

PROHIBITION AGAINST SEXUAL HARASSMENT UNDER TITLE IX

OVERVIEW

All forms of sexual harassment are contrary to basic standards of conduct between individuals. State and federal law and this policy prohibit sexual harassment and UCC will not tolerate sexual harassment. Any employee, student, applicant for employment, or applicant for admission who believes that they have been harassed or retaliated against in violation of UCC policy (Board Policy #3433) are encouraged to immediately report such incidents by following the procedures described in Administrative Procedure #3434 (Reporting Form).

UCC requires supervisors and other persons with mandatory reporting obligations (“Officials With Authority” or OWA’s) to promptly notify the Title IX Coordinator of all incidents of harassment and retaliation that come to their attention. UCC seeks to foster an environment in which all employees, students, applicants for employment, and applicants for admission feel free to report incidents of sexual harassment in violation of UCC Board Policy #3433 and Title IX, without fear of retaliation or reprisal. UCC strictly prohibits retaliation against any individual for filing a complaint of sexual harassment prohibited by UCC policy and Title IX law, or for participating, or refusing to participate, in a sexual harassment investigation. UCC will investigate all allegations of Title IX retaliation swiftly and thoroughly. If UCC determines that someone covered by this policy has retaliated, the Administration will take all reasonable steps within its power to stop such conduct. Individuals who engage in Title IX retaliatory conduct are subject to disciplinary action, up to and including termination or expulsion.

UCC shall ensure that the institution undertakes education and training activities to counter sexual harassment and to prevent, minimize, or eliminate any hostile environment that impairs access to equal education opportunity or impacts the terms and conditions of employment.

Umpqua Community College has sexual harassment policy and procedures on the Human Resources website regarding how to file a complaint: <http://www.umpqua.edu/title-ix>. In addition, the HR website outlines procedures regarding sexual harassment, sexual assault, sexual violence, dating violence, domestic violence and stalking. In Fall 2020, these procedures were codified into Board Policy #3433 and Administrative Procedures #3433 and #3434 to reflect the Department of Education’s “Final Rules” effective August 14, 2020.

UCC DEFINITIONS

UCC is committed to providing an academic and work environment free of unlawful sex harassment under Title IX. This procedure defines sexual harassment that is prohibited under Board Policy 3433 and Title IX. The Title IX policy and procedures apply to all students and employees (including interns) who participate in an educational program or activity of UCC in the United States. “Educational program or activity” applies to all incidents that occur on campus, as well as incidents that occur:

1. In any locations, events or circumstances over which the College exercises substantial control over both the accused person and the context in which the alleged sexual harassment occurs, or
2. In any building owned or controlled by a student organization that is officially recognized by UCC.

Definition of Sexual Harassment: Sexual harassment under Title IX means conduct on the basis of sex that one or more of the following:

1. A UCC employee conditioning the availability of educational aid, benefit or service on another person's participation in unwelcome sexual conduct (also called "*quid pro quo* harassment");
2. *Unwelcome conduct* that a reasonable person would determine to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to a UCC education program or activity;
3. *Sexual assault*, which is defined as an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation, and includes:
 - A. Rape
 - B. Sodomy
 - C. Sexual Assault with an Object
 - D. Fondling
 - E. Incest
 - F. Statutory Rape
4. *Dating violence*, which means violence against a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of a relationship will be determined based on a consideration of the following factors: the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.
5. *Domestic Violence*, which means violence committed by:
 - A. A current or former spouse or intimate partner of the victim;
 - B. A person with whom the victim shares a child in common;
 - C. A person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;
 - D. A person similarly situated to a spouse of the victim under the domestic or family violence laws of Oregon; or
 - E. Any other person against an adult or youth victim protected from that person's acts under the domestic or family violence laws of Oregon.
6. *Stalking*, which means engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for his/her/their safety or the safety of others or suffer substantial emotional distress.

Consent

Consent is a knowing, voluntary, and clear mutual agreement to engage in sexual activity. Consent must be freely and actively given, and communicated by clearly and mutually understandable words or actions to participate in each form of sexual activity. Consent may be withdrawn at any time. Consent to some sexual contact cannot be presumed to be consent for other sexual activity including previous consent or the existence of a current or previous relationship. Silence or the absence of resistance is not the same as consent.

Lack of Consent means the person has not given consent because:

- The person is incapable of giving consent because of mental, developmental, or physical disability.

- Force is used or threatened
- The person is incapable of giving consent as a result judgment-inhibiting intoxication without regard to the intoxicant.
- The person is not sufficiently conscious to provide consent.
- The person is not old enough to give consent. In Oregon, any person who has reason to believe that a child is a victim/survivor of child abuse or neglect has a duty to make a report to Department of Human Services or to the police. This is also known as Mandatory Reporting.

Explanation of Differences in Policy Definitions and Annual Reporting Statistics

UCC is required to report statistical information about reports of sexual harassment, sexual assault, dating violence, domestic violence, and stalking as defined in the Violence against Women Act Amendments of 2013 and its implementing regulations. A full review of the definitions used for UCC's reporting of the annual crime statistics for sexual assault, dating violence, domestic violence and stalking are in Section 6 of this report.

UCC'S PROCEDURE FOR INVESTIGATION AND RESOLUTION OF SEXUAL HARASSMENT

The Title IX Coordinator will have a prompt, adequate, reliable and impartial investigation of complaints, except in cases where a complainant has requested that the investigation not proceed and the Title IX Coordinator has agreed. During the investigation phase, both the complainant and respondent will have the opportunity to give a statement, present witnesses and provide evidence.

The Title IX Coordinator and, in the case of complaints involving student respondents, the Title IX Coordinator will use the following guiding principles to investigate and resolve each report of a violation as follows:

- The investigation and resolution of reports will be conducted in a manner that will protect the rights of all involved, including providing primary participants with timely and equal information and the opportunity to be heard during the investigation.
- The investigation and resolution of reports will be conducted objectively and impartially. In the event of a conflict of interest, those involved in the investigation or resolution of the complaint will not serve in a decision-making or investigative capacity.
- The investigation and resolution of reports will be conducted promptly.
- The investigation and resolution of reports will be conducted with discretion. The dissemination of information will only be done on a need-to-know basis, thus maintaining privacy for the primary participants.
- The investigation and resolution of reports will be conducted by individuals who have been trained in the investigation and resolution of sexual misconduct, intimate-partner violence, and stalking.
- The Title IX Coordinator will oversee a prompt, adequate, reliable and impartial investigation of complaints, except in cases where a complainant has requested that the investigation not proceed and the Title IX Coordinator has agreed. During the investigation phase, both the complainant and respondent will have the opportunity to give a statement, present witnesses and provide evidence.

The Title IX Coordinator will use the following guiding principles to investigate and resolve each report of a violation as follows:

- The investigation and resolution of reports will be conducted in a manner that will protect the rights of all involved, including providing primary participants with timely and equal information and the opportunity to be heard during the investigation.
- The investigation and resolution of reports will be conducted objectively and impartially.
- The investigation and resolution of reports will be conducted promptly.
- The investigation and resolution of reports will be conducted with discretion. The dissemination of information will only be done on a need-to-know basis, thus maintaining privacy for the primary participants.
- The investigation and resolution of reports will be conducted by individuals who have been trained in the investigation and resolution of sexual harassment allegations.

Reporting Sexual Harassment

Any individual may report sexual harassment to the Title IX Coordinator, and the Title IX Coordinator is required to respond to reports of sexual harassment. The Title IX Coordinator will handle the information reported under this administrative procedure with discretion and will share the information with others only on a need-to-know basis. For example, the Title IX Coordinator may need to address public safety concerns on campus, comply with State and federal legal requirements, or share information to implement supportive measures.

Some employees of the College have mandatory obligations to report knowledge of allegations of sexual harassment to the Title IX Coordinator (see “Officials with Authority” below). In contrast, other employees of the College have confidentiality restrictions on reporting allegations of sexual harassment (see “Confidential Resources” below). Employees who are neither Officials with Authority nor Confidential Resources are encouraged to report allegations of sexual harassment toward another individual covered by this procedure but are not required to do so.

Mandatory Reporting by Officials with Authority

1. Certain employees of the College who are designated as “Officials with Authority” are required to immediately report allegations of sexual harassment to the Title IX Coordinator. Officials with Authority are required to report all relevant information known about sexual harassment, including the name of the Respondent, the Complainant, any other witnesses, and the date, time, and location of the alleged incident.

2. UCC has designated the following employees as Officials with Authority:

- A. Provost
- B. Assistant Vice President for Enrollment and Student Services
- C. Assistant Vice President for Academic Services
- D. Dean of Community Education and Partnerships
- E. Director of Human Resources
- F. Compliance Officer

- G. Chief of Security
- H. Athletic Director
- I. Assistant Athletic Director

UCC Confidential Resources

1. "Confidential Resources" are persons who are not obligated to share any personally identifying information about a report of sexual harassment (such as the survivor or accused's name) with law enforcement, the Title IX Coordinator, or any other UCC administrator.

2. The following individuals who are employed by or affiliated with UCC are designated as Confidential Resources:

Hanna Culbertson, Wellness Counselor
541-440-7896
Hanna.Culbertson@umpqua.edu

Erin Ritchie, C.A.R.E. Advocate
UCC Campus Outreach
541-440-7866
erin@peaceathome.com

Investigation and Determination of Policy Violation

1. Title IX Coordinator's Initial Assessment of Health and Safety Risks

A. A report of sexual harassment to the Title IX Coordinator does not result in a full investigation unless a Formal Complaint is filed under the process discussed below. However, upon receiving a report of sexual harassment, the Title IX Coordinator will make an initial assessment regarding the health and safety of the Complainant, and will also determine whether there is a safety risk to the campus community as a whole.

B. If the Title IX Coordinator finds there is a continued risk to the campus community, the Title IX Coordinator may file a Formal Complaint without the Complainant's consent or cooperation.

C. Additionally, based on the initial assessment or at any time thereafter, the College may order "emergency removal" of a non-employee Respondent, or place an employee Respondent on "administrative leave" as discussed more fully below.

2. Emergency Removal of a Non-Employee Respondent

A. UCC may remove a non-employee Respondent from an education program or activity on an emergency basis after the Title IX Coordinator (or other designated official) conducts an individualized safety and risk analysis arising from the allegations of sexual harassment. There must be an immediate threat to the physical health or safety of any student or other individual on campus to justify removal. The College may not use an emergency removal to address generalized concerns of the Respondent obstructing a sexual harassment investigation or destroying relevant evidence.

B. If it is determined that emergency removal is appropriate, the Respondent will be provided with a notice and opportunity to attend a meeting with the Title IX Coordinator (or other person making the determination) for the purpose of challenging the removal. The person making the determination must consider the information provided by the Respondent before making a final decision upholding the emergency removal.

3. Administrative Leave

The College may place an employee Respondent on administrative leave during the pendency of a Formal Complaint process described below. UCC will follow any relevant policies, procedures, collective bargaining agreements, or applicable laws in placing an employee on administrative leave. Although this section is not intended to apply to student employees who are Respondents, Title IX does not prohibit a student employee from being placed on administrative leave if the College determines that it is appropriate based on the circumstances of the particular case.

4. Title IX Coordinator's Initial Response Regarding Supportive Measures

A. Upon receiving a report of Sexual Harassment, the Title IX Coordinator will also promptly contact the Complainant to discuss supportive measures that may be offered. In doing so, the Title IX Coordinator shall:

- i. Consider the Complainant's wishes with respect to supportive measures;
- ii. Inform the Complainant of supportive measures that can be taken with or without the filing of a Formal Complaint; and
- iii. Explain the process for filing a Formal Complaint.

B. "Supportive measures" means individualized services reasonably available to a Complainant or Respondent, free of charge, that are non-punitive, non-disciplinary, and not unreasonably burdensome to the other Party. Supportive measures must be designed to ensure equal educational access, and may also be designed to protect safety and deter sexual harassment. Supportive measures may include:

- i. Counseling
- ii. Course-related adjustments such as extending deadlines
- iii. Modifications of work or class schedules
- iv. Campus escort services
- v. Changes in work or housing locations
- vi. Increased security and monitoring of certain areas of campus
- vii. Mutual restrictions on contact between the Parties
- viii. Leaves of absence

C. Supportive measures may be offered to the Complainant or the Respondent at any time before or after a Formal Complaint is filed.

5. Criminal Investigations by Law Enforcement

If there are parallel criminal and Title IX investigations, UCC will cooperate with the external law enforcement agency and will coordinate to ensure that the Title IX process does not hinder legal process or proceedings.

6. Clery Act Reporting of Sexual Harassment Allegations

UCC will document reports of sexual harassment in compliance with the Clery Act, a federal law requiring data collection of crime within the campus geography. Under the Clery Act, the College does not document personal information, and only reports the type of conduct, and the time, date, and location of the conduct. (Also see BP/AP 3540 Sexual and Other Assaults on Campus).

7. Formal Complaint Process - Notice to Parties

A. Upon receipt of a Formal Complaint, the Title IX Coordinator will provide written notice to the Parties of the following:

- i. An explanation of the Title IX grievance process;
- ii. A statement of the allegations of sexual harassment with sufficient details known at the time, and with sufficient time for the Respondent to prepare a response before any initial interview;
- iii. A statement that the Respondent is presumed to not be responsible for the alleged sexual harassment unless and until a determination of responsibility is made at the conclusion of the Title IX grievance process;
- iv. A statement that each of the Parties may have an Advisor of his or her choice, who may be, but is not required to be, an attorney;
- v. A statement that the Parties may inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in the Formal Complaint.
- vi. A statement informing the Parties of any provision in the College's code of conduct or employment policies that prohibits knowingly making false statements or knowingly submitting false information during the grievance process (including the investigation stage).

B. If, in the course of an investigation, a determination is made to investigate allegations about the Complainant or Respondent that are not included in the notice provided above, the Title IX Coordinator will provide a supplemental written notice to the Parties regarding the additional allegations.

8. Dismissal of Formal Complaint

A. UCC must dismiss a Formal Complaint for lack of jurisdiction under Title IX if it determines at any stage of the process that any of the following circumstances exist:

- i. The conduct alleged in the formal complaint would not constitute Title IX sexual harassment as defined in this procedure;
- ii. The conduct alleged did not occur in a UCC "education program or activity," as defined under "Jurisdictional Requirements" discussed above;
- iii. OR The conduct alleged did not occur against a person in the United States.

B. UCC has discretion to dismiss a Formal Complaint or any allegation under the following circumstances:

- i. At any time during the investigation or hearing, the Complainant notifies the Title IX Coordinator in writing that the Complainant would like to withdraw the Formal Complaint or any allegation;
- ii. The Respondent is no longer enrolled or employed by the UCC; or

iii. There are specific circumstances that prevent UCC from gathering evidence sufficient to reach a determination regarding responsibility as to the Formal Complaint or allegation.

C. If UCC dismisses the formal complaint or any allegations, the Title IX Coordinator shall provide the Parties simultaneously with written notice of the dismissal and the reason for the dismissal. The Parties must also be notified of the right to appeal the determination (see procedures and grounds for appeals below). After dismissing a Formal Complaint under this procedure, UCC may commence or continue an investigation or other grievance or disciplinary process under any other applicable UCC policy or procedure.

9. Consolidation of Formal Complaints

UCC has discretion to consolidate Formal Complaints if the allegations of sexual harassment arise out of the same facts or circumstances. For example, this would include complaints filed by a single Complainant against more than one Respondent, or complaints filed by multiple Complainants against the same Respondent(s).

10. Equitable Treatment of the Parties and Presumption of Non-Responsibility

A determination of responsibility for sexual harassment under this procedure is a neutral, fact-finding process. UCC will treat Complainants and Respondents equitably, and the Formal Complaint and grievance process procedures will apply equally to both Parties.

This means that there is a presumption that all reports of sexual harassment are made in good faith, and a presumption that the Respondent is not responsible for the alleged sexual harassment unless there is a determination of responsibility at the conclusion of the grievance process. UCC will not discipline a Respondent prior to a final determination of responsibility, including completion of an appeal of the determination under this administrative procedure.

11. Bias or Conflict of Interest

A. UCC shall insure that none of the Title IX personnel participating in the Title IX process under this administrative procedure has any basis for bias, or a conflict of interest, for or against the Complainant or Respondent. This includes: a. The Title IX Coordinator, b. An investigator, c. A Decision-Maker, or d. Any person designated to facilitate an informal resolution process.

B. "Bias," as used in this section means a specific, articulable basis for a participant being prejudiced in favor of or against any Party, or a Party's position. "Bias" does not mean a generalized concern about a participant's the personal or professional background or beliefs.

12. Role of the Advisor

A. The Parties are entitled to have the assistance of an Advisor of their choosing throughout the Title IX grievance process, including during an investigation interview, reviewing an investigation report, or inspecting evidence gathered in the investigation.

B. The role of the Advisor during an investigation is to provide support and assistance in understanding and navigating the investigation process. The Advisor may not testify in or obstruct an interview or disrupt the process. The Title IX Coordinator has the right to determine what constitutes appropriate behavior of an Advisor and take reasonable steps to ensure compliance with this procedure.

C. At the hearing, a Party does not have a right to self-representation, and an Advisor must conduct any cross-examination of the other Party or witnesses. UCC is required to select and provide an Advisor, free of charge, to any Party who does not have an Advisor, including if the Advisor chosen by a Party fails to appear at the hearing. Each Party is limited to one Advisor at the hearing, in order to limit the number of individuals who will have access to confidential information about the issues.

13. Applicable Training

A. UCC will ensure that Title IX personnel receive training applicable to their roles in the Formal Complaint Process including, at a minimum, training regarding:

- i. The definition of sexual harassment under Title IX;
- ii. The scope of the College's "education program or activity," such as the extent to which it includes incidents that occur off-campus;
- iii. How to investigate sexual harassment allegations fairly and objectively, and for investigators, how to prepare an investigative report that fairly summarizes the relevant evidence and complies with this administrative procedure;
- iv. How to conduct a grievance process (including investigations, hearings, appeals, and informal resolution processes, as applicable);
- v. How to use technology at live hearings, for decision-makers;
- vi. Issues of relevance, for investigators and Decision-Makers.
- vii. Decision-Makers should be trained regarding the application of "rape shield" protections for Complainants; for example, questions and evidence about a complainant's prior sexual behavior are irrelevant unless offered to prove that someone other than the respondent committed the alleged misconduct, or offered to prove consent.

B. Any materials used to train the Title IX personnel will not rely on sex stereotypes and must promote impartial investigations and adjudications of formal complaints of sexual harassment. UCC will make the training materials publicly available on its website.

14. Investigation

A. Commencing an Investigation and Selecting an Investigator

i. The filing of a Formal Complaint will result in initiating an investigation. The Title IX Coordinator is responsible to oversee investigations to ensure timely resolution and compliance with Title IX and this procedure. Any individual serving as an investigator under this administrative procedure must have adequate training, as set forth under "Applicable Training" above.

B. Obtaining Evidence During the Investigation

i. UCC, not the Parties, has the responsibility to gather information regarding the allegations of sexual harassment, including the interviewing of witnesses. However, as stated above, UCC will not restrict the ability of any Party to discuss the allegations under investigation, or to gather and present relevant evidence.

C. Notice of Investigative Interview

i. UCC will provide written notice of the date, time, location, participants, and purpose of all investigative interviews to any Party whose participation is invited or expected, with sufficient time for the Party to prepare to participate.

D. Evidence Review

i. All Parties will have an equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in the Formal Complaint. This includes evidence upon which UCC does not intend to rely in reaching a determination regarding responsibility, as well as all inculpatory or exculpatory evidence whether obtained from a Party or other source.

ii. Prior to the investigator preparing an investigative report, UCC will send to each Party and the Party's Advisor, in electronic format or hard copy, the evidence subject to inspection and review. The Parties will have at least ten business days to submit a written response. The investigator must consider this written response prior to completing the investigative report.

E. Investigative Report

i. The results of the investigation will be set forth in a written report by the investigator that fairly summarizes the relevant evidence, and should include the following information:

1. A description of the circumstances giving rise to the Formal Complaint;
2. A description of the procedural steps taken during the investigation, including all individuals contacted and interviewed;
3. A summary of the testimony of each witness the investigator interviewed;
4. An analysis of other relevant evidence collected during the investigation, including a list of relevant documents; and
5. A table of contents if the report exceeds ten pages.

ii. The investigator will not make a determination regarding responsibility because the Decision-Maker must make an independent determination. However, the investigator may, but is not required to, make a recommendation regarding a determination of responsibility. If the investigator makes a recommendation, it should be based on the same burden of proof that will be applied by the DecisionMaker.

iii. UCC may permit the investigator to redact confidential information from the report that is not directly related to the allegations, and the investigator must redact privileged information unless the privilege has been waived by the Party holding the privilege. The investigator will keep a log of information that is not produced to the Parties, and will only provide this log to the Title IX Coordinator. The Title IX Coordinator will not disclose the log to the Parties but will maintain the log in the Title IX Coordinator's file, in the event it later becomes relevant.

iv. At least ten (10) business days prior to a hearing or other time of determination regarding responsibility, the investigative report will be provided to each Party and their Advisors, if any. The investigative report may be provided in an electronic format or a hard copy, for review and written response. The Parties will have at least ten (10) business days to submit a written response.

15. Requirement of live hearing

A. After completing an investigation and prior to a determination of responsibility or nonresponsibility, the College will hold a live hearing. The purpose of the hearing is to provide the Complainant and Respondent an opportunity to respond to the evidence set forth in the investigation report that will be considered by the Decision-Maker. UCC will provide all Parties written notice of the date, time, location, participants, and purpose of the hearing, with sufficient time for the Parties to prepare to participate.

B. Neither Party may choose to waive the other Party's right to a live hearing, but the Parties can choose whether to participate in the hearing, and can decline to answer some or all cross-examination questions.

C. During the hearing, both the Complainant and Respondent have a right to an Advisor of their choice. If a Party does not have an Advisor at the time of the hearing, the College must select and provide an Advisor for that Party free of charge. Advisors should be present for the entire hearing in order to hear all of the evidence that is presented.

16. Hearing format

A. UCC shall provide a live hearing with all Parties physically present in the same geographic location or, at UCC's discretion, it may allow any or all Parties, witnesses and other participants to appear at the live hearing virtually, provided the technology enables the participants to see and hear each other in real time. Additionally, at the request of either party, UCC shall provide for the hearing to occur with the Parties located in separate rooms, with technology enabling the Decision-Maker and Parties to simultaneously see and hear each other and the witnesses who are answering questions. UCC will create an audio or audiovisual recording, or transcript, of any live hearing and make it available to the Parties for inspection and review.

B. The information provided to the Parties during the "Evidence Review" (discussed above) shall be available at the hearing for reference and consultation. Only relevant evidence will be admissible during the hearing. "Relevant evidence" means evidence having any reasonable tendency to prove or disprove any disputed fact that is material to the allegations against the Respondent, including the credibility of a Party or a witness.

17. Decision-Maker

A. The Decision-Maker must be a different person than the other Title IX personnel involved in the case (i.e. the Title IX Coordinator, the investigator, and any person who facilitated an informal resolution process). As stated above, the Decision-Maker must not have any conflict of interest or have a bias for or against the Complainant(s) or Respondent(s).

B. If the Complainant or Respondent objects to the Decision-Maker based on concerns of bias or a conflict of interest, that Party must make the objection in writing at least 5 business days prior to the hearing, unless the Title IX Coordinator determines that the circumstances warrant a shorter time period. The written objection must state the specific basis for the concern of bias or conflict of interest. The Title IX Coordinator shall consider the basis of the objection and may select a different Decision-Maker.

C. The Title IX rules provide that the Decision-Maker:

i. Must receive training on the issues listed above under "Applicable Training";

- ii. May ask the Parties and the witnesses questions during the hearing; and
- iii. Must objectively evaluate all relevant evidence, both inculpatory and exculpatory, and must independently reach a determination regarding responsibility without giving deference to the investigative report.

18. Presenting Witnesses

A. The Complainant and Respondent must be provided an equal opportunity to present witnesses, including fact and expert witnesses, and other inculpatory and exculpatory evidence. Witnesses, like Parties, are not required to participate in the hearing.

19. Cross-Examination

A. The Decision-Maker will permit each Party's Advisor to ask the other Party and any witnesses all relevant questions and follow-up questions, including those questions challenging credibility. The Party's Advisor must conduct cross examination directly, orally, and in real time. A Party may never personally conduct cross-examination.

B. Before a Complainant, Respondent, or witness answers a cross-examination question or other question, the Decision-Maker must first determine whether the question is relevant and explain any decision to exclude a question as not relevant. The Decision-Maker need not provide a lengthy or complicated explanation in support of a relevance determination.

If a Party or witness disagrees with a relevance determination, that individual has the choice of either abiding by the Decision-Maker's determination and answering the question, or refusing to answer the question.

C. If a Party or witness does not submit to cross-examination at the live hearing, the Decision-Maker will not rely on any statement of that Party or witness in reaching a determination regarding responsibility. If a Party or witness submits to cross examination but declines to answer a specific question, the Decision-Maker cannot rely on any statement regarding the issue on which the Party or witness declined to be crossexamined. A Decision-Maker also cannot draw an inference regarding the determination of responsibility based solely on a Party's or witness's absence from the live hearing, or refusal to answer cross-examination or other questions.

20. Determination of Responsibility

A. The Decision-Maker will issue a written determination regarding responsibility or nonresponsibility no later than twenty (20) business days after the date that the hearing ends.

B. When making a determination regarding responsibility, a Decision-Maker will objectively evaluate all relevant evidence, including both inculpatory and exculpatory evidence. A Decision-Maker may not make credibility determinations based on an individual's status as a Complainant, Respondent, or witness. In evaluating the evidence, the Decision-Maker will use a "clear and convincing" evidence standard. This means that after considering all the evidence presented, the Decision-Maker will decide whether it is substantially more likely than not that the Respondent engaged in sexual harassment under Title IX.

C. The Decision-Maker's written determination must include:

- i. Identification of the allegations that allegedly constitute Title IX sexual harassment, as defined in AP 3433 and consistent with the Decision-Maker's training.
- ii. A description of the procedural steps taken from the receipt of the Formal Complaint through the determination, including who conducted the investigation and gave notifications to the Parties. The determination will also state when, where, and the date the investigator interviewed the Parties and witnesses, conducted site visits, and the methods used to gather other evidence. The procedural section should also discuss the dates and how the Parties were provided the opportunity to review and inspect evidence and the date of any hearings held and who attended the hearing.
- iii. Findings of fact supporting the determination. In making these findings, the Decision-Maker will focus on analyzing the findings of fact that support the determination of responsibility or non-responsibility.
- iv. Conclusions regarding the application of UCC's code of conduct to the facts.
- v. A determination regarding responsibility or non-responsibility for each allegation, and the Decision-Maker's rationale for the result;
- vi. Any disciplinary sanctions to be imposed to be imposed on the Respondent.
- vii. Whether UCC will provide the Complainant with remedies, which should be designed to restore or preserve equal access to the UCC's education program or activity. To protect the Complainant's privacy rights, the determination need not disclose the nature of the remedies, and the Complainant can then communicate separately with the Title IX Coordinator to discuss what remedies are appropriate.
- viii. UCC's procedures and permissible bases for the Complainant or Respondent to appeal.

D. The written determination shall be provided to the Parties simultaneously. The determination regarding responsibility becomes final either on the date that the time for filing an appeal expires, or on the date that the Parties are provided with the written determination regarding the appeal if a timely appeal was filed.

21. Disciplinary Sanctions and Remedies

A. The grievance procedures (including investigation, hearing, and any appeal, if applicable) must be completed before any disciplinary sanctions, or any other actions that are not supportive measures, are imposed against a Respondent. If the Decision-Maker determines that the Respondent was responsible for conduct that constitutes sexual harassment under Title IX, UCC will take disciplinary action against the Respondent and any other remedial action it determines to be appropriate under this administrative procedure. The action will be prompt, effective, and commensurate with the severity of the offense.

B. Possible disciplinary sanctions for a student Respondent include written or verbal reprimand, required training or counseling, non-academic probation, suspension, or expulsion. Possible disciplinary sanctions for an employee Respondent include written or verbal reprimand, required training or counseling, demotion, suspension, or discharge.

C. Remedies for the Complainant may include, but are not limited to:

- i. Providing an escort to ensure that the Complainant can move safely between classes and activities;
- ii. Ensuring that the Complainant and Respondent do not attend the same classes or work in the same work area;
- iii. Providing counseling services or a referral to counseling services;

- iv. Providing medical services or a referral to medical services;
- v. Providing academic support services, such as tutoring;
- vi. Reviewing any disciplinary actions that have been taken against the Complainant to determine whether the sexual harassment may have caused or contributed to the misconduct that resulted in the Complainant's discipline.

22. Procedure and Grounds for Appealing a Determination of Responsibility or Dismissal of a Formal Complaint

A. A Complainant or Respondent may appeal either a determination regarding responsibility or non-responsibility, or the dismissal of a Formal Complaint or allegations (see "Dismissal of Formal Complaint" above). A Complainant or Respondent must submit a written appeal to the Title IX Coordinator within ten (10) business days from the date of the notice of determination or dismissal.

B. In the written appeal, the Party must state the grounds for appeal, and a statement of facts supporting those grounds. The permissible grounds for appeal under this administrative procedure are as follows:

- i. A procedural irregularity that affected the outcome;
- ii. Newly discovered evidence that was not reasonably available when the decision was made, and that could affect the outcome; or
- iii. The Title IX Coordinator, investigator, or Decision-Maker had a conflict of interest or bias for or against the Complainant(s) or Respondent(s) that affected the outcome.

C. A person who was not previously involved in the grievance process as Title IX personnel will be selected to serve as the Decision-Maker on Appeal. Within five (5) business days after receiving the written appeal, the Decision-Maker on Appeal (or the Title IX Coordinator if no Decision-Maker on Appeal has been appointed) will provide written notice to the Parties of the following:

- i. That an appeal has been made, and providing a copy of the written appeal; and
- ii. That the non-appealing Party or Parties may submit a written response to the appeal within ten (10) business days.

D. Either Party may seek an extension of the deadlines stated above for submitting or responding to an appeal by submitting a written request to the Title IX Coordinator. The request must be submitted as soon as possible before the deadline, and must explain the need for the extension and the proposed length of the extension. The Decision-Maker on Appeal (or the Title IX Coordinator if no Decision-Maker has been appointed) will respond to the request in writing within three (3) business days and will inform the Parties simultaneously whether an extension is granted.

E. The Decision-Maker on Appeal will issue a written decision on whether to grant or deny the appeal, and the rationale for the decision, within twenty (20) business days after the Decision-Maker on appeal receives the response to the appeal, or the last day to provide a response, whichever occurs first. The written decision will be provided simultaneously to all Parties.

23. Informal Resolution

A. An informal resolution process may not be offered before a Formal Complaint is filed. If UCC determines that a Formal Complaint is appropriate for informal resolution, it may provide the Parties with the opportunity to participate in an informal resolution process, including mediation, at any time before a determination regarding responsibility has been made. The Title IX Coordinator will provide the Complainant and Respondent with written notice of the allegations (if this notice has not already been provided) and an explanation of the informal resolution process, including:

i. The circumstances, such as reaching an agreement for resolution, that may preclude the Parties from resuming a Formal Complaint arising from the same allegations, and

B. A Party cannot be required to participate in the informal resolution process, and UCC must obtain both Parties' voluntary and informed written consent to the informal resolution process. At any time prior to agreeing to a resolution, a Party has the right to withdraw from the informal resolution process and resume the grievance process with respect to the Formal Complaint. If the Parties reach an agreement, UCC is not required to complete a full investigation or the grievance process under a Formal Complaint.

C. The informal resolution process is not available to resolve allegations that an employee sexually harassed a student.

24. Confidentiality and Non-Disclosure Agreements Regarding Evidence

A. UCC must keep confidential the identity of complainants, respondents, and witnesses, except as may be permitted by FERPA, as required by law, or as necessary to carry out a Title IX proceeding. Additionally, to protect the privacy of those involved, the Parties and Advisors may be required to sign a non-disclosure agreement, consistent with applicable law, prior to attending an investigation interview or otherwise participating in the College's grievance process.

B. A "non-disclosure agreement" restricts the Parties and their Advisors from disseminating evidence obtained in the Title IX process by providing that it can only be reviewed or used for purposes of the Title IX grievance process. However, the non-disclosure agreement will not restrict the ability of either Party to discuss the allegations under investigation.

Title IX requirements are not intended to restrict the rights of Complainants or Respondents that are protected under the U.S. Constitution, including the First Amendment.

25. Safeguards for Privileged Information

UCC's Formal Complaint procedure does not require, allow, rely upon, or otherwise use questions or evidence that constitute, or seek disclosure of, information protected under a legally-recognized privilege (e.g., attorney-client privilege, doctor-patient privilege, spousal privilege, etc.), unless the person holding the privilege provides voluntary, written consent to waive the privilege.

26. Prohibition of Retaliation

A. UCC prohibits any intimidation, threats, coercion, or discrimination against any individual who has made a report or complaint of sexual harassment, testified, assisted, or participated or refused to participate in any manner in a Title IX investigation, proceeding, or hearing.

B. Prohibited retaliation does not include:

- i. The exercise of rights protected under the First Amendment (e.g. freedom of speech).
 - ii. Charging an individual with a code of conduct violation for making a materially false statement in bad faith during the course of a Title IX grievance proceeding does not constitute retaliation; however, a determination that a party made a bad faith false statement cannot be based solely on a determination of responsibility or non-responsibility.
- C. Individuals who experience retaliation based on reporting Title IX sexual harassment, or participating in any of the Title IX procedures discussed above, may file a complaint using the Formal Complaint process in this administrative procedure. Complaints alleging retaliation may also be filed under UCC's other applicable grievance and complaint procedures.

27. Time Frame for Investigation and Resolution

UCC will undertake its grievance process promptly and complete it as swiftly as possible while still complying with all of the requirements of this administrative procedure. The Title IX personnel should complete the investigation and a determination regarding responsibility (and the informal resolution process, if applicable) within 180 calendar days from the time that the alleged sexual harassment is reported to the Title IX Coordinator, unless a notice of extension is provided as discussed below.

When appropriate, the Title IX Coordinator (or designated alternate) may determine that good cause exists to extend the 180 period (for example, as needed to conduct a fair and complete investigation, to accommodate an investigation by law enforcement, to accommodate the unavailability of witnesses or delays by the Parties, to account for academic breaks or vacations, or due to the complexity of the investigation). UCC will provide written notice of the extension simultaneously to the Complainant and Respondent, and include the reason for the delay and anticipated timing of completion. A Party may request an extension of the timelines under this Administrative Procedure by submitting the request in writing to the Title IX Coordinator, and explaining the reason for the delay and the length of the continuance requested. The Title IX Coordinator will notify the Parties and document the grant or denial of a request for extension or delay as part of the case recordkeeping.

RESOURCES for COMPLAINANTS OF SEXUAL HARASSMENT

UCC has designed a resource process to assist complainants of sexual harassment. Individuals involved in the response process engage in training to assure students and employees that they are receiving information and assistance in a timely and appropriate manner.

Steps a Victim/Survivor May Take Immediately:

A. Get to a safe place as soon as possible. Your safety is most important.

B. Seek Medical Attention. After an incident of sexual harassment, sexual assault, dating violence, domestic violence, or stalking the victim/survivor should consider seeking medical attention as soon as possible, as appropriate, even if there are no obvious signs of physical injury. You may wish to consult with medical personnel quickly regarding: prevention of sexual transmitted infections, pregnancy; evidence collection, and toxicology testing if there are signs that drugs or alcohol may have facilitated the assault. Individuals of any gender can be victim/survivor of sexual harassment, sexual assault, dating violence, domestic violence and stalking. We encourage a victim/survivor to go to the emergency room at Mercy Medical Center, and for those age 14 and under, Douglas C.A.R.E.S.

Douglas C.A.R.E.S. - Pediatric care for those ages 14 years and under 545 W. Umpqua Street, Suite 1, Roseburg, OR 97471 <http://www.douglascare.org/> 541-957-5646 -- Contact: Emergency Room Manager

Mercy Medical Center has trained Sexual Assault Nurse Examiners (SANE) nurses who conduct forensic examinations and collect the evidence for the sexual assault kits. In Oregon, evidence may be collected even if you chose not to make a report to law enforcement. SANE services are provided free of charge to all victim/survivor, regardless of your decision to involve law enforcement

Mercy Medical Center - Sexual Assault Nurse Examiners (SANE) Program

2700 NW Stewart Parkway,
Roseburg, OR 97471 <http://mercyrose.org/>
541-673-0611

The SANE Program is staffed by registered nurses who have advanced education and instruction in medical-forensic examination and in psychological and emotional trauma. SANE's philosophy of nursing empowers patients to determine their plan of care, including:

- Emotional support
- Physical examination and wellness check
- Collection of medical-forensic evidence
- Assistance with reporting the crime to police, when requested (mandatory reporting for children)
- Assistance with concerns about sexually transmitted infections and pregnancy
- Assistance with safety planning
- Development of a medical follow-up plan

Things to know about the SANE Exam:

- During the exam you can expect to be examined for internal and external injuries, foreign hair samples, and semen/other body fluids.
- If possible bring an extra set of clothes (if you decide to have evidence collected, the police may want the clothes worn during the assault for evidence) and a friend or another supportive person.
- If you think you may want to file a police report in the future, do not shower, drink, eat, douche, or change your clothes prior to the exam. These activities can destroy important physical evidence that is useful should you decide to make a police report.

If you've already showered or changed, it's still okay to go to SANE for an exam. Also, document everything you remember happening with as much detail as possible. (This can also help should you decide to take legal action). If you have changed your clothes, please bring the clothes you were wearing to the hospital. (Note that the SANE may ask to keep both sets of clothing.)

- You can choose to have forensic evidence collected without filing a police report immediately. In the event an adult victim/survivor chooses not to report the sexual assault incident to law enforcement; evidence obtained from the examination will be securely stored for the period of one year using only a confidential number. In circumstances of sexual assault, if victim/survivor do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address concerns of pregnancy and/or sexually transmitted infections. Victim/survivors of sexual assault, domestic violence, stalking, and dating violence are encouraged to also preserve evidence by saving text messages, instant messages, social networking pages, other communications, and keeping pictures, logs or other copies of documents, if they have any, that would be useful to College investigators or police.

Preserve Evidence

Best practices are to preserve evidence include seeking medical attention shortly after the event.

- Do not shower, drink, eat, douche, or change your cloths prior to the exam. Do not bathe, wash your hands, brush your teeth, drink, eat, or even use the restroom – all these things can destroy evidence that may be helpful in a criminal investigation; however if you have done any of these things since the attack, evidence can still be collected.
- Avoid changing your clothes. It is recommended that you bring an extra set of clothes with you to the hospital.
- Do not clean or remove anything from the location where the attack occurred.
- You may consider preserving other relevant information such as communications from the perpetrator in the case of stalking such as social media posts, emails, text or other materials.

As time passes, evidence may dissipate or become lost or unavailable, thereby making investigation, possible prosecution, disciplinary proceedings, or obtaining protection from abuse orders related to the incident more difficult. If a victim/survivor chooses not to make a complaint regarding an incident, he or she nevertheless should consider speaking with UCC Security Department or other law enforcement to preserve evidence in the event that the victim/survivor decides to report the incident to law enforcement or the College at a later date to assist in proving that the alleged criminal offense occurred or that may be helpful in obtaining a protection order. If you wish to press charges or seek a protective

order, it is important to preserve and record evidence including recording a description of the perpetrator (including type of clothing, race, age, height, weight, hair color, eye color, distinguishing marks, etc.), details of events, where events occurred, and the direction of travel of any vehicle involved. Best practices to preserve evidence with respect to sexual offenses include seeking medical attention shortly after the event.

Report the Alleged Offense to Law Enforcement

If the victim/survivor of sexual harassment, sexual assault, dating violence, domestic violence or stalking wishes to have the assistance of law enforcement, the victim/survivor should contact the UCC Security Department immediately by calling 541-440-7777. If the individual is off-campus, immediately call 911 or contact the appropriate law enforcement agency:

Law Enforcement Contact Phone Numbers:

Douglas County Sheriff Main Office Number: 541-440-4450

Oregon Department of State Police Roseburg: 541-440-3334

Roseburg Police for Off-Campus Sites 541-492-6760

Talk with an Advocate or a Wellness Counselor

Talk with an advocate, a wellness counselor or contact someone you trust to be with you and support you. You may ask UCC Security Department to contact the wellness coordinator who is available for confidential consultation in regard to sexual harassment, sexual assault, dating violence, domestic violence, and stalking. Both the wellness coordinator and C.A.R.E Advocate can provide assistance with navigating policies and understanding processes pertaining to academics and the filing of complaints. Please contact:

Hanna Culbertson, Wellness Coordinator

541-440-7900

Hanna.Culbertson@umpqua.edu

Erin Ritchie, C.A.R.E. Advocate

UCC Campus Outreach

541-440-7866

erin@peaceathome.com

Campus and community resources for victims of sexual harassment including sexual assault, dating violence, domestic violence, or stalking

1. On campus resources

- Security Department – 541-440-7777
- Campus Mental Health, Recovery and Wellness – 541-440-7896
- Title IX Coordinator – 541-541-7763
- Deputy Title IX Coordinator – 541-440-7690

- Dean of Student Services – 541-440-7749

2. Off Campus Resources

- Douglas County Sheriff - 541-440-4450
- Oregon Department of State Police - Roseburg: 541-440-3334
- Mercy Medical Center – 541-673-0611
- Reliant Behavioral Health – 866-750-1327 (www.MyRBH.com) (for employees)
- Compass Behavioral Health – 541-440-3532 or 800-866-9780
- Peace at Home Advocacy Center – 541-673-7867 or 800-464-6543
- National Sexual Assault Helpline - 800-656-HOPE
- National Resources Center on Domestic Violence Hotline - 800-799-SAFE
- Veterans Crisis Line – 800-273-8255

Assistance for Complainants: Rights & Options

Regardless of whether a complainant elects to pursue a criminal complaint, report the matter to the Title IX Coordinator or whether the offense is alleged to have occurred on or off campus, the College will assist complainants of sexual harassment and will provide each complainant with a written explanation of their rights and options. Such written information will include:

- Recommended procedures they should follow if a crime of dating violence, domestic violence, sexual assault or stalking has occurred.
- Information about how the institution will protect the confidentiality of participants in any investigation;
- Written notification about supportive measures and resources within the institution and in the community.
- A statement regarding the institution’s provisions about options and assistance for, available assistance in, and how to request supportive measures.
- Explanation of the procedures for institutional disciplinary action against those found responsible for violations of UCC policy.

Umpqua Community College complies with Oregon law in recognizing Protective Order, No Contact Orders, Restraining Orders, or other similar lawful orders. If a campus community member or visitor has a valid court order, please inform the Security Department. Bring a copy of the valid order to the Security Department and one to the Office of the Title IX Coordinator so that we can keep it on file.

If you need to file a Petition for Restraining Order, you may do so at the Douglas County Court House/Clerk’s Office or with the assistance of Peace at Home Advocacy Center. To learn more about protection orders or to get assistance with filing a request for Petition for Restraining Order, please contact any of the following:

- **Douglas County Court House / Clerk’s Office:** 1063 SE Douglas Ave., #221, Roseburg, OR 97470
- **Peace at Home Advocacy Center:** 541-673-7867 / 800-464-6543, 1202 SE Douglas, Roseburg, OR 97470.

Sexual Assault Victims' Rights for External/Legal Proceedings Outside of UCC. In order to protect your rights, you must keep the District Attorney's office, or Juvenile Department updated with your contact information.

General Rights

- Your right to justice includes the right to a meaningful role in the criminal or juvenile justice process, to be treated with dignity and respect, to fair and impartial treatment, and to reasonable protection from the offender.
- Many rights are automatic although you may need to "tell" someone you want to receive them.
- Other rights you must specifically request to receive the right. One way to do this is to contact your District Attorney to request these rights.
- You, your attorney, or, upon your request, the District Attorney, may assert your rights in court.
- You have the right to have a support person with you.
- If your case involved physical harm or death, you may be able to get financial help for counseling, medical or death related costs: Crime Victims' Compensation Program – 800- 503-7983. You can contact Peace at Home for assistance in applying to the CVC Program.
- You can attend open court proceedings.
- You can get a copy of a transcript or recording of open court proceedings if one is already made. You may be charged for the transcript or recording.
- Most "personal identifiers" can usually be protected from an alleged offender. These include your phone number, address, social security number, date of birth, and bank account and credit card account numbers.
- You can get confidential HIV testing, referrals for health care and counseling if the convicted person in your case tests positive for HIV.
- You or the district attorney can ask the court to limit distribution of information and recordings in cases involving sexual or invasion of personal privacy offenses.

Rights that must be requested

- To be notified of certain open court proceedings
- To get criminal history information about the defendant, convicted criminal, alleged youth offender or youth offender.
- That the person charged or convicted in your case get testing for HIV or other communicable diseases if the crime involved the transmission of bodily fluids.

Following an Arrest

Automatic Rights

- The judge will consider your safety at a pre-trial release hearing
- You can refuse to speak to an attorney or private investigator for the defendant or alleged youth offender.
- You will be notified about early disposition programs that may apply to your case.
- The prosecutor will consider any of your recommendations about defendant diversion.

Rights that must be requested

- To be notified in advance about the release hearing.

- To be consulted about the plea negotiations or final plea offer in a violent felony case.

If your case goes to Trial or Sentencing

Automatic Rights

- If a pre-sentence investigation report is ordered in your case, you can include a statement in it.
- The right to express your views at sentencing, in person or in writing.
- Rape shield laws may apply in your case.
- To be notified in advance about the release hearing.
- For the court to exclude media television, photography, or recording equipment during sex offense proceedings. The court may deny this request.

After Sentencing

Automatic Rights

- Prompt restitution for your crime-related costs.
- To be heard at a hearing on a motion to set aside a conviction.

Rights that must be requested

- To be notified of the release of a juvenile offender from an OYA Youth Correctional Facility. You must first provide your contact information to OYA.
- To receive 30 day notice about parole hearings in adult cases. First you must register with the parole board.
- To be notified when the convicted person is released from prison (Request through the VINE link listed below).
- To be notified of hearings where probation may be revoked.
- To receive information about the offender from the Psychiatric Security Review Board (PSRB) if under their jurisdiction. First you must register with the PSRB.

Other Legal Information

- If your case is appealed you may have other rights. For more information contact: Oregon Department of Justice / Crime Victims' Services Division, 800-503-7983
- You have a right to not be contacted by the sex offender convicted in your case. For the information about registered sex offenders' call: Oregon State Police – Sex Offender Information, 503-934-1258
- You can ask for a restraining order if you are a victim/survivor of family, elder, or disabled person abuse or are threatened as such abuse, or if you are a victim/survivor of sexual abuse.
- You can go to court and ask for a stalking protective order if you have been a victim/survivor of stalking.
- If you are a victim/survivor of sexual assault, a hospital must give you accurate information and access to emergency contraception.

- If you are a victim/survivor of domestic violence, you may be able to get financial help from the Department of Human Services through their Oregon Temporary Assistance to Domestic Violence Survivors (TA/DVS) fund.
- If you are a victim/survivor of domestic violence, sexual assault, or stalking, you may be able to:
 - Take leave from work to attend court proceedings
 - Take leave from work for medical or counseling appointments
 - Get unemployment benefits
 - End a rental agreement early
 - Have your locks changed
 - Get special arrangements for public housing
 - Set up a payment plan with the phone company
 - Your immigration status should not affect your rights as a crime victim/survivor.
 - Immigrant victims/survivors may have additional legal options.
 - If your constitutional rights are not honored, you can assert a claim of violation of crime victims/survivors rights. There are time limits for this right. For more information visit: www.doj.state.or.us/victims

Other Resources:

Victim Services Contact

Information Call to Safety

Statewide Referral to Local Crisis Programs

888-235-5333

Catholic Charities Immigration Legal Services

503-542-2855

Crime Victims' Compensation Program

800-503-7983

Oregon Board of Parole & Post-Prison Supervision

503-945-0907

Oregon Crime Victim Law Center

503-208-8160

Oregon Department of Justice

Crime Victims' Services Division

1162 Court Street NE, Salem, OR 97301

503-378-5348 (Salem and surrounding areas) 800-503-7983 (statewide toll free)

www.doj.state.or.us/victims

Oregon Psychiatric Security Review Board
503-229-5596

Oregon Sexual Assault Task Force
503-990-6541
www.oregonsatf.org

Oregon State Bar
800-452-7636
www.osbar.org/public

Oregon State Police - Sex Offender Registry
503-934-1258

Oregon Youth Authority
503-373-7205

Statewide Legal Aid Information
www.oregonlawhelp.org

VINE: Victim Information Notification Everyday
877-674-8463
www.VINELINK.com