campus building has unique fire safety equipment, the NYLS campus buildings collectively are covered 100% by automatic sprinkler heads and protected by various fire alarm devices as follows:

- Smoke Detectors
- CO2 Detectors
- HVAC Duct Detectors
- Elevator Lobby Detectors
- Waterflow Detectors
- Manual Pull Stations
- Warden Phones
- Fire Suppression Systems (cafeteria only)
- Fire Pump
- Tamper Switches (valves)
- Standpipe Systems (West and East campus)

Both system panels are monitored 24 hours a day by a central station operator as required by law. NYLS works with a consultant and the FDNY whenever the campus-wide Fire Safety Plan needs to be amended.

Reporting and Preventing Dangerous Conditions

Although NYLS maintenance employees conduct daily checks of all mechanical equipment and service rooms and the security employees conduct periodic patrols throughout the Law School facilities, we also need your assistance to help us maintain a safe environment. Please do the following:

Continued on next page

1. Report all suspicious odors to the officer at the 185 West Broadway Lobby Desk, or to extension 2123.
2. Do not block exit doors, corridors, exterior walkways, or aisles with packages, trash, or furniture. Contact the Office of Maintenance and Operations to have these items removed directly to storage or the trash area for disposal.
3. Keep exit stair doors closed *at all times*! It is a violation of the New York City Fire Prevention Code to prop open exit stair doors. If a fire were to occur, smoke, heat, and flames could enter the stair and block this exit route.
4. Contact the Office of Maintenance and Operations, **maintenance@law.nyls.edu**, if a light bulb has blown out, there is water on the floor or carpets, other floor materials present a tripping hazard, a door does not close properly, or you note other conditions which could prevent a safe evacuation.
5. Limit the use of personal appliances and non-office equipment that generate power surges. Always turn off all appliances and equipment when you are away from your office for extended periods and before you leave at the end of the day.
6. Limit the use of power strips and extension cords. If you must use an extension cord, use only electrical devices with the Underwriters Laboratories (UL) seal of approval. Do not place electrical cords across a hall or path.
7. Keep your office and storage spaces neat. Dispose of trash promptly. If your storage room contains mechanical equipment, please do not store materials on top of or in close proximity to this machinery.
8. Do not store materials on top of or near a computer monitor or central processing unit. This equipment requires a minimum of six inches between it and other items for proper ventilation.
9. All New York Law School facilities are smoke-free environments. Report all violators to the officer at the 185 West Broadway Lobby Desk at 212.431.2123.
10. *Never* attempt to extinguish a fire yourself! Fire and smoke can quickly fill an area. Use this time to alert others of this emergency. The elevators must *never* be used to exit a floor. The fire department personnel will need to use the elevators to evacuate disabled persons and for other firefighting duties. ***Unless otherwise directed by fire department personnel, you must only exit a floor by use of the stairs!*** Never prop open or block the doors that lead to these stairs.

Please note:

- The use of electrical heaters, grills, and any gas-powered equipment and appliances is prohibited in any campus building.
- Smoking of any kind, including electronic cigarettes and "vaping" is not permitted inside any campus building or within twenty feet of any campus building's main entrance.
- Use of any open flame is not permitted unless authorized; proper permits and certificates must be in place before commencing the use of any device such as a torch, welder, or grinder that will emit a flame or spark. The Facilities Director is responsible for ensuring such Hot Work Permits are issued following the building rules and regulations.

Evacuation Drills

The NYLS Office of Security and Life Safety conducts and documents evacuation drills three (3) times per year, during both the morning and evening. These drills are not announced to the NYLS community in advance. In 2025, six (6) total evacuation drills were conducted on the following dates:

Continued on next page

- April 2, 2025, June 9, 2025, and September 25, 2025 (one at 10:30 am and 7:30 pm on each date; each evacuation drill took approximately fifteen minutes to conduct)
- During such evacuation drills, all community members are required to vacate the buildings and report to the designated assembly areas below:
- Assembly Area A – West Broadway between Leonard Street (one block north of Worth Street) and Franklin Street; this is the primary evacuation location for all Law School community members.
- Assembly Area B – Finn Square bordered by Varick Street (on the west), West Broadway (on the east) and Franklin Street (to the north).
- Overflow from these locations should utilize Varick Street north of the Square Diner, located at the intersection of Leonard Street and Varick Street.

Evacuation Guidelines

These guidelines apply to all NYLS campus buildings (185 West Broadway, 55 Worth Street, and 57 Worth Street).

When instructed by the Fire Life Safety Director to evacuate the buildings, upon arriving at the sidewalk, walk to and gather at one of the assembly areas indicated above, as instructed. Meeting at an assembly area will further enhance the safety of the community following an evacuation of the buildings by:

1. Eliminating street crossings at busy vehicular intersections.
2. Re-locating away from the Law School buildings.
3. Gathering in a designated location to obtain additional safety information or instructions.

Do not attempt to cross mid-block. Always cross at the pedestrian crosswalk and obey the traffic signal. Walk north on the sidewalks to the Assembly Areas identified as A and B above.

- **Emergency Evacuation**

  Await instructions from the Fire Life Safety Director. If directed, all occupants must exit the building by using *all available stairs- not just a favorite stair-* and *all available doors at sidewalk level- not just the entrance you normally use* - when instructed by the Fire Life Safety Director or the floor Fire Warden.

  1. **Do not panic - remain calm**. Follow the instructions of the floor Fire Wardens, searchers, and staff members.
  2. Close all doors behind you. Do not stop to collect personal belongings. Proceed to the nearest stairs and exit the building. *Do not run* and do not use the elevators to exit the floor!
  3. Disabled persons evacuation assistance: see "Volunteers to Assist Community Members With Disabilities" on page 36.
  4. *Meet at the Assembly Areas.* After you exit the building, you must walk toward West Broadway and gather along the sidewalks near the assembly areas identified above. The assembly areas are the *only* locations where you should go after you evacuate the building;
  5. *Never* attempt to extinguish a fire yourself! Fire and smoke can quickly fill the area. Use this time to alert others to evacuate by activating a pull station.

Continued on next page

6. The elevators must *never* be used to exit a floor. Fire department personnel will need to use the elevators to evacuate disabled persons and for other firefighting duties. *Unless otherwise directed by* fire department personnel, you must only exit a floor by use of the emergency stairways.
7. ***In an actual emergency do not wait to collect personal property. Begin evacuating the floor when directed***.
8. Mounted on the wall of every elevator lobby is a copy of the Emergency Evacuation Guidelines.

- **If You Discover or Are Near a Smoke Condition or Fire**

1. Evacuate the area and close all doors in the vicinity of fire or major smoke conditions.
2. Activate a pull station device by pulling the black lever down to alert other people in adjacent offices, classrooms, and restrooms and throughout the building.
3. Do not open any doors that feel warm to the touch. If there is heat or smoke in an area, crawl on the floor to the nearest exit. If you are trapped in a smoke-filled room stay near the floor or near a window where you can call or signal. Use a handkerchief or a shirt to draw attention for help. ***Do not panic.***
4. Proceed to the nearest stairs. **Do not run** and do not use the elevators to exit the floor! Follow the instructions of the floor Fire Wardens and faculty members.
5. Disabled persons' evacuation assistance: see "Volunteers to Assist Community Members" on this page.
6. If the situation permits, use the floor warden station (Instructions- Open the red box mounted near the elevators, lift the receiver, and speak) to notify the Fire Life Safety Director. Otherwise, evacuate the floor. At the building lobby, inform a security officer about what you observed so the evacuation plan can be activated.
7. Meet at the Assembly Areas – See Emergency Evacuation above item #4.

- **Volunteers to Assist Community Members With Disabilites**

Instead of relying solely on the Fire Wardens and Searchers as their primary person for evacuation assistance, persons with disabilities, or otherwise in need of evacuation assistance, can identify volunteers in advance who will assist in a drill or emergency evacuation. A meeting will be scheduled with each person with disabilities to discuss the evacuation plan and to incorporate any additional assistance that may be needed. This guideline will apply to all persons with disabilities whether members of the community or outside visitors. Any community member that requires assistance during evacuation drills or in emergencies should contact the Office of Security and Life Safety at 212.431.2123.

- **Evacuation Preparedness Contacts**

185 West Broadway Lobby (Office of Security and Life Safety): 212.431.2123

Office of Maintenance and Operations: 212.431.2820/2847

FDNY: 212.999.2222/911

NYPD 1st Precinct: 212.334.0611/911

- **Know All Available Exits**

Posted on the wall at the elevator are an egress sign and floor organization charts with emergency information. The

Continued on next page

sign denotes your present location (*You are here*). Every stair and the elevator is identified by a letter of the alphabet. A sign which notes the alphabet designation is mounted on the lobby and stair side of the fire exit stair door. A sign which notes the floor number is also mounted on the stair side of the same stair door. The stairway is also identified by an illuminated sign near or above it with the word *Exit* in red letters. Please study this map while you are waiting for the elevator. During an evacuation, you should use *all* available emergency stairs, not only the one you commonly use.

Response to Medical Emergencies

If you or a fellow member of the community requires medical assistance, contact the security officer at the 185 West Broadway Lobby Desk at extension 2123. ***Remember to tell the agent your location, who is injured, and what happened.*** The officer will notify the Vice President of Security and Community Affairs, and/or a security employee who is a certified first aid responder. If this is an emergency, the officer will contact the NYPD 9-1-1 Operator to request EMS assistance. New York-Presbyterian Lower Manhattan Hospital is located at 69 Gold Street (between Beekman Street and Spruce Street), a six-minute car ride from the Law School. Since May 22, 2000, the Law School has been licensed to possess and operate an automatic external defibrillator (AED). When used by certified security personnel along with cardio-pulmonary resuscitation, an AED could help extend the life of an individual who is experiencing cardiac arrest.

Non-Emergency Medical Care

New York Law School community members may obtain non-emergency medical care through various private Urgent Care facilities located near campus. You may be charged for such services.

Employee Training

On-site employees who comprise the certified AED response team include all Security Supervisors and full-time and contract security officers. The Manager of Security and Life Safety is the administrator of the training program as well as our First Aid/CPR/AED certification programs for the department. All security staff receive refresher courses each year and re-certification every two years. Since the publication of the prior Report, training for this reporting period was conducted by the Office of Security and Life Safety for each security team member.

Fire Safety and Training

All community members involved with the Fire Safety Plan of NYLS receive the following training on campus and/or via a remote link:

- **Floor Organization Teams**
  All Wardens, Deputy Wardens, and Searchers received training twice per year. Training sessions are scheduled by the Office of Security and Life Safety. Trainings were conducted via email, with training videos provided to the members on March 27, 2025 and September 10, 2025.

- **Fire Brigade & BES Teams**
  All members of the NYLS fire brigade team receive training twice per year. Training was conducted via safety videos created by the Office of Security and Life Safety, on March 25, 2025 and September 8, 2025.

Continued on next page

Campus Crime Statistics (On-Campus and Non-Campus Properties)

The Clery Act requires the disclosure of crime statistics in an annual security report and web-based collection for specific crimes that occur within the Law School's Clery Geography, i.e., on campus, on non-campus, and contiguous public property (i.e., the streets and sidewalks immediately adjacent to the Law School at West Broadway, Leonard Street, Church Street, and Worth Street). Statistics are reported for all times of the day, including the times outside of Monday through Friday regular business hours or the times the Law School is officially closed.

To see historical records, please speak with the Vice President of Security and Community Affairs or a Security Manager. On page 39–41 is a list of campus crimes reported to employees in the Office of Security and Life Safety, for calendar years 2023, 2024, and 2025, that are reportable to the community only. The Office of Security and Life Safety documents all reported crimes whether or not they are Clery-defined crime-reporting incidents. Effective with the 2014-2015 report, the annual security and fire report for colleges and universities is required to include statistics compiled for instances of sexual assault, domestic violence, dating violence, and stalking that are reported to Campus Security Authorities, Title IX Coordinators, and local police agencies.

As noted, Campus Security Authorities have an obligation to promptly notify the Chief Compliance Officer, General Counsel, and Vice President of Security and Community Affairs, of any crimes they may become aware of on campus property, on non-campus property, and on public property that is reasonably contiguous to the Law School. As a double check, all Campus Security Authorities were contacted by electronic mail on May 6, 2025, by the Vice President of Security and Community Affairs, and asked whether there were any crime incidents which they were aware of but had not yet reported. There were no such reports provided.

- **Sources for Criminal Statistics**

  Statistics for 2025 for the required geographic reporting area for campus and non-campus locations were requested from senior police officials at the First Precinct on April 17, 2026. None of the provided crime data reflected reportable crimes. Precinct-wide crime data may be found at the following website: **http://www1.nyc.gov/site/nypd/bureaus/patrol/precincts/1st-precinct.page**. Information about NYLS campus crime statistics may also be found on the **U.S. Department of Education website**.

Sex Offender Registries

Law enforcement agency information provided by New York and other nearby states concerning registered sex offenders may be obtained from the following websites:

New York: **The Official New York State Sex Offender Registry - NY DCJS**

Neighborhood: **http://www.criminaljustice.ny.gov/nsor/index.htm**

Connecticut: **http://www.communitynotification.com/cap_office_disclaimer.php?office=54567**

New Jersey: **http://www.state.nj.us/njsp/info/reg_sexoffend.html**

Pennsylvania: **http://www.pameganslaw.state.pa.us/**

Campus Crime Log

The Law School's Campus Crime Log lists all crimes including date, time, location, nature, and disposition reported to Campus Security Authorities. This public Log is maintained by the Vice President of Security and Community Affairs and

Continued on next page

is available for inspection weekdays during regular business hours. An electronic version is also posted on the portal at https://lawnyls.sharepoint.com/sites/NYLSResourcesPortal/SitePages/CampusSafety/campus-safety.aspx

Crime statistics must be reported under the definitions used in the Federal Bureau of Investigation's Uniform Crime Reporting (UCR) System and presented by the following geographical locations: (i) the on-campus property, (ii) the non-campus property, and (iii) public property that is reasonably contiguous to the Law School.

Entries to the Campus Crime Log must be made within two business days of the report of the incident. The only instance where information would be withheld is where the information could jeopardize an ongoing criminal investigation or pose a threat to the safety of an individual. The following tables set forth the on-campus crime statistics for the prior three calendar years.

TOTAL REPORTABLE CLERY GEOGRAPHY CRIME STATISTICS

2025[2]

Offense	On Campus	Non-Campus	Public Property	Total
Murder/Non-Negligent Manslaughter	0	0	0	0
Manslaughter by Negligence	0	0	0	0
Rape	0	0	0	0
Fondling	1	0	0	0
Incest	0	0	0	0
Statutory Rape	0	0	0	0
Robbery	0	0	0	0
Aggravated Assault	0	0	0	0
Burglary	0	0	0	0
Motor Vehicle Theft	0	0	0	0
Arson	0	0	0	0
Domestic Violence	0	0	0	0
Dating Violence	0	0	0	0
Stalking	0	0	0	0
Weapons Law Violations - Arrests	0	0	0	0
Drug Law Violations - Arrests	0	0	0	0
Liquor law Violations - Arrests	0	0	0	0
Weapons Law Violations - Referred for Disciplinary Action	0	0	0	0
Drug Law Violations - Referred for Disciplinary Action	0	0	0	0
Liquor law Violations - Referred for Disciplinary Action	0	0	0	0
Hate Crimes	0	0	0	0

[2] In 2025, a female student alleged to the NYLS Title IX office that, in the Fall of 2024, she was fondled without her consent by a male student in a campus elevator. After an investigation, the complainant and the respondent mutually agreed to resolve the complaint without a finding of wrongdoing by the respondent.

Continued on next page

2024[3]

Offense	On Campus	Non-Campus	Public Property	Total
Murder/Non-Negligent Manslaughter	0	0	0	0
Manslaughter by Negligence	0	0	0	0
Rape	0	0	0	0
Fondling	0	0	0	0
Incest	0	0	0	0
Statutory Rape	0	0	0	0
Robbery	0	0	0	0
Aggravated Assault	0	0	0	0
Burglary	0	0	0	0
Motor Vehicle Theft	0	0	0	0
Arson	0	0	0	0
Domestic Violence	0	0	0	0
Dating Violence	0	0	0	0
Stalking	0	0	0	0
Weapons Law Violations - Arrests	0	0	0	0
Drug Law Violations - Arrests	0	0	0	0
Liquor law Violations - Arrests	0	0	0	0
Weapons Law Violations - Referred for Disciplinary Action	0	0	0	0
Drug Law Violations - Referred for Disciplinary Action	0	0	0	0
Liquor law Violations - Referred for Disciplinary Action	0	0	0	0
Hate Crimes	0	0	0	0

[3] There were no unfounded crimes reported in 2024.

Continued on next page

2023[4]

Offense	On Campus	Non-Campus	Public Property	Total
Murder/Non-Negligent Manslaughter	0	0	0	0
Manslaughter by Negligence	0	0	0	0
Rape	0	0	0	0
Fondling	0	0	0	0
Incest	0	0	0	0
Statutory Rape	0	0	0	0
Robbery	0	0	0	0
Aggravated Assault	0	0	0	0
Burglary	0	0	0	0
Motor Vehicle Theft	0	0	0	0
Arson	0	0	0	0
Domestic Violence	0	0	0	0
Dating Violence	0	0	0	0
Stalking	0	0	0	0
Weapons Law Violations - Arrests	0	0	0	0
Drug Law Violations - Arrests	0	0	0	0
Liquor law Violations - Arrests	0	0	0	0
Weapons Law Violations - Referred for Disciplinary Action	0	0	0	0
Drug Law Violations - Referred for Disciplinary Action	0	0	0	0
Liquor law Violations - Referred for Disciplinary Action	0	0	0	0
Hate Crimes	0	0	0	0

TOTAL REPORTABLE INCIDENTS OF HAZING (as defined in the Stop Campus Hazing Act and under New York State Law): 0

[4] There were no unfounded crimes reported in 2023.

Continued on next page

How to Obtain Crime and Fire Statistics reported to the Office of Post-Secondary Education

In compliance with the Clery Act, all federally funded public and private colleges and universities are required to annually report crime and fire statistics by October 1 to the office of Post-Secondary Education of the United States Department of Education (DOE). The Vice President of Security and Community Affairs will submit this information annually. The most current statistics will be reported to the DOE on or about October 1, 2026 and you can view the statistics reported to the Office of Post-Secondary Education by visiting their website **https://ope.ed.gov/security**

Appendix 1: Relevant Statutory Provisions

The Jeanne Clery Campus Safety Act ("Clery Act")

The Clery Act took effect on September 1, 1991. The Clery Act was passed in response to concerns that higher educational institutions were not making public information that would allow people to know how well institutions were providing for the safety of all persons who lived or worked on campus and to prospective members of the college or university community. The DOE was charged with enforcing the Clery Act and working with colleges and universities to meet its mandate. Amendments to the Clery Act passed in 1992, 1998, 2000, 2008, 2013, and 2024 expanded the scope of the law to include sexual assault and hazing reporting, stating requirements where sexually violent offenders are on college and university campuses, clarification on crime records status under the Family Educational Rights and Privacy Act, emergency response and evacuation procedures, missing student notification, fire incidents, and safety and general clarifications on key provisions.

The Clery Act requires that a higher education institution give timely warnings of crimes that pose a threat to personal safety, publish emergency response guidelines, notify the college and university community of real-time emergencies and threats, and make public campus security policies and procedures. By October 1 of each year the Clery Act requires each higher education institution participating in any federal program to prepare, publish, distribute, and provide in hard or electronic means to all current students and employees, and any applicant for enrollment or employment, upon request, an annual security and fire report that includes at a minimum the following information:

1. How to report criminal actions or emergencies and a description of how security employees will respond.
2. Emergency response and evacuation procedures and timely warning communication policy.
3. Current policies concerning security and access to campus facilities.
4. Campus security personnel and their relationship with local police.
5. Security programs and activities for encouraging personal and community safety.
6. Missing student notification procedures.
7. Policy concerning possession, use, and sale of alcoholic beverages or illegal drugs and the enforcement of drug-related laws.
8. Drug and alcohol abuse education programs.
9. Statistics for the three most recent calendar years of the occurrence on campus, on non-reporting campus property, and on public property of the following that are reported to local police agencies or a Campus Security Authority: criminal homicide (murder and non-negligent and negligent manslaughter), forcible sex offenses and non-forcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, arson, arrests or persons referred for campus disciplinary action for illegal weapons violations, drug-related violations, and liquor law violations.

Continued on next page

10. Statistics for the three most recent calendar years by category of prejudice, of any crimes noted in item #9 above involving bodily injury to any persons in which the victim is intentionally selected because of the actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability including crimes of larceny-theft, simple assault, intimidation, and destruction/damage/vandalism of property.
11. Statistics for the three most recent calendar years concerning the occurrence in campus student housing facilities of fires reported to local fire department agencies or to a Campus Security Authority including the date the fire was reported, the nature of the fire, the date and time of the fire, and the general location of the fire.
12. Sexual assault prevention program policy, and information on where to report a sexual assault to campus and local law enforcement authorities.
13. Location of a campus crime log that notes all reported crimes by date, time, location, nature and disposition.
14. Location of a campus fire log that notes all reported fires in on-campus student housing including the date the fire was reported, the nature of the fire, the date and time of the fire, and the general location of the fire.

Higher education institutions must also:

15. Submit crime, hazing, and fire statistics to the Law School community and the DOE online by October 1.
16. Create anti-hazing policies and procedures.

Title IX of the Education Amendments of 1972

Title IX of the Education Amendments of 1972 (Title IX) protects people from discrimination based on sex in education programs or activities that receive federal financial assistance. The U.S. Department of Education's Office of Civil Rights is responsible for enforcing Title IX. The law states that no person in the United States shall, based on sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving federal financial assistance. The law creates obligations for a college or university to investigate and take prompt and effective action to prevent the recurrence of discrimination and remedy its effects. The college incurs this obligation when the Title IX Coordinator receives information about potential sex discrimination. Any non-confidential employee at a postsecondary institution of education who either has authority to take corrective action on behalf of the institution or has responsibility for administrative leadership, teaching, or advising in the institution's education program or activity is obligated to notify the Title IX Coordinator when the employee learns of potential sex discrimination. All other non-confidential employees at a postsecondary institution are obligated to either notify the Title IX Coordinator or provide the contact information of the Title IX Coordinator and information about how to make a complaint of sex discrimination to any person who provides the employee with information about conduct that reasonably may constitute sex discrimination.

Violence against Women Reauthorization Act of 2013 (Pub. Law 113-4)

On March 7, 2013, President Obama signed the Violence against Women Reauthorization Act of 2013 (Public Law 113-4). Among other provisions, this law amended Section 485(f) of the Higher Education Authorization Act. The statutory changes required colleges and universities to complete statistics for instances of sexual assault, domestic violence, dating violence, and stalking that are reported to Campus Security Authorities or local police agencies. These revisions have been incorporated into the annual report for colleges and universities about these crimes and regulations set forth by the established DOE guidelines.

Continued on next page

State of New York Education Law

State Education Law Article 129-A, entitled "Regulation by Colleges of Conduct on Campuses and Other College Property Used for Educational Purposes," requires all colleges in the State of New York to create certain policies and procedures and to certify annually that the information concerning such policies and procedures has been provided to students. The requirements of Article 129-A are fully covered in this Report, and in posted NYLS policies and training. The Article outlines requirements for maintaining public order on higher education campus properties, including the creation of an Advisory Committee on Campus Security (Section 6431); informing the community of sexual assault, domestic violence, and stalking prevention information (Section 6432); noting campus crime reporting procedures and statistics (Section 6433); and outlines procedures for investigating violent felony offenses and reports of missing students (Section 6434); Section 6435 describes the responsibilities for campus security officers who are employed at colleges outside the limits of any city having a population of fewer than one million persons. (This section does not apply to New York Law School); Section 6436 establishes requirements that the Law School must adhere to in providing information to students about bias-related crimes; Section 6437 prohibits the marketing of credit cards except within specific guidelines stated by the law. The Law School has adopted this guideline as its marketing policy. The open advertising, marketing, or merchandising of credit cards to faculty, students, or employees is prohibited; and Section 6438 requires the Law School to provide written notification to students residing in NYLS-owned or operated housing concerning a description of such housing facility's fire safety system, including whether the housing is or is not equipped with a sprinkler system. The Law School must also indicate, within such written notification, how to access the campus fire safety report on student housing.

All colleges that receive state aid must provide information to students about bias-related crimes under Section 6436 of the New York State Education Law. Also, this Report notes, in several references, the location of the Office of Security and Life Safety and contact information for the Vice President of Security and Community Affairs, who can provide the same statistical information.

Section 6434 of the Education Law requires college and university security departments to investigate any hate crime or violent felony offense, as defined in the New York State Penal Law, occurring at or on the grounds of each such institution, and provides for the investigation of a report of any missing student. Campus security must coordinate the investigation of such crimes and reports with local law enforcement agencies. This includes situations where a student is at or on the grounds of a college or university, or a report that any college or university student who resides in a facility owned or operated by the college or university is reported missing from their residence. In these instances, the local police authority must be promptly contacted.

Article 129-B, entitled "Implementation by Colleges and Universities of Sexual Assault, Dating Violence, Domestic Violence and Stalking Prevention and Response Policies and Procedures," requires higher education institutions to adopt written rules implementing Article 129-B by amending its code of conduct or other comparable policies (Section 6440); Article 129-B, the provisions of which are fully covered in this Report and in the NYLS Sexual Misconduct Policy, requires such institutions to: adopt a definition of "affirmative consent to sexual activity," as set forth in Section 6441(1); adopt a policy for alcohol and/or drug use amnesty, as set forth in Section 6442; adopt a Student's Bill of Rights, as set forth in Section 6443; advise reporting individuals of their rights regarding reports of sexual assault (Section 6444); conduct, no less than every other year, a campus climate assessment to ascertain general awareness and knowledge of the provisions of Article 129-B (Section 6445). The Law School last conducted such a campus climate assessment in on or about April 2025; the results can be found at **https://www.nyls.edu/title-IX-campus-survey** and were posted on the Law School portal for the community. The next climate assessment report is due in the spring of 2027 and NYLS will continually ensure that reporting individuals always have information regarding the confidential reporting of domestic violence, dating violence, stalking, or sexual assault, and related procedures (Section 6446); adopt a comprehensive student onboarding and ongoing education campaign to educate members of the Law School community about domestic

Continued on next page

violence, dating violence, stalking, and sexual assault, in compliance with applicable federal laws, including the Clery Act as amended by the Violence Against Women Act (Section 6447); and make an annual report to the State education department containing specified information about reports of domestic violence, dating violence, stalking, and sexual assault (Section 6449).

The Federal Bureau of Investigation's Hierarchy Rule must apply when counting multiple offenses. This rule requires that the most serious offense be counted when more than one offense was committed during a single incident at the same time and place. The Clery Act hierarchy and primary crimes are:

- Murder and Non-negligent Manslaughter
- Negligent Manslaughter
- Sex Offenses (Rape, Fondling, Incest, Statutory rape)
- Robbery
- Aggravated Assault
- Burglary
- Motor Vehicle Theft
- Arson
- Disciplinary Action
- Hate Crimes (Larceny/Theft, Simple Assault, Intimidation, Destruction/Vandalism Property)
- Dating and Domestic Violence, and Stalking

Definitions of these crimes under the Clery Act follow. See 34 CFR Pt. 668, Subpt. D, App. A

Primary Crimes

- Arson: Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc.
- Criminal Homicide—Manslaughter by Negligence: The killing of another person through gross negligence.
- Criminal Homicide—Murder and Nonnegligent Manslaughter: The willful (nonnegligent) killing of one human being by another.
- Rape: The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
- Fondling: The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.[5]

[5] Effective June 23, 2025, the Federal Bureau of Investigation, Criminal Justice Information Service Division, updated its National Incident-Based Reporting System User Manual, and replaced the category of "Fondling" with the offense of "Criminal Sexual Contact." Criminal Sexual Contact is now defined as:

The intentional touching of another person's clothed or unclothed body parts without consent, for the purpose of sexual degradation, sexual gratification, or sexual humiliation. This definition explicitly applies when the victim is incapable of giving consent due to age, mental or physical impairment (temporary or permanent).

The Clery Act has not yet adopted this change in definitions and any such changes will be reflected in future iterations of this Report.

Continued on next page

- Incest: Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- Statutory Rape: Sexual intercourse with a person who is under the statutory age of consent.
- Robbery: The taking or attempting to take anything of value from the care, custody, or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.
- Aggravated Assault: An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm. (It is not necessary that injury result from an aggravated assault when a gun, knife, or other weapon is used which could and probably would result in serious personal injury if the crime were successfully completed.)
- Burglary: The unlawful entry of a structure to commit a felony or a theft. For reporting purposes this definition includes: unlawful entry with intent to commit a larceny or felony; breaking and entering with intent to commit a larceny; housebreaking; safecracking; and all attempts to commit any of the aforementioned.
- Motor Vehicle Theft: The theft or attempted theft of a motor vehicle. (Classify as motor vehicle theft all cases where automobiles are taken by persons not having lawful access even though the vehicles are later abandoned—including joyriding.)

Arrests and Referrals

- Weapons: Carrying, Possessing, etc.: The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices, or other deadly weapons.
- Drug Abuse Violations: The violation of laws prohibiting the production, distribution, and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation, or importation of any controlled drug or narcotic substance. Arrests for violations of State and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs.
- Liquor Law Violations: The violation of State or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of alcoholic beverages, not including driving under the influence and drunkenness.

Hate Crimes

- Hate crime: A crime reported to local police agencies or to a campus security authority that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. For the purposes of this section, the categories of bias include the victim's actual or perceived race, religion, gender, gender identity, sexual orientation, ethnicity, national origin, and disability.
- Larceny-Theft (Except Motor Vehicle Theft): The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another. Attempted larcenies are included. Embezzlement, confidence games, forgery, worthless checks, etc., are excluded.
- Simple Assault: An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.

Continued on next page

- Intimidation: To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.
- Destruction/Damage/Vandalism of Property: To willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

Violence Against Women Act Crimes

- Dating violence: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim.

  (i) The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

  (ii) For the purposes of this definition—

  (A) Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.

  (B) Dating violence does not include acts covered under the definition of domestic violence.

  (iii) For the purposes of complying with the requirements of this section and § 668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

- Domestic violence: A felony or misdemeanor crime of violence committed—

  (A) By a current or former spouse or intimate partner of the victim;

  (B) By a person with whom the victim shares a child in common;

  (C) By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;

  (D) By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred, or

  (E) By any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

  For the purposes of complying with the requirements of this section and § 668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

- Stalking: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to—

  (A) Fear for the person's safety or the safety of others; or

  (B) Suffer substantial emotional distress.

  For the purposes of this definition—

  (A) Course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.

  (B) Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.

Continued on next page

(C) Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

For the purposes of complying with the requirements of this section and § 668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Appendix 2: Definitions Related to VAWA Offenses

The Violence Against Women Act (VAWA) also requires NYLS to include certain New York State criminal definitions in this Annual Security Report and also requires that these definitions be provided in other materials disseminated by the Law School. Summaries of and citations to relevant New York definitions are set forth below.[6] Ultimately, a prosecutor will determine whether an act meets the criminal standard under applicable law.

Consent[7]: Lack of consent results from: forcible compulsion; or incapacity to consent; or where the offense charged is sexual abuse or forcible touching, any circumstances, in addition to forcible compulsion or incapacity to consent, in which the victim does not expressly or impliedly acquiesce in the actor's conduct. Where the offense charged is rape in the third degree, a criminal sexual act in the third degree, or forcible compulsion in circumstances under which, at the time of the act of intercourse, oral sexual conduct, or anal sexual conduct, the victim clearly expressed that he or she did not consent to engage in such act, and a reasonable person in the actor's situation would have understood such person's words and acts as an expression of lack of consent to such act under all the circumstances. A person is incapable of consent when he or she is: less than 17 years old; or mentally disabled; or mentally incapacitated; or physically helpless; or committed to the care and custody or supervision of the state department of corrections and community supervision or a hospital; a local correctional facility; the office of children and family services and in residential care; a client or patient and the actor is a health care provider or mental health care provider charged with rape in the third degree, aggravated sexual abuse in the fourth degree as defined in section or sexual abuse in the third degree and the act of sexual conduct occurs during a treatment session, consultation, interview, or examination; a resident or inpatient of a residential facility operated, licensed or certified by (i) the office of mental health; (ii) the office for people with developmental disabilities; or (iii) the office of alcoholism and substance abuse services; or detained or otherwise in the custody of a police officer, peace officer, or other law enforcement official, and the actor is an individual and/or employee of such entity described in the statute acting under the circumstances described in the statute. (See NY Penal Law, §130.05)

Consent, abbreviated: Clear, unambiguous, and voluntary agreement between the participants to engage in specific sexual activity.

Dating Violence: New York State does not specifically define "dating violence." However, under New York Law, intimate relationships are covered by the definition of domestic violence when the crime is committed by a person in an "intimate relationship" with the victim. See "Family or Household Member" for definition of "intimate relationship."

Domestic Violence: An act which would constitute a violation of the penal law, including, but not limited to, acts constituting disorderly conduct, harassment, aggravated harassment, sexual misconduct, forcible touching, sexual abuse, stalking, criminal mischief, menacing, reckless endangerment, kidnapping, assault, attempted murder, criminal obstruction or breaching of blood circulation, strangulation, identity theft, grand larceny, or coercion; and such acts have created a substantial risk of physical or emotional harm to a person or person's child; and are alleged to have been committed by a

[6] For purposes of enforcing the expectations and requirements of this Policy, sexual and gender-based misconduct are defined in Section 13 of the Sexual Misconduct Policy. The definitions listed here applies to New York state criminal laws.
[7] The Law School defines consent as affirmative consent consistent with N.Y. Educ. Law § 6441 as described in Section 13 of the Sexual Misconduct Policy.

Continued on next page

family member. The victim can be anyone over the age of sixteen, any married person or any parent accompanied by his or her minor child or children in situations in which such person or such person's child is a victim of the act. (See NY Social Services Law, §459-A)

Family or Household Member: Persons related by consanguinity or affinity; persons legally married to one another; persons formerly married to one another regardless of whether they still reside in the same household; persons who have a child in common regardless of whether such persons are married or have lived together at any time; unrelated persons who are continually or at regular intervals living in the same household or who have in the past continually or at regular intervals lived in the same household; persons who are not related by consanguinity or affinity and who are or have been in an intimate relationship regardless of whether such persons have lived together at any time. Factors that may be considered in determining whether a relationship is an "intimate relationship" include, but are not limited to: the nature or type of relationship regardless of whether the relationship is sexual in nature; the frequency of interaction between the persons; and the duration of the relationship. Neither a casual acquaintance nor ordinary fraternization between two individuals in business or social contexts shall be deemed to constitute an "intimate relationship"; any other category of individuals deemed to be a victim of domestic violence as defined by the office of children and family services in regulation. Intimate relationship status shall be applied to teens, lesbian/gay/bisexual/transgender, and elderly individuals, current and formerly married and/or dating heterosexual individuals who were, or are in an intimate relationship. (See NY Social Services Law, §459-A)

Parent: means natural or adoptive parent or any individual lawfully charged with a minor child's care or custody. (See NY Social Services Law, §459-A)

Sexual Assault: New York State does not specifically define sexual assault. However, sexual assault includes offenses that meet the definitions of rape, fondling, incest, or statutory rape.

Sex Offenses; Lack of Consent: Whether or not specifically stated, it is an element of every sexual act committed without consent of the victim. (See NY Social Services Law, §130.05(1))

Sexual Misconduct: When a person engages in vaginal, oral, or anal sexual contact with another person without such person's consent; or engages in sexual conduct with an animal or a dead human body. (See NY Penal Law, §130.20)

Rape in the Third Degree: When a person engages in vaginal, oral, or anal sexual contact with another person who is incapable of consent by reason of some factor other than being less than 17 years old; being 21 years old or more, engages in such sexual contact with another person less than 17 years old; or engages in such sexual contact with another person without such person's consent where such lack of consent is by reason of some factor other than incapacity to consent. (See NY Penal Law, §130.25)

Rape in the Second Degree: When a person being 18 years old or more, engages in vaginal, oral, or anal sexual contact with another person less than 15 years old; or engages in such sexual contact with another person who is incapable of consent by reason of being mentally disabled or mentally incapacitated. It is an affirmative defense to the crime of rape in the second degree that the defendant was less than four years older than the victim at the time of the act. (See NY Penal Law, §130.30)

Rape in the First Degree: When a person engages in vaginal, oral, or anal sexual contact with another person by forcible compulsion; or who is incapable of consent by reason of being physically helpless; or who is less than 11 years old; or who is less than 13 years old and the actor is 18 years old or more. (See NY Penal Law, §130.35)

Criminal Sexual Act in the Third Degree: When a person engages in oral or anal sexual conduct with a person who is incapable of consent by reason of some factor other than being less than 17 years old; being 21 years old or more, with a person less than 17 years old; with another person without such person's consent where such lack of consent is by reason of some factor other than incapacity to consent. (See NY Penal Law, §130.40)

Continued on next page

Criminal Sexual Act in the Second Degree: When a person engages in oral or anal sexual conduct with another person and is 18 years or more and the other person is less than 15 years old; or who is incapable of consent by reason of being mentally disabled or mentally incapacitated. It is an affirmative defense that the defendant was less than four years older than the victim at the time of the act. (See NY Penal Law, §130.45)

Criminal Sexual Act in the First Degree: When a person engages in oral or anal sexual conduct with another person by forcible compulsion; who is incapable of consent by reason of being physically helpless; who is less than 11 years old; or who is less than 13 years old and the actor is 18 years old or more. (See NY Penal Law, §130.50)

Forcible Touching: When a person intentionally, and for no legitimate purpose, forcibly touches the sexual or other intimate parts of another person for the purpose of degrading or abusing such person; or for the purpose of gratifying the actor's sexual desire; or subjects another person to sexual contact for the purpose of gratifying the actor's sexual desire and with intent to degrade or abuse such other person while such other person is a passenger on a bus, train, or subway car operated by any transit agency, authority or company, public or private, whose operation is authorized by New York state or any of its political subdivisions. It includes squeezing, grabbing, or pinching. (See NY Penal Law, §130.52)

Persistent Sexual Abuse: When a person commits a crime of forcible touching, or second or third degree sexual abuse within the previous ten-year period, has been convicted two or more times in separate criminal transactions for which a sentence was imposed on separate occasions of one of the above mentioned crimes or any offense defined in this article, of which the commission or attempted commission thereof is a felony. (See NY Penal Law, §130.53)

Sexual Contact: Means any touching of the sexual or other intimate parts of a person for the purpose of gratifying sexual desire of either party. It includes the touching of the actor by the victim, as well as the touching of the victim by the actor, whether directly or through clothing, as well as the emission of ejaculate by the actor upon any part of the victim, clothed or unclothed. (See NY Penal Law, § 130.00(3))

Sexual Abuse in the Third Degree: When a person subjects another person to sexual contact without the latter's consent. For any prosecution under this section, it is an affirmative defense that such other person's lack of consent was due solely to incapacity to consent by reason of being less than 17 years old; and such other person was more than 14 years old and the defendant was less than five years older than such other person. (See NY Penal Law, §130.55)

Sexual Abuse in the Second Degree: When a person subjects another person to sexual contact and when such other person is incapable of consent by reason of some factor other than being less than 17 years old; or less than 14 years old. (See NY Penal Law, §130.60)

Sexual Abuse in the First Degree: When a person subjects another person to sexual contact by forcible compulsion; when the other person is incapable of consent by reason of being physically helpless; or when the other person is less than 11 years old; or when the other person is less than 13 years old, and the actor is 21 years or older. (See NY Penal Law, §130.65)

Aggravated Sexual Abuse: For the purposes of these sections, conduct performed for a valid medical purpose does not violate the provisions of these sections.

Aggravated Sexual Abuse in the Fourth Degree: When a person inserts a foreign object in the vagina, urethra, penis, rectum, or anus of another person and the other person is incapable of consent by reason of some factor other than being less than 17 years old; or inserts a finger in the vagina, urethra, penis, rectum or anus of another person causing physical injury to such person and such person is incapable of consent by reason of some factor other than being less than 17 years old. (See NY Penal Law, §130.65-A)

Aggravated Sexual Abuse in the Third Degree: When a person inserts a foreign object or a finger in the vagina, urethra, penis, rectum, or anus of another person by forcible compulsion or when the other person is incapable of consent

Continued on next page

by reason of being physically helpless; when the other person is less than eleven years old; or when the other person is less than thirteen years old and the actor is eighteen years of age or older. When a person inserts a foreign object in the vagina, urethra, penis, rectum, or anus of another person causing physical injury to such person and such person is incapable of consent by reason of being mentally disabled or mentally incapacitated. (See NY Penal Law, § 130.66)

Aggravated Sexual Abuse in the Second Degree: When a person inserts a finger in the vagina, urethra, penis, rectum, or anus of another person causing physical injury to such person by forcible compulsion; or when the other person is incapable of consent by reason of being physically helpless; or when the other person is less than 11 years old. (See NY Penal Law, §130.67)

Aggravated Sexual Abuse in the First Degree: When a person inserts a foreign object in the vagina, urethra, penis, rectum, or anus of another person by forcible compulsion or when the other person is incapable of consent by reason of being physically helpless; or when the other person is less then eleven years old. (See NY Penal Law, § 130.70)

Stalking in the Fourth Degree: When a person intentionally, and for no legitimate purpose, engages in a course of conduct directed at a specific person, and knows or reasonably should know that such conduct is likely to cause reasonable fear of material harm to the physical health, safety, or property of such person, a member of such person's immediate family, or a third party with whom such person is acquainted; or causes material harm to the mental or emotional health of such person, where such conduct consists of following, telephoning, or initiating communication or contact with such person, a member of such person's immediate family, or a third party with whom such person is acquainted, and the actor was previously clearly informed to cease that conduct; or is likely to cause such person to reasonably fear that his or her employment, business, or career is threatened, where such conduct consists of appearing, telephoning or initiating communication or contact at such person's place of employment or business, and the actor was previously clearly informed to cease that conduct. (See NY Penal Law, § 120.45)

Stalking in the Third Degree: When a person commits the crime of stalking in the fourth degree against three or more persons in three or more separate transactions, for which the actor has not been previously convicted; or commits the crime of stalking in the fourth degree against any person, and has previously been convicted, within the preceding 10 years of a specified predicate crime and the victim of such specified predicate crime is the victim, or an immediate family member of the victim, of the present offense; or with an intent to harass, annoy, or alarm a specific person, intentionally engages in a course of conduct directed at such person which is likely to cause such person to reasonably fear physical injury or serious physical injury, the commission of a sex offense against, or the kidnapping, unlawful imprisonment, or death of such person or a member of such person's immediate family; or commits the crime of stalking in the fourth degree and has previously been convicted within the preceding 10 years of stalking in the fourth degree. (See NY Penal Law, § 120.50)

Stalking in the Second Degree: When a person: commits the crime of stalking in the third degree and in the course of and furtherance of the commission of such offense displays, or possesses and threatens the use of a firearm, pistol, revolver, rifle, shotgun, machine gun, electronic dart gun, electronic stun gun, cane sword, billy, blackjack, bludgeon, plastic knuckles, metal knuckles, chuka stick, sand bag, sandclub, slingshot, slungshot, shuriken, throwing star, dagger, dangerous knife, dirk, razor, stiletto, imitation pistol, dangerous instrument, deadly instrument or deadly weapon; or displays what appears to be a pistol, revolver, rifle, shotgun, machine gun or other firearm; or commits the crime of stalking in the third degree against any person, and has previously been convicted, within the preceding 5 years, of a specified predicate crime, and the victim of such specified predicate crime is the victim, or an immediate family member of the victim, of the present offense; or commits the crime of stalking in the fourth degree and has previously been convicted of stalking in the third degree; or being 21 years of age or older, repeatedly follows a person under the age of fourteen or engages in a course of conduct or repeatedly commits acts over a period of time intentionally placing or attempting to place such person who is under the age of fourteen in reasonable fear of physical injury, serious physical injury, or death; or commits the crime of stalking in the third degree, against 10 or more persons, in 10 or more separate transactions, for which the actor has not been previously convicted. (See NY Penal Law, § 120.55)

Continued on next page

Stalking in the First Degree: When a person commits the crime of stalking in the third degree or stalking in the second degree and, in the course and furtherance thereof, he or she intentionally or recklessly causes physical injury to the victim of such crime. (See NY Penal Law, § 120.60)

Appendix 3: Definitions Relevant to the Stop Campus Hazing Act

The Stop Campus Hazing Act (SCHA) defines "hazing" as follows:

any intentional, knowing, or reckless act committed by a person (whether individually or in concert with other persons) against another person or persons regardless of the willingness of such other person or persons to participate, that—

(I) is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in, a student organization; and

(II) causes or creates a risk, above the reasonable risk encountered in the course of participation in the institution of higher education or the organization (such as the physical preparation necessary for participation in an athletic team), of physical or psychological injury including—

- (A) whipping, beating, striking, electronic shocking, placing of a harmful substance on someone's body, or similar activity;
- (B) causing, coercing, or otherwise inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or other similar activity;
- (C) causing, coercing, or otherwise inducing another person to consume food, liquid, alcohol, drugs, or other substances;
- (D) causing, coercing, or otherwise inducing another person to perform sexual acts;
- (E) any activity that places another person in reasonable fear of bodily harm through the use of threatening words or conduct;
- (F) any activity against another person that includes a criminal violation of local, State, Tribal, or Federal law; and
- (G) any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, State, Tribal, or Federal law.

Under New York law, "[a] person is guilty of hazing in the first degree when, in the course of another person's initiation into or affiliation with any organization, he intentionally or recklessly engages in conduct which creates a substantial risk of physical injury to such other person or a third person and thereby causes such injury." NY Penal Law, § 120.16.

"A person is guilty of hazing in the second degree when, in the course of another person's initiation or affiliation with any organization, he intentionally or recklessly engages in conduct which creates a substantial risk of physical injury to such other person or a third person." NY Penal Law, § 120.17.

Hazing in the first and second degrees are, respectively, a class A misdemeanor and a violation.

Continued on next page

The SCHA defines "Student Organization," as an organization at an institution of higher education (such as a club, society, association, varsity or junior varsity athletic team, club sports team, fraternity, sorority, band, or student government) in which two or more of the members are students enrolled at the institution of higher education, whether or not the organization is established or recognized by the institution.

Appendix 4: Procedures for institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, or stalking

The following procedures are set forth in the NYLS Sexual Misconduct Policy, at pp. 9-22, to address allegations involving, among other offenses, alleged dating violence, domestic violence, sexual assault, and stalking.

Initial Procedure

NYLS has established the following procedures to provide Community Members the opportunity to seek redress from NYLS. These procedures are not intended to replace or replicate a formal judicial process but reflect NYLS's obligations under applicable laws. This initial procedure, the investigation and resolution procedures discussed below, and the sanctioning options and procedures included therein, will supersede any contrary procedure or provision of any other policies included in handbooks and manuals, including the Employee or Student Anti-Discrimination and Anti-Harassment Policy, for the purpose of Sex-Based Misconduct only.

Initial Meeting

As soon as possible upon receipt of a report of potential Sex-Based Misconduct, either directly from the Complainant or through a designated Institution Representative, one or both of the Title IX Co-Coordinators will conduct an initial meeting (the "Initial Meeting") with the Complainant.

At that meeting, the Title IX Co-Coordinators must address the following topics:

- Assess the Complainant's physical safety, and health and emotional needs.
- Notify the Complainant of the Students' Bill of Rights. See Sexual Misconduct Policy, Appendix A, Students' Bill of Rights.
- Notify the Complainant of the Complainant's right to report or not report the incident to law enforcement, and to the extent practicable, assist the Complainant with locating criminal justice resources.
- Discuss NYLS's resolution processes.
- Notify the Complainant that their written consent is required to reveal certain Personally Identifiable Information (see Sexual Misconduct Policy, Section 13), but that complete confidentiality may not be possible if NYLS is to remedy the complaint.
- If requested, assist the Complainant with ensuring access to a sexual assault forensic examination; obtaining an Order of Protection, or equivalent restraining order; and contacting and assisting local law enforcement if an Order of Protection is violated.
- Provide the Complainant with information about on- and off-campus support and reporting resources, including counseling, health care, mental health assistance, victim advocacy, legal assistance, and other available services.

Continued on next page

- Provide the Complainant with information about the on-campus and off-campus resolution procedures, including the reporting process, interim remedies, the informal and formal resolution options, and other measures that can be taken regardless of whether the Complainant wishes to file a formal report with NYLS.
- Explain NYLS's policies regarding retaliation and amnesty for substance abuse.
- Explain mandated reporting requirements (including Clery Act requirements).
- The availability of, and the Complainant's preference for, supportive measures (detailed herein).

Formal Complaint Determination

Based on the Initial Meeting, the Title IX Co-Coordinators may choose to dismiss the report if it is determined that the conduct alleged, even if proven, would not constitute discrimination under Title IX. Prior to dismissing the report after attending an initial meeting, the Title IX Co-Coordinators must make reasonable efforts to clarify the allegations made by the Complainant. Upon dismissing the report, the Title IX Co-Coordinators will send a written notice of dismissal, which will contain the Title IX Co-Coordinators' reasons, to the Complainant. The Complainant shall have the right to appeal from the Title IX Co-Coordinators' decision to dismiss the report or any allegation therein pursuant to Sexual Misconduct Policy, Section 7, Appeal.

If the Title IX Co-Coordinators believe the conduct described in the report following the initial meeting could, if proven, constitute a violation of Title IX, they will seek permission from the Complainant to make a formal complaint ("Formal Complaint"). The Formal Complaint must be filed by the Complainant or signed by the Title IX Co-Coordinators and must request that NYLS investigate the Formal Complaint. Permission for a Formal Complaint may be given initially but can be withdrawn at any time.

NYLS respects Complainants' wishes and autonomy by giving them the clear choice to file a Formal Complaint. Such decision will not impact a Complainant's ability to access supportive measures, as described below. If a Complainant declines to make a Formal Complaint, requests that the report remain confidential, and/or later withdraws permission for the Formal Complaint, the Title IX Co-Coordinators have the authority to proceed with an investigation if they determine that a failure to investigate does not adequately mitigate a potential risk of harm in the NYLS community.

To make this determination, the Title IX Co-Coordinators will weigh the request against the Law School's obligation to provide a safe, non-discriminatory environment for all members of its community. Factors that the Title IX Co-Coordinators **must** consider in determining whether to proceed against the Complainant's wishes are: the Complainant's request not to proceed with initiation of a Formal Complaint; the Complainant's reasonable safety concerns regarding initiation of a Formal Complaint; the risk that additional acts of Sex-Based Misconduct would occur if a Formal Complaint is not initiated; the severity of the alleged Sex-Based Misconduct, including whether the misconduct, if established, would require the removal of a Respondent from campus or imposition of another disciplinary sanction to end the discrimination and prevent its recurrence; the age and relationship of the parties, including whether the Respondent is an employee of NYLS; the scope of the alleged Sex-Based Misconduct, including information suggesting a pattern, ongoing sex discrimination, or sex discrimination alleged to have impacted multiple individuals; the availability of evidence to assist a decisionmaker in determining whether Sex-Based Misconduct occurred; and whether NYLS could end the alleged Sex-Based Misconduct and prevent its recurrence without initiating its Grievance Process. Factors that the Title IX Co-Coordinators **may** consider in determining whether to proceed against the Complainant's wishes include, but are not limited to: the accused's history of violent or similar behavior; escalation of previous behavior; risk that the accused will commit additional acts of violence; use of a weapon or force; involvement of a minor; whether the Law School possesses other means to obtain evidence such as security footage, and whether available information reveals a pattern of perpetration at a given location or by a particular

Continued on next page

group. If the Complainant declines to make a Formal Complaint, the Title IX Co-Coordinators may still be required to make certain disclosures pursuant to applicable law. See Sexual Misconduct Policy, Section 11, Required Disclosures. If NYLS determines that it must investigate the report despite the Complainant's wishes not to file a Formal Complaint, it shall notify the Complainant and take necessary actions to protect and assist the Complainant.

If the Complainant permits a Formal Complaint to be filed or if the Title IX Co-Coordinators determine that proceeding with resolution procedures is necessary despite the lack of a formal complaint, the Title IX Co-Coordinators will proceed with the Law School's resolution procedures as described below. The succeeding process will be fair and impartial, and neither NYLS, nor any of its agents, will coerce or threaten a Complainant into filing a Formal Complaint. The Title IX Co-Coordinators may consolidate complaints of sex discrimination against more than one respondent, or by more than one complainant against one or more respondents, or by one party against another party, when the allegations of sex discrimination arise out of the same facts or circumstances.

Supportive Measures

Regardless of whether the Complainant desires to file a Formal Complaint, NYLS will offer free supportive measures to every alleged victim and alleged offender ("Respondent," and together with Complainant, the "Parties," or, individually "Party") of Sex-Based Misconduct. Such supportive measures are individualized services that are non-punitive, non-disciplinary, and not unreasonably burdensome to the other Party, while designed to restore or preserve a Party's access to the school's education program or activity, ensure equal access to education and employment opportunities, protect safety, and deter Sex-Based Misconduct. These measures will be available regardless of whether the alleged victim wishes to proceed in an Informal or Formal Resolution, or whether the Respondent participates in same. Complainants and Respondents will have a say in NYLS's supportive measures to ensure that they best meets their needs.

Advisor Information and Guidelines

Any individual being interviewed by the Investigators, including the Complainant and Respondent, has the right to be accompanied to any meeting or proceeding related to this resolution procedure by an advisor of their choice ("Advisor"). An Advisor is an individual who attends as a supportive presence. An Advisor may take notes and quietly confer with the individual being advised but may not speak on behalf of the individual or in any way disrupt any meeting or the resolution procedure, unless otherwise allowed as described herein. Individuals who may have factual information relevant to the Formal Complaint may not serve as Advisors. If an individual being interviewed wishes to have an attorney serve as their Advisor, they may retain counsel independently. Attorney-Advisors may participate in the resolution procedure to the same extent as other Advisors. If a Party does not have an Advisor present at the live hearing, NYLS will provide one, without fee or charge. Although the Parties are not required to choose an Advisor or to bring their Advisor to all meetings, utilizing the same Advisor throughout the process, unless there are extenuating circumstances, allows the process to move forward in the most efficient fashion. In the event that a Party wants to make a change to their Advisor, they must provide written notice to the Title IX Co-Coordinators. Although reasonable attempts will be made to schedule proceedings consistent with an Advisor's availability, the process will not be delayed to schedule the proceedings at the convenience of the Advisor. If an Advisor fails to comply with the procedures set forth herein, including through a material breach of confidentiality or an improper disclosure of Personally Identifiable Information, NYLS reserves the right to exclude the Advisor from further participation in the process.

Continued on next page

Interim Measures Pending Resolution of the Formal Complaint

The Dean, in coordination with the Title IX Co-Coordinators, may take action to deal with situations of an emergency nature posing a threat to the safety or health of the Law School community or the integrity of its programs. Such emergency action may include suspension of a student, faculty member, or staff member for a period of time deemed appropriate by the Dean. The Dean will determine whether and which emergency action is required, and they shall inform the Title IX Co-Coordinators, who shall then proceed according to the provisions of the Sexual Misconduct Policy. Based upon the nature of the Formal Complaint, NYLS may impose immediate temporary restrictions ("Interim Measures") after a Formal Complaint has been made, including, but not limited to:

Students

- Assistance with housing relocation
- Changes in work schedule
- Changing or modifying schedules
- Interim suspension
- Leave of absence
- No contact orders
- Other campus access restrictions
- Providing academic services (including tutoring)
- Providing alternate course completion options
- Providing an escort to ensure safe movement on campus
- Any other remedy that can be tailored to the individuals and which reasonably helps to achieve the goals of this policy.

Graduates

- No contact orders
- Other campus access restrictions
- Providing an escort to ensure safe movement on campus
- Any other remedy that can be tailored to the individuals and which reasonably helps to achieve the goals of this policy.

Faculty/Staff/Employees

- Changing or modifying work or teaching schedules
- Interim suspension
- Leave of absence
- No contact orders
- Other campus access restrictions
- Providing an escort to ensure safe movement on campus
- Any other remedy that can be tailored to the individuals and which reasonably helps to achieve the goals of this policy.

Requests for specific Interim Measures may be discussed with the Title IX Co-Coordinators and/or the Dean, but remain at the sole discretion of NYLS. The Title IX Co-Coordinators may recommend to the Dean specific Interim Measures based on

Continued on next page

the Parties' relationship with NYLS, the factual circumstances surrounding the Formal Complaint, any measures requested by either Party, and any other factors that the Title IX Co-Coordinators determine are relevant. The Title IX Co-Coordinators will notify each Party in writing of any Interim Measure to be imposed. Both the Respondent and Complainant (or alleged victim, if different from the Complainant) may request an institutional review of the need for and terms of any Interim Measure or modification that directly affects them, and to submit evidence in support of or in opposition to such Interim Measures. With respect to Interim Suspensions, both the Respondent and Complainant shall be given the opportunity, upon request, for an institutional review of the need for and terms of an interim suspension, and to submit evidence in support of such request. With respect to No Contact Orders, should the situation warrant, such orders shall require that the Respondent leave a public area if in the same area as a Complainant, without contacting the Complainant. Both the Respondent and the Complainant shall be given the opportunity, upon request, to seek a prompt institutional review of the need for and terms of a No Contact Order, and to submit evidence in support of such request.

If requested, NYLS can assist the individual with filing a police report, ensuring access to a sexual assault forensic examination, obtaining an Order of Protection or equivalent restraining order; and contacting and assisting local law enforcement if an Order of Protection is violated. Individuals who are the subject of an Order of Protection shall have an opportunity to (1) receive a copy of the order of protection when received by the Law School; (2) meet or speak with a Law School representative, or other appropriate individual, who can explain the order and answer questions about it, including information from the order about the accused's responsibility to stay away from the protected person or persons; and (3) receive an explanation of the consequences for violating these orders, including but not limited to arrest, additional conduct charges, and interim suspension. While NYLS may explain such an order and its practical impact, the Law School cannot provide legal advice to individuals who are the subject of an Order of Protection under this Policy.

Interim Measures imposed on the Respondent are not determinations of guilt. Failure to adhere to the parameters of any Interim Measures is a violation of the NYLS Code of Academic Responsibility and may lead to additional disciplinary action.

Non-student respondents who present a continuing threat to the health and safety of the community shall be subject to Interim Measures in accordance with applicable collective bargaining agreements and other rules and policies of the Law School.

Resolution of the Formal Complaint

Investigation Process

NYLS is obligated to investigate all Formal Complaints. At all points up until a final determination, there is a presumption of innocence for the Respondent. At all times during the Grievance Procedures (as defined herein), the burden of gathering evidence and the burden of proof remains on NYLS.

1. Notification of Investigation

The Title IX Co-Coordinators shall concurrently notify the Parties of the decision to proceed with the Formal Complaint in writing within two business days of the Initial Meeting (the "Notification of Investigation"). The Notification of Investigation must contain: a brief description of the factual allegations (identities of the parties involved in the incident, if known, the conduct allegedly constituting the violation of the Policy, including a reference to the specific provisions of a Law School policy or code of conduct alleged to have been violated, and in what manner, and possible sanctions); the approximate date, time and location of the alleged violation, if known; notice of NYLS's Complaint Reporting, Investigation, Hearing, and Corrective Action process ("Grievance Process"); a statement that the Respondent is presumed not responsible for the alleged conduct, that a determination regarding responsibility is made at the conclusion

Continued on next page

of the Grievance Process, and that the Respondent may be entitled to supportive measures (as described above); a statement informing the Parties and their Advisors of their rights to inspect and review inculpatory and exculpatory evidence; a statement that retaliation is prohibited; and notice to the Parties of any provision of any NYLS policy that prohibits knowingly making false statements or knowingly submitting false information during the Grievance Process. If NYLS expands the scope of its investigation at any point, it will provide written notice of the additional allegations. The Notification of Investigation shall inform the Parties of their right to bring an Advisor to meetings; state that if either Party wishes to have an attorney serve as an Advisor, they may retain counsel independently; and include the language in Section 5.D of the Sexual Misconduct Policy, Advisor Information and Guidelines. The Notification of Investigation shall further state that behavior that violates this Policy may also violate criminal law and that either Party may seek advice from independently retained legal counsel. The Title IX Co-Coordinators should attempt to meet with the Respondent within three business days from the date of the Notification of Investigation to provide the Respondent with the Students' Bill of Rights and other similar procedural and resource information as was provided to the Complainant during the Initial Meeting, and to answer any of the Respondent's procedural questions. If the Respondent is unable to meet or does not respond to the Title IX Co-Coordinators within three business days, the Title IX Co-Coordinators will mail or email the Respondent the required information.

2. Prohibition Against Conflicts of Interest

The Title IX Co-Coordinators, all Investigators (as defined below), and the members of the Title IX Board must be impartial. Within three business days from the date of the Notification of Investigation, either Party may object, in writing, to anyone's involvement based on a real or perceived bias or a conflict of interest. The Title IX Co-Coordinators will refer the objection to the Board to determine whether the allegation of bias or conflict is sustained (or, in the case of an allegation of bias or conflict of interest on behalf of a member of the Board, the Title IX Co-Coordinators will make this determination). The Title IX Co-Coordinators, all Investigators, and the members of the Board may also voluntarily recuse themselves at any point in the process if it appears that they may have a real or perceived conflict of interest. If they voluntarily recuse themselves, or if the Title IX Co-Coordinators or Board determines that someone has a real or perceived bias or conflict, that individual will be recused from the individual's responsibilities for the Formal Complaint in question and be replaced by the Senior Associate Dean for Academic Affairs for the remainder of the Grievance Process. Further, all complaints shall be investigated and adjudicated by individuals who receive annual training in such investigations, the effects of trauma, and the rights of the Respondent, or by similarly-qualified or experienced external investigators.

3. Informal Resolution

Recognizing that a wide spectrum of behaviors can constitute violations of this Policy, the Title IX Co-Coordinators may, at any time prior to the Report and Decision (described herein), offer Informal Resolution, such as mediation, in appropriate circumstances, that does not require a full investigation and adjudication for Sex-Based Misconduct. Informal Resolution is not available if such a process would conflict with federal, state, or local law. Prior to initiating the Informal Resolution process, the Title IX Co-Coordinators will provide to both Parties a written notice disclosing: the allegations; the requirements of the Informal Resolution process including the circumstances under which it precludes the Parties from resuming a Formal Complaint arising from the same allegation; that any Party has the right to withdraw from Informal Resolution at any time; the potential terms that may be requested or offered during Informal Resolution, including notice that any agreement reached during Informal Resolution will be binding only on the Parties; and any consequences resulting from participating in the Informal Resolution process, including the records that will be maintained or could be shared. Participation in the Informal Resolution process is entirely voluntary. All Parties must agree to use the Informal Resolution process through voluntary, informed, written consent. If appropriate and agreed to by all Parties, the Title IX Co-Coordinators will initiate the Informal Resolution process within five business days from the date of the Parties' agreement (i.e., the last date on which any Party indicates the Party's agreement). The nature of Informal Resolution is

Continued on next page

flexible, but in general, the Parties meet together with the Title IX Co-Coordinators or another trained designated mediator to discuss the incident(s) that led to the Formal Complaint and potential resolutions. While fault is not determined in the Informal Resolution process, the goal of Informal Resolution is for the Parties to agree on a solution or resolution together. Such resolutions may include a permanent no-contact order, academic reassignment, a written apology, community service, or other alternate resolutions. Any agreement between the Parties will be reduced to writing and signed by both Parties. If the Title IX Co-Coordinators and the Parties reach agreement, the matter will be closed. The Informal Resolution procedure must conclude within 15 business days from the date of the Parties' written consent to the Informal Resolution process, unless all Parties, including the Title IX Co-Coordinators, agree to an extension of time. After the time for Informal Resolution has expired, including any agreed-upon extensions, the Title IX Co-Coordinators shall initiate an Investigation (see below) regarding any unresolved allegations in the Formal Complaint.

Any Party, including the Title IX Co-Coordinators, may elect to end Informal Resolution and proceed to the next step of the Grievance Process at any time prior to agreeing to a resolution during the Informal Resolution process. If Informal Resolution is ended by request or because the time for Informal Resolution expires, and the next step is initiated, any information obtained during Informal Resolution may be used in the subsequent process.

4. Formal Resolution: Investigation Procedure

Within five business days from the Notice of Investigation, the Title IX Co-Coordinators will appoint a two-person investigative team ("Investigators"). The Title IX Co-Coordinators can serve as the Investigators, select the Investigators from faculty trained on Title IX Investigations, or may retain experienced external investigators to conduct the investigation. All Investigators must be trained on Title IX. The goal of the Investigators is to conduct a thorough investigation of the allegations in the Formal Complaint to determine whether any conduct alleged in the Formal Complaint warrants moving forward to the Board (the "Investigation"). The Investigation must include interviewing the Complainant and Respondent; it may also include interviewing other relevant witnesses or individuals with relevant information, including witnesses identified or requested by the Complainant and Respondent. All Parties will have an equal opportunity to offer witnesses and other evidence during the investigation, and to present evidence and testimony at a hearing (if a Hearing is required as provided for herein), and have access to a full and fair record of any such hearing, which shall be preserved and maintained for at least seven years from such a hearing and may include a transcript, recording or other appropriate record. The Investigators will interview the Complainant, the Respondent, and any witnesses in separate, private sessions. The Investigators will provide the Parties and witnesses with reasonable written or electronic notice of any and all meetings, interviews, or hearings that require their attendance, which will include the date, time, location, participants, and purpose.

The Investigators shall have access to all potentially relevant documents, whether inculpatory or exculpatory. The Investigators will request and review any relevant evidence such as emails, text messages, videos, and photographs. The Investigators may also choose to interview witnesses not identified by the Parties, or to request relevant evidence that was not presented to them. The Parties must cooperate with the Investigators by providing any additional information that the Investigators may request, however, Parties have the right to request that the Investigators exclude from evidence their own prior sexual history with persons other than the other party, or their own mental health diagnosis and/or treatment. The Investigators must not request, and the Parties have no obligation to provide, evidence protected under a privilege recognized by federal or state law unless such privilege is waived, medical records of any Party or witness unless expressly granted permission in writing, or evidence relating to a Complainant's sexual interests or prior sexual conduct unless it is offered to prove someone other than the Respondent committed the alleged conduct or is evidence about specific incidents that demonstrate consent to the alleged misconduct.

The Title IX Co-Coordinators may redact sensitive information that is not directly relevant to the questions raised in the Investigation. Neither Party is prohibited from discussing or sharing information relating to the Formal Complaint with others who may support them or assist them in the matter, however, they must make reasonable steps to protect

Continued on next page

the privacy of the Parties and witnesses involved during the pendency of the investigation. The Investigation must be concluded within 20 business days from the date of the Notification of Investigation. The Title IX Co-Coordinators may grant a reasonable extension of time upon request from the Investigators. The Investigators should periodically check in with the Title IX Co-Coordinators during the course of the Investigation to update the Title IX Co-Coordinators on the progress of the Investigation.

5. Inspect and Review Evidence Collected and Investigation Report

Within five business days following the conclusion of the Investigation, the Investigators will provide both Parties and their Advisors an equal opportunity to inspect and review the preliminary investigation report and any evidence obtained as part of the Investigation that is directly related to the allegations raised in the Formal Complaint, including the evidence upon which NYLS does not intend to rely in reaching a determination regarding responsibility, and inculpatory or exculpatory evidence whether obtained from a Party or other source. The Parties will have 10 business days to submit a written response to NYLS, which the Investigator will consider prior to the finalization of the investigation report ("Investigation Report").

Within 10 business days of receiving, reviewing and considering the Parties' written response, the Investigators will finalize the Investigation Report, which will fairly summarize the relevant evidence. At least 10 business days prior to the Hearing (if a Hearing is required as provided for herein), the Investigator will send to each Party and their Advisors the finalized Investigation Report, in electronic format or hard copy, for their review and written response. The final Investigation Report, and any written responses, will be kept in the Investigation File.

6. Dismissal of the Formal Complaint

At the conclusion of the Investigation, and after the Parties have been given the opportunity to respond to the final Investigation Report, the Title IX Co-Coordinators must dismiss the Formal Complaint if the conduct alleged, even if proved, would not constitute Sexual Harassment (as defined in 34 C.F.R. § 106.30 of the Title IX Final Regulations); did not occur in NYLS's education program or activity; or did not occur against a person in the United States. They may dismiss the Formal Complaint, or any of the allegations therein, if the Complainant notifies the Title IX Co-Coordinators in writing that they would like to withdraw the Formal Complaint or any allegations therein; if the Respondent is no longer enrolled or employed by NYLS or cannot be identified and continuing the hearing process would not be able to provide the Complainant with any additional relief; or if specific circumstances prevent NYLS from gathering evidence sufficient to reach a determination as to the Formal Complaint or any allegations therein. Note that the conduct may be in violation of other NYLS policies and may be reviewed and/or investigated under their respective, separate protocols. Upon dismissing the Formal Complaint, the Title IX Co-Coordinators will promptly send a written notice of dismissal, which will contain the Title IX Co-Coordinator's reasons, simultaneously to the Complainant and the Respondent. Either Party has the right to appeal from the Title IX Co-Coordinators' decision to dismiss the Formal Complaint or any allegation therein pursuant to Sexual Misconduct Policy, Section 7, Appeal.

Hearing Process

1.The Hearing

If the Title IX Co-Coordinators do not dismiss the Formal Complaint, the Title IX Co-Coordinators shall send the Formal Complaint to a Hearing in front of the Board ("Hearing"). The Board must select a date for such Hearing (which must be at least 10 days after the Parties receive the finalized Investigation Report). The Title IX Co-Coordinators will simultaneously notify each Party (in person, by mail, or by email) within one business day that a Hearing is being convened and the date of the Hearing. In preparation for the Hearing, the Board will receive a copy of the Investigation Report and the Parties' responses to the Investigation Report, if any.

Continued on next page

Any witness, including the Complainant and Respondent, has the right to be accompanied to the Hearing by an Advisor of their choice (see Sexual Misconduct Policy, Section 5.D, Advisor Information and Guidelines). In any Hearing before the Board, the Board may question the Parties and other witnesses, and may request and/or accept evidence. All Parties will have an equal opportunity to offer witnesses and other evidence. The Parties are allowed to cross-examine each other and each Party's witness; however, only Advisors will be allowed to ask these questions through cross-examination. The cross-examination can include questions challenging credibility, but it must be oral and in real-time. If a Party does not have an Advisor present at the live hearing, NYLS will offer to provide one, without fee or charge. This Advisor may, but is not required to be, an attorney. This Advisor has the same right to conduct a cross-examination. No Advisor may serve as a witness. The Board will arrange for an audio, audiovisual recording, or transcript of the Hearing to be created; no other individual may record the Hearing. To the extent practicable, the Hearing should be held in one business day.

Prior to the answer of any question, the Board must first determine whether the question is relevant and explain to the Advisor any decision to exclude a question as not relevant. Questions and evidence about a Complainant's prior sexual behavior are deemed irrelevant, unless they are offered to prove that someone other than the Respondent committed the alleged Sex-Based Misconduct or offered to prove Consent.

If a Party or witness does not submit to cross-examination at the live hearing, the Board cannot rely on any statement of that Party or witness in reaching a determination of responsibility. However, the Board cannot draw an inference about the determination of responsibility based solely on a Party's or witness's absence from the live hearing or refusal to answer a question.

The Board will use its best efforts to ensure the appearance of witnesses and the production of documents relevant to any matter before it. NYLS will cooperate with the Board and will use sanctions at its disposal in ensuring the appearance of witnesses and the production of documents in all proceedings before the Board.

Hearings are closed to the public. Witnesses (other than the Complainant, the Respondent, and their Advisors, as discussed below) are not permitted to observe the Hearing before or after their questioning, but will be able to see all participants during their testimony. The Title IX Co-Coordinators may remove any individual from the Hearing who is disrupting the proceeding or is not abiding by the rules of the Hearing.

The Complainant and Respondent (and their Advisors) may, if they choose, observe the proceeding; neither Party is required to be present for the hearing, other than to provide relevant testimony. Upon timely request by either Party, the Title IX Co-Coordinators may, in their discretion, accommodate concerns for a Party's personal safety, well-being, and/or fears of confrontation during the Hearing by permitting the use of available technology to conduct the hearing while allowing the Complainant and Respondent to be in separate rooms.

2. The Board's Determination

At the conclusion of the Hearing, the Board will deliberate in private to determine if there was a violation of this Policy. The Board will consider all relevant evidence, including the Investigators' Report and the events of the live hearing in making its objective determination. The Board's deliberations will not be recorded. The Board shall determine whether a violation of this Policy occurred under the "preponderance of the evidence" standard. Under this standard, it must be more likely than not that a violation of the Policy occurred. Based on this standard, the Board may find the Respondent responsible for a violation of this Policy or not responsible, based on a majority vote. After deliberations, the Board shall prepare a written determination regarding responsibility (the "Report and Decision"). The Report and Decision will include: identification of the allegations potentially constituting a violation of this Policy; a description of the procedural steps taken from the receipt of the Formal Complaint through the determination, including any notifications to the Parties, interviews with the Parties or witnesses, site visits, methods used to gather other evidence, and hearings held; findings of fact supporting the determination; a statement of, and rationale for, the result as to each allegation, including a

Continued on next page

determination regarding responsibility, any disciplinary sanctions NYLS imposes on the Respondent; whether remedies designed to restore or preserve equal access to NYLS's education program or activity will be provided by NYLS to the Complainant; and NYLS's procedures and permissible bases for the Complainant and Respondent to appeal. Whether or not the Board determines that a violation occurred, the Title IX Co-Coordinators, within one business day of the date of the Report and Decision, must deliver the Report and Decision to the Parties simultaneously, either in person, by mail, or by email. If there is a finding that the Respondent violated the policy, the Board will determine sanctions or remedies consistent with Sexual Misconduct Policy, Section 8. The Board's determination regarding responsibility becomes final either on the date that NYLS provides the Parties with the written determination of the result of the appeal, if an appeal is filed, or if an appeal is not filed, the date on which an appeal would no longer be considered timely.

3. Investigation File

The Investigation File will be comprised of the Formal Complaint, the Investigators' Report, the Parties' written responses, if any, any interview notes or evidence considered by the Board in making its determination, any recording of the Hearing (if applicable), the Report and Decision (if applicable), any materials regarding an appeal, as described below (if applicable), and all materials required to be in the Investigation File pursuant to prior sections. The Title IX Co-Coordinators will maintain the Investigation File. The Title IX Co-Coordinators may redact sensitive information that is not directly relevant to the questions raised in the Investigation or Hearing, or may reflect Personally Identifiable Information which NYLS is not permitted to disclose. Upon request, the Parties and their Advisors may review the Investigation File. Given the sensitive nature of this information, the Title IX Co-Coordinators will provide this information in a secure manner (e.g., by providing a hard copy to be reviewed in a location designated by the Title IX Co-Coordinators). The Investigation File will be kept for at least seven years.

Appeal

Both Complainant and Respondent have a limited right to appeal from the Title IX Co-Coordinators' decision to dismiss the Formal Complaint or the Board's final determination ("Appeal"). Either Party may submit a written appeal to the Title IX Co-Coordinators within 10 business days of the date of the Title IX Co-Coordinators' decision to dismiss the Formal Complaint or the Board's issuance of the Report and Decision. An Appeal shall be based only on: procedural irregularity that affected the outcome of the matter; the discovery of new, relevant evidence that was not available during the Grievance Process and which could affect the outcome of the case; and/or that the Title IX Co-Coordinators, Investigators, and/or Board had a conflict of interest or bias that affected the outcome of the matter.

The Party who submits the appeal will be the "Appellant" and the other Party will be the "Appellee." Upon receiving an Appeal, the Title IX Co-Coordinators shall, within three business days of receiving the Appeal, convene an Appeal Panel to review the appeal. The Appeal Panel will consist of three administrators who oversee the Law School's academics, administration and/or operations (i.e., Senior Associate Dean for Academic Affairs, Senior Vice President, and Chief Financial Officer). Members of the Board, the Investigators, the Title IX Co-Coordinator may not serve on the Appeal Panel. Both Parties will have three business days to object to any member of the Appeal Panel based on a real or perceived bias or conflict of interest. If an objection is sustained, the Title IX Co-Coordinators shall replace any member of the Appeal Panel determined to have such a conflict of interest or bias with another similarly situated individual. Both Parties will have five business days from the submission of an Appeal to submit a written response in support of, or challenging, the particular outcome. Appeals are not intended to be a full rehearing of the Formal Complaint. The Appeal Panel will have the opportunity to review the Investigation File. The appealed determinations are presumed to have been decided reasonably and appropriately. The Appellant carries the burden of proof to demonstrate that the original determination, or any of its components per the above, were improper. The Appeal Panel shall determine, by a simple majority vote, whether it believes a violation of the Policy occurred.

Continued on next page

Within 10 business days of receipt of all written statements and conducting its review, the Appeal Panel will issue a written decision describing the result of the Appeal and the rationale for the result (the "Appeal Decision"). The Appeal Decision is final and is not subject to further appeal. A copy of the Appeal Decision will be provided to the Parties simultaneously, sent to the Title IX Co-Coordinators and made a part of the Investigation File.

Sanctions and Remedies

In addition to taking disciplinary action against the Respondent per the Report and Decision, or the Appeal Decision, effective corrective action may require alternative remedies for the Complainant and/or Respondent. NYLS may take continuing steps to ensure that it is meeting the needs of the Complainant, preventing the recurrence of Sex-Based Misconduct, and remedying the effects of any Sex-Based Misconduct by, for example, issuing a permanent no contact order, providing continuing access to counseling services, and any other appropriate ongoing remedies, including but not limited to the remedies discussed in the Sexual Misconduct Policy, Section 5.E, Interim Measures.

If the Respondent is found to have violated the Sexual Misconduct Policy, NYLS will issue sanctions commensurate with the violation(s). The Title IX Board will oversee the sanctioning process. Either or both Parties may submit a statement regarding their view of the appropriate sanction or remedy ("Impact Statement") to the Board within five business days of notification of the Report and Decision or Appeal Decision. Impact Statements will become part of the Investigation File and will be maintained by the Title IX Co-Coordinators. The Board will review the Investigation File, including any Impact Statements, in assessing the appropriate sanction, and will make a determination regarding the appropriate sanction within three days after the time to submit Impact Statements has expired.

The Board has the discretion to implement a variety of sanctions consistent with the severity of the violation, the Respondent's prior history, the Respondent's role within NYLS, and sanctions assigned to other individuals with similar violations. Past findings of domestic violence, dating violence, stalking, or sexual abuse may be considered when evaluating sanctions.

The Respondent must be informed in writing of the sanction and the rationale for the sanction within one business day of the sanction determination. The Complainant will concurrently be informed in writing of the finalization of the sanctioning process, and, to the extent that such disclosure would be reasonable and permissible, will be informed of the final sanction.

Students

All sanctions as to students will be noted in the student's academic file, along with a concise written statement as to the circumstances. The statement shall be written by the Dean of the Law School. Such file notation shall include an indication as to whether the statement should be made available to employers, employment screening groups, and similar entities in the future. Should the Respondent seek admission to a bar of any jurisdiction, information about proceedings or sanctions under this policy will be reported to the appropriate committee of that jurisdiction in accordance with the jurisdiction's requirements. Certain sanctions for students may also be subject to transcript notation. See Sexual Misconduct Policy, Section 8.G.

Any current or future student found to have violated the Sexual Misconduct Policy may also be required to complete non-disciplinary, educational initiatives designed to educate the student. Sanctions for students may include, but are not limited to, one or more of the following:

- Warning, with appropriate documentation of the circumstances
- Restitution
- Probation, for a time certain, with terms and conditions set forth by the Board as to termination of probation

Continued on next page

- Suspension, for a time certain
- Revocation of admission (if the individual is an admitted student)
- Removal from a journal or other student organization, or from a leadership position within such organization
- Revocation or non-renewal of credits for participation in a journal or other student organization
- Expulsion, with or without terms and conditions as to any application for re-admission
- Withholding of degree.

Graduates

Sanctions for graduates may include, but are not limited to, one or more of the following:

- Warning
- Restitution
- Revocation of degree
- Persona non grata order
- In the case of a graduate not yet admitted to practice, the Law School may withhold certification of the student to the appropriate bar admission entity
- In the case of a graduate already admitted to practice, the Law School may notify the appropriate bar disciplinary entity of the proceeding outcome.

Staff, Independent Contractors, Visitors, and Other Individuals

All sanctions as to staff will be noted in the employee's file, along with a concise written statement as to the circumstances. The statement will be written by the Dean of the Law School. Such notation shall include an indication as to whether the statement should be made available to future employers and the like, and as to whether such notation shall be expunged at a specified later date. Sanctions for staff, independent contractors, visitors, and other individuals may include, but are not limited to, one or more of the following (consistent with state and local law, collective bargaining agreement and any other existing contract):

- Warning, with appropriate documentation of the circumstances
- Restitution
- Suspension, with or without pay, for a time certain
- Probation, for a time certain, with terms and conditions set forth by the Board as to termination of probation
- Denial or limitation of future increases in salary, benefits, perquisites, and the like, upon specified terms and conditions
- Reduction in grade or position
- Transfer to another position
- Termination of employment
- Persona non grata order.

Non-Tenured and Non-Long-Term Contract Faculty

All sanctions as to non-tenured faculty will be noted in the faculty member's file, along with a concise written statement as to the circumstances. The statement will be written by the Dean of the Law School. Such notation shall include an

Continued on next page

indication as to whether the statement should be made available to future employers and the like, and as to whether such notation shall be expunged at a specified later date.

Sanctions for non-tenured and non-long-term contract faculty may include, but are not limited to, one or more of the following (consistent with state law and any existing contract with the faculty member):

- Warning, with appropriate documentation of the circumstances
- Restitution
- Suspension, with or without pay, for a time certain, under stated terms and conditions
- Probation, for a time certain, with terms and conditions set forth by the Board as to termination of probation
- Denial or limitation of future increases in salary, benefits, perquisites, courses, summer teaching assignments, research grants, and the like, upon specified terms and conditions
- Reduction in position
- Termination of employment.

Tenured and Long-Term Contract Faculty

All sanctions as to tenured and long-term contract faculty will be noted in the faculty member's file, along with a concise written statement as to the circumstances. The statement will be written by the Dean of the Law School. Such notation shall include an indication as to whether the statement should be made available to future employers and the like, and as to whether such notation shall be expunged at a specified later date.

Sanctions for tenured and long-term contract faculty may include, but are not limited to, one or more of the following (consistent with state law and any existing contract with the faculty member):

- Warning, with appropriate documentation of the circumstances
- Restitution
- Suspension, with or without pay, for a time certain, under stated terms and conditions, to the extent permissible under the Standards and Procedures for Tenure, Promotion and Reappointment ("Tenure Rules")
- Probation, for a time certain, with terms and conditions set forth by the Board as to termination of probation, to the extent permissible under the Tenure Rules
- Reduction in grade or position, to the extent permissible under the Tenure Rules
- Denial or limitation of future increases in salary, benefits, perquisites, courses, summer teaching assignments, research grants, and the like, upon specified terms and conditions
- Termination of employment, to the extent permissible under the Tenure Rules. In such cases, the Board shall recommend to the Law School that it commence a proceeding pursuant to Article IX of the Tenure Rules.

Failure to Comply with Investigation or Sanctions

If an individual fails to comply with the procedures in the Sexual Misconduct Policy, including through a material breach of confidentiality, improper disclosure of Personally Identifiable Information, or by a refusal to abide fully with any assigned sanctions, NYLS reserves the right to bring additional charges of misconduct against the individual. The Title IX Co-Coordinators are responsible for interpreting and applying this provision.

Continued on next page

Transcript Notation Requirement and Appeal Procedure

Students suspended or expelled for committing an act of sexual assault, domestic violence, dating violence, stalking or a "violent crime," as defined by the Clery Act, will have a notation placed on their transcript as follows: "suspended after a finding of responsibility for a code of conduct violation" or "expelled after a finding of responsibility for a code of conduct violation." A transcript notation will not be removed prior to one year after conclusion of the suspension. Expulsion notations will not be removed in any case. If a finding of responsibility is later vacated for any reason, a corresponding transcript notation will be removed.

If a student who has been charged with a violation withdraws from NYLS while charges are pending and declines to complete the disciplinary process, the following notation will be placed on the student's transcript: "withdrew with conduct charges pending."

Suspension and expulsion transcript notations are applied at the conclusion of the conduct proceedings and appeals processes. If a student withdraws with charges pending, but conduct proceedings are nonetheless completed, any final transcript notation will be based on the outcome of those proceedings. A student who withdraws from NYLS prior to an outcome of a pending conduct case should understand that the investigation and proceeding may continue, even without their participation. Pending completion of those proceedings, the transcript will carry the above withdrawal notation.

Transcript notations for a suspended student are required by law to remain on the transcript for a period of at least one year following completion of the suspension. By law, expulsion notations are not subject to removal. By NYLS policy, a withdrawal notation will remain on a transcript for at least one year following the withdrawal. Subject to these minimum periods, a student may request to have a suspension/withdrawal transcript notation removed by submitting a petition in writing to the Title IX Co-Coordinators, who will share the request with the Dean. The petition must contain the rationale for requesting removal of the notation and documentation of the successful completion of any terms imposed in the underlying conduct proceeding.

The Title IX Co-Coordinators and the Dean will make all decisions about notation removal. Petitions will be reviewed and a decision will be provided in writing, generally within 30 days of submission. A student may submit multiple petitions, however, the time period between such petitions will be considered in evaluating the merits of the petition.

Appendix 5: Fire Safety Definitions

Arson – Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling, house, public building, motor vehicle or aircraft, personal property of another, etc. Maybe classified as structural, mobile, or other.

Cause of Fire – The factor or factors that give rise to a fire. The casual factor may be but is not limited to, the result of an unintentional action, mechanical failure, or an act of nature.

Evacuation Drill –A supervised practice of a mandatory evacuation of a building in the event of an emergency such as a fire.

Fire – Any open flame or burning in a place not intended to contain the burning or in an uncontrolled manner.

Fire Related Injury – Any instance in which any person is injured because of a fire, including an injury sustained from a natural or accidental cause while involved in fire control, attempting rescue, or escaping from dangers.

Fire Related Death - Any instance in which any person is killed because of a fire, including death sustained from a natural or accidental cause while involved in fire control, attempting rescue, or escaping from dangers, or who passes away within one year of their injuries sustained in such fire.

Fire Safety System – Any mechanism or system related to the detection of fire, the warning resulting from fire, or control of a fire including:

- Sprinkler Systems and all associated devices (water flows, tampers, etc.)
- Standpipe Systems (Hose Racks, Gravity Tanks, Siamese Connections)
- Speakers and Strobes (Visual and Audio)
- Supervised or Stand-Alone Smoke Detectors
- Fire Doors and Fire Rated walls
- Fire Dampers
- Smoke Control and Reduction Mechanisms
- Fire Pumps

Property Value – The estimated value of the items and contents within a structure lost because of a fire, in terms of the replacement cost in kind and quantity including contents damaged, related damages from water and/or smoke and overhaul.

Appendix 6: New York Law School Fire Statistics

Three-Year History

2025

Not applicable, NYLS no longer maintains student residence.

2024

Not applicable, NYLS no longer maintains a student residence.

2023

Not applicable, NYLS no longer maintains a student residence.

Campus Fire Log

The Law School's Campus Fire Log lists all fires reported on campus. This public Log is maintained by the Vice President of Security and Community Affairs and is available for inspection weekdays during regular business hours in the Office of Security and Life Safety. In compliance with the Clery Act, a fire is any instance of open flame or other burning in a place not intended to contain the burning or in a controlled manner.

An electronic compilation of campus crime and fire statistics can also be found at:

https://lawnyls.sharepoint.com/sites/NYLSResourcesPortal/SitePages/CampusSafety/campus-safety.aspx